

ITEM 1 - ADV PART 2A, BROCHURE

March 28, 2019



Pariter Wealth Management Group, LLC

243 Road #2

Guaynabo, PR 00966

www.pariterwmg.com

This brochure provides information about the qualifications and business practices of Pariter Wealth Management Group, LLC ("PWMG"). If you have any questions about the contents of this brochure, please contact esotomayor@pariterwmg.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.

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

Additional information about PWMG also is available on the SEC's website at www.adviserinfo.sec.gov. You can search this site by using a unique identifying number known as a CRD number. PWMG's CRD number is 146622.

ITEM 2 - MATERIAL CHANGES

The United States Securities and Exchange Commission requires that we provide to all clients an annual summary of material changes in the ADV Part 2A. This summary discusses only specific material changes that are made to the Brochure since the last revision (March 2015). We may further provide other ongoing disclosure information about material changes as necessary, at any time, without charge.

A complete Brochure may be requested by contacting Eduardo Sotomayor, Chief Compliance Officer, at esotomayor@pariterwmg.com or 787-781-2555. This Brochure is also available on our web site at www.pariterwmg.com under the Disclosure link located on the Home page.

July 2018: PWMG is switching from SEC registration to State registration

ITEM 3 - TABLE OF CONTENTS

ITEM 1 - ADV PART 2A, BROCHURE.....	1
ITEM 2 - MATERIAL CHANGES.....	2
ITEM 3 - TABLE OF CONTENTS	3
ITEM 4 - ADVISORY BUSINESS.....	4
ITEM 5- FEES AND COMPENSATION.....	6
ITEM 6 - PERFORMANCE BASED FEES and SIDE-BY-SIDE MANAGEMENT	7
ITEM 7 - TYPES OF CLIENTS	7
ITEM 8 - METHODS OF ANALYSIS, INVESTMENT STRATEGIES and RISK OF LOSS	8
ITEM 9 - DISCIPLINARY INFORMATION.....	9
ITEM 10 - OTHER FINANCIAL INDUSTRY ACTIVITIES and AFFILIATIONS.....	9
ITEM 11 - CODE OF ETHICS	9
ITEM 12 – BROKERAGE PRACTICE.....	10
ITEM 13 - REVIEW OF ACCOUNTS	11
ITEM 14 - CLIENT REFFERALS and OTHER COMPENSATION.....	11
ITEM 15 - CUSTODY	12
ITEM 16 - INVESTMENT DISCRETION.....	12
ITEM 17 - VOTING CLIENT SECURITIES	13
ITEM 18 - FINANCIAL INFORMATION.....	13
ITEM 19 - REQUIREMENTS FOR STATE-REGISTERED ADVISERS	13
ITEM 20 – OTHER INFOEMATION	15
ADV PART 2B, BROCHURE SUPPLEMENT	16

ITEM 4 - ADVISORY BUSINESS

Our Company & Principals

PWMG is an registered investment adviser with its principal place of business located in Guaynabo, Puerto Rico. It was established in February 2008. Francisco Rivera Fernandez, is its founder and President. Eduardo Sotomayor is the Chief Compliance Officer.

Type of Services We Offer

We provide investment advisory services, financial planning, tax planning, estate planning, and retirement planning for individuals, corporations, trusts, and other entities. Our investment advisory services are fee-based. Most of our client accounts are managed on a discretionary basis, although we do offer our services on a non-discretionary basis. We may also furnish advice via consultations on various matters as directed and contracted by you. Please see item 7, for the type of clients for whom we manage assets.

Customization of Accounts & Restrictions on Investments

Our services are offered to you only after obtaining detailed financial information and other pertinent dates about your current situation and financial goals. Once we have completed assessing your needs we evaluate our complete universe of investment research and managers to build the optimal portfolio with careful consideration of your risk tolerance, investment objectives, income and liquidity needs.

As mutually agreed to by us, you may restrict certain type of investments in your account.

Client Assets Managed by Us

As of December 31, 2018, our total assets under management is \$ 41,206,717. The discretionary portion of these assets is \$ 37,932,987.

Use of Sub-Advisors

PWMG may provide recommendations to the client to utilize one or more specific subadviser(s) (individually “Sub-Adviser” and collectively Sub-Advisers) to manage Account or a portion of the assets of Account. PWMG will conduct due diligence of any recommended Sub-Adviser and monitor the performance of Sub-Adviser with respect to the Sub-Advisor’s management of the designated assets of Account relative to appropriate peers and/or benchmarks. PWMG will be available to answer questions Client may have regarding any portion of Client’s Account managed by a Sub-Adviser and will act as the communication conduit between Client and the Sub-Adviser. The recommendation of Sub-Advisers, or other products and funds, may be done on a discretionary or non-discretionary basis with the specific terms outlined in the Advisory Agreement. When a client authorizes PWMG to have the ability to select Sub-Advisers or other products and funds on a discretionary basis, PWMG will have the authority to select and terminate Sub-Advisers, products or funds without the client’s specific approval.

ITEM 5- FEES AND COMPENSATION

Compensation

PWMG fees are negotiable and based upon the type of services you need, household assets under management (related accounts) and the size of your portfolio. Our maximum fee for management services will not exceed 2.0% of the total account value of your portfolio. This fee is calculated at the end of the quarter, based upon the average daily balance of your portfolio during the prior quarter. This will include cash, and cash equivalent items.

Deduction of our fees

With your authorization, the management fee(s) for your account will automatically be deducted from available cash or your money market fund.

Other Fees You May Pay

In addition to management fees your account may incur the following charges: Custody, transaction fees, transfer fees, wire fees, priority mail or postage, mutual fund fees (management & administrative), brokerage fees and commissions (or markup/down), margin interest (if margin account.)

See Item 12 for additional information about your brokerage fees.

Payment of Fees in advance and Account Termination

We will calculate your fees from the date your account is funded, pro-rated on your funding balance through the end of the quarter. That fee will be deducted from your available cash or money market account. All quarterly fees will be calculated at the end of each calendar quarter, based on the average daily balance of the account, including cash and cash equivalent items during the prior quarter, and charged in advance for the following quarter. Upon your termination of your account, your fee will be pro-rated and all unearned fees will be credited or refunded to