

Item 1. Cover Page

**Investore, Inc.
Part 2A of Form ADV Brochure**

195 Montague Street, 14th Floor
Brooklyn, New York 11201
(212)904-0003
www.investore.io
info@investore.io

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This disclosure brochure provides information about the qualifications and business practices of Investore, Inc. If you have any questions about the contents of this disclosure brochure, please contact Diego de la Campa at (212)904-0003 or info@investore.io. The information in this disclosure brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Investore, Inc. is also available on the Internet at www.adviserinfo.sec.gov. You can view our firm's information by searching for Investore, Inc. or our firm's CRD number 305285.

Being registered as an Investment Adviser with the SEC does not imply a certain level of skill or training.

Item 2. Material Changes

We will ensure that you receive a summary of any material changes to this and subsequent disclosure brochures within 120 days after our firm's fiscal year ends. Our firm's fiscal year ends on June 30, so you will receive a summary of any material change to this brochure within one hundred twenty days following the close of the firm's fiscal year. At that time, we will also offer or provide a copy of the most current disclosure brochure. We may also provide other ongoing disclosure information about material changes as necessary.

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Item 4. Advisory Business

Investore, Inc. is an investment adviser registered with the Securities and Exchange Commission and is a Corporation formed under the laws of the State of New York.

- Diego de la Campa is the Chief Executive Officer of Investore, Inc. Plataforma de Fondos SAPI de CV owns one hundred percent of the firm. Full details of the education and business background of Diego de la Campa and a description of Plataforma de Fondos SAPI de CV are provided in *Item 19* of this Disclosure Brochure.
- Investore, Inc. filed its initial application to become registered as an investment adviser in August 2019.

Introduction

The investment advisory services of Investore, Inc. are provided to you through an automated platform to meet your personal needs. You have the opportunity to choose from a series of investment strategies that are chosen by investment experts to fit your investment needs. Experts will only recommend portfolios and investment strategies consisting of ETFs.

Description of Advisory Services

The following are descriptions of the primary advisory services of Investore, Inc.:

- Investore, Inc. applies investment validation methodology so that the investor can be connected with the best investment advisors suited for them.
- Investore, Inc. qualifies investment experts by reviewing their background and personal experience, initiating a telephone interview, confirming data, and requiring that they have some financial expertise certification.
- Investors may access an expert through the platform. The Investore platform will provide details about the annual return and investment objectives.
- Investors may choose a portfolio according to the return and the individuals risk preference. The money will be invested in Exchange Traded Funds accordingly.
- Investore, Inc. does not invest directly in securities or any other financial instrument. Investore, Inc. will only recommend portfolios consisting of ETFs.

Item 5. Fees and Compensation

In addition to the information provided in *Item 4. Advisory Business*, this section provides additional details regarding our firm's services along with descriptions of each service's fees and compensation arrangements.

Subscription Fee

Investore, Inc. will provide asset management services to its investors for a flat subscription fee per portfolio that the investor wishes to follow. The subscription fee will include the price of the recommended expert portfolios. Each user will be charged a fixed rate fee monthly for the Investore, Inc. service. Subscription fees are not negotiable.

Investore's subscription fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which may be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, third party investment and other third parties such as fees charged by managers, custodial fees, deferred sales charges, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Full details of the brokerage arrangement are provided in *Item 12: Brokerage Practices* of this Disclosure Brochure.

Fees will be deducted from the client's assets in their Interactive Brokers, LLC brokerage account at the end of each month.

Investore, Inc will charge AUM-based based fees to all clients. All AUM fees are disclosed and agreed to by each client and managed in accordance with the Advisers Act. These fees are not negotiable. The fees will be paid at the end of each month. Our policies are designed to ensure that client accounts are treated fairly under all circumstances. We strive not to favor any clients or subsets of clients when we engage in AUM-based fee accounts.

EXPERT COMPENSATION

Experts on the Investore platform will be compensated by Investore. Investore will consider the generated return of the expert portfolio and the number of client followers the expert has following their model portfolio.

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

Investore, Inc will not charge performance based fees.

Item 7. Types of Clients

Investore, Inc. generally provides investment advice to the following types of clients:

- Individuals
- High net worth individuals

Investore, Inc. requires each investor to maintain a minimum of \$500 USD per investment portfolio. We reserve the right to waive or reduce certain fees based on unique individual circumstances, special arrangements or preexisting relationships. We may also decline our services to a prospective client for any non-discriminatory reason.

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

Investore's technology utilizes risk questionnaires to determine clients' level of risk tolerance and provide a series of expert generated investment models. The client will need to comply with the questionnaire before requesting to open an account and receive their recommendation. To use Investore's investment services, clients inform Investore's technology of a client's financial goals and personal information through Investore's online applications. The questions can include:

- Age;
- Financial situation and needs: annual income and liquid net worth;
- Investment objectives;
- Investment time horizon; and
- Risk tolerance.

Investore's algorithm then recommends several expert-generated models from which the client can choose. The recommendations calculated through the algorithm recommended portfolios with the same or similar investment objectives interpreted from the client questionnaire. The client can also access a complete catalog of experts and their model portfolios if he or she wishes to review, by using the direct link on the Investore website homepage. In this way, the client can view a variety of model portfolios that are recommended for different investment objectives prior to completing the questionnaire.

Investore will not determine the best portfolio for each client. Instead, the portfolios recommended to the client will be ordered by several characteristics, including performance and popularity. Clients are free to accept or reject the recommendation from Investore. Clients may even select more than one of the recommended portfolios to invest in. If a client decides to reject the recommendation and select a different portfolio, they do so at their own risk. Investore will alert the client of the risks associated upon refusal of Investore's recommendation.

Clients should consider that Investore, Inc. is not designed to provide clients with a comprehensive financial plan and instead is built to advise clients on how to achieve discrete financial goals. Investore, Inc's recommendations are highly dependent on receiving accurate information from clients.

EXPERTS

Each of the expert models are portfolios that have been built from exchange-traded funds ("ETFs"). The experts that create the portfolios subscribe on the platform are vetted or invited by Investore. The expert must request registration to submit their expert models to publish on Investore. All individual experts need to have the following qualifications to be accepted as an active expert:

- Has been employed by a brokerage firm, financial institution, registered investment adviser or have similar experience.
- Experts can have any nationality.
- Have given guidance to clients about investing (experience).
- Possess a license of a financial advisor in his or her home country.
- Certifications are not required but are encouraged.
- Knowledge of ETFs.

The experts will create a limited number of portfolios by selecting only one investment objective for each portfolio, which cannot be changed in the future. For each portfolio with a determined investment objective, the expert will need to choose the ETFs that will be part of the portfolio.

At no point does the client interact with the expert. The client only has access to the expert generated models through the Investore, Inc. website. Investore will execute trades and conduct ongoing balancing. Investore will show to the client information of the experts that may include: name, picture, curriculum and social media pages.

RISK OF LOSS

Past performance is not indicative of future results. Purchasing investment products, including those outlined in this document, involves risk. The ETF market can fluctuate substantially over time with changes in the economy and demand for particular products or services. You should be aware that the purchase of securities involves the possibility of financial loss, including the loss of your original investment. Some investment instruments may have greater inherent risks than others.

ETF performance may not exactly match the performance of the index or market benchmark that the ETF is designed to track because 1) the ETF will incur expenses and transaction costs not incurred by any applicable index or market benchmark; 2) certain securities comprising the index or market benchmark tracked by the ETF may, from time to time, temporarily be unavailable; and 3) supply and demand in the market for either the ETF and/or 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. 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.

Clients should be aware that to the extent they invest in ETF securities they will pay two levels of compensation - fees charged by the Firm plus any management fees charged by the issuer of the ETF. This scenario may cause a higher cost (and potentially lower investment returns) than if a Client purchased the ETF directly.

An ETF typically includes embedded expenses that may reduce the fund's net asset value, and therefore directly affect the fund's performance and indirectly affect a Client's portfolio performance or an index benchmark comparison. Expenses of the fund may include investment adviser management fees, custodian fees, brokerage commissions, and legal and accounting fees. ETF expenses may change from time to time at the sole discretion of the ETF issuer. ETF tracking error and expenses may vary.

MINIMIZING THE RISK OF LOSS

Investore, Inc. believes the professional and disciplined execution of our investment philosophy will generate sustainable investment returns for our client accounts over time. However, the cumulative effect of company-specific risk and systemic risk of a domestic and/or global nature clearly imply that no investment is guaranteed. Clients placing funds in any of our strategies

should do so with the full knowledge that loss of principal is a real risk and the use of diversification does not assure a profit or protect against loss. Securities markets experience varying degrees of volatility and over time, your assets will fluctuate and may be worth more or less than the original amount you invested.

Item 9. Disciplinary Information

Item 9 is not applicable to this Disclosure Brochure because Investore, Inc. has no legal or disciplinary events that are material to a client's or prospective client's evaluation of our business or integrity.

Item 10. Other Financial Industry Activities and Affiliations

Investore, Inc. does not participate in other financial industry activities and affiliations.

Investore, Inc. is wholly controlled by Plataforma de Fondos SAPI de CV. The owners of Plataforma de Fondos SAPI de CV include EDVS, SA de CV, Alejandro Vazquez Enriquez, and Diego de la Campa Corcuera.

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

An investment adviser is considered a fiduciary and has a fiduciary duty to all clients. Investore, Inc. has established a Code of Ethics to comply with the requirements of the securities laws and regulations that reflects its fiduciary obligations and those of its supervised persons. The Code of Ethics also requires compliance with federal securities laws. It has no staff or additional personnel at this time. Investore, Inc. will provide a copy of its Code of Ethics to any client or prospective client upon request.

Certain related persons may hold interests in securities that are ultimately recommended to a client. This could present a conflict of interest if such a person controls or directs a client's investment. In fact, the business of Investore, Inc. includes the recommendation of securities to clients in addition to the adoption of models prepared by experts, which may present a conflict of interest.

Investore, Inc. has no access to non-public information and would not trade on such information as a matter of personal ethics.

Investore, Inc. does not buy or sell securities for clients' accounts.

Item 12. Brokerage Practices

Clients are under no obligation to act on the financial investment recommendations or investment consulting recommendations of the financial experts of Investore, Inc. You will open an account with Interactive Brokers, LLC when you start working with Investore, Inc. Investore, Inc. will assist you in the process of opening that account.

Interactive Brokers, LLC charges each client for each trade according to their terms and conditions. Interactive Brokers, LLC's SmartRouting system searches for the best ETF prices available at the time of your order, and seeks to immediately execute your order electronically. Investore, Inc. will participate in directed brokerage. Not all advisers require their clients to direct brokerage and that by directing brokerage you may be unable to achieve most favorable execution of client transactions. This practice may cost clients more money.

Interactive Brokers, LLC was selected as the preferred broker of Investore, Inc. because they remain a low-cost commission broker, compared to other market brokers. In addition, Interactive Brokers, LLC is preferred because they were awarded the best online Broker by Barron's in 2018.

Fees will be deducted from the client's assets in their Interactive Brokers, LLC brokerage account at the end of each month.

Item 13. Review of Accounts

Investore, Inc. will review client accounts to ensure a client's investment profile or circumstances have not changed. If the client circumstances have changed, the model portfolio is no longer suitable for a particular client. Investore, Inc. will review expert portfolios to make sure they are meeting certain benchmarks and are suitable investments for clients.

Item 14. Client Referrals and Other Compensation

The only compensation received from advisory services is the fees charged for providing investment advisory services as described in *Item 5* and *Item 6* of this Disclosure Brochure. Investore, Inc. receives no other forms of compensation in connection with providing investment advice.

Investore, Inc. will reward both investors and experts for bringing new clients to the platform. Investors who "refer a friend" will receive some money to invest in their account or a discount to fees. The friends they recruit will receive a similar reward.

Experts will also get extra compensation if they bring investors to the platform, regardless of whether the investor invests in that experts recommended portfolio or a portfolio recommended by another expert.

Item 15. Custody

Investore, Inc. will not have custody of any client funds. Investore, Inc. does not have custody over clients' securities. Custody, as it applies to investment advisers, has been defined by regulators as having access to control over client funds. In other words, custody is not limited to physically holding client funds and securities. If an investment adviser has the ability to access or control client funds or securities, the investment adviser is deemed to have custody and must ensure proper procedures are implemented.

Investore will not provide account statements to clients. Account statements will be provided by Interactive Brokers, LLC. Instead, Investore will direct clients to view their portfolio performance and asset allocations. Clients are encouraged to compare any reports provided by Interactive Brokers, LLC with the reports provided on the Investore platform.

Item 16. Investment Discretion

Investore, Inc. does not accept discretionary authority to manage securities accounts on behalf of its clients.

Item 17. Voting Client Securities

Investore, Inc. does not vote proxies on behalf of clients. Therefore, it is your responsibility to vote all proxies for securities held in Account. You will receive proxies directly from the qualified custodian or transfer agent; we will not provide you with the proxies.

Item 18. Financial Information

This *Item 18* is not applicable to this Disclosure Brochure. Investore, Inc. does not require or solicit prepayment of more than \$500 in fees per client, six months or more in advance. Therefore, we are not required to include a balance sheet for the most recent fiscal year. Investore, Inc. is not subject to a financial condition that is reasonably likely to impair our ability to meet contractual commitments to clients. Investore, Inc. has not been the subject of a bankruptcy petition at any time.

Item 19. Requirements for State-Registered Advisers

Executive Officer

Diego de La Campa

Educational Background:

- Bachelor of Science in Industrial Engineering
- Financial Certification from the *Mexican Association of Securities Institutions*

Business Experience:

- Columnist for *Entrepreneur Magazine*
- Founder of *Plataforma de Fondos*
- Consultant for *Investment Strategies*
- Investment Fund Promoter

Diego de La Campa has more than 15 years of experience in the mutual fund industry as a founder of a financial services company in Mexico that offers a full range of mutual funds for individual investors and institutions. He is also the founder of several fintech companies. Over the last 10 years, Diego de La Campa has raised more than 3 billion MXN pesos of investments in his business ventures.

Diego de La Campa has started one of the first financial information and research databases for mutual funds in Mexico. The database is used by financial advisors, analysts and most prestigious financial newspapers in Mexico.

Other Business Activities

See *Item 10 – Other Financial Industry Activities and Affiliations*

Performance Based Fees

As previously disclosed in *Item 6*, Investore, Inc. will not charge performance-based fees.

Item 20. Customer Privacy Policy Notice

In November of 1999, Congress enacted the Gramm-Leach Bliley Act (GLBA). The GLBA requires certain financial institutions, such as investment adviser firms, to protect the privacy of customer information. In situations where a financial institution does disclose customer information to nonaffiliated third parties, other than permitted or required by law, customers must be given the opportunity to opt out or prevent such disclosure. Investore, Inc. does not share or disclose customer information to nonaffiliated third parties except as permitted or required by law.

Investore, Inc. is committed to safeguarding the confidential information of its clients. We hold all personal information provided by clients in the strictest confidence and it is the objective of our firm to protect the privacy of all clients. Except as permitted or required by law, we do not share confidential information about clients with nonaffiliated parties. In the event that there were to be a change in this policy, we will provide clients with written notice and clients will be provided an opportunity to direct our firm as to whether such disclosure is permissible.

To conduct regular business, Investore, Inc. may collect personal information from sources such as:

- Information reported by the client on applications or other forms the client provides to our firm
- Information about the client's transactions implemented by others

- Information developed as part of financial plans, analyses or investment advisory services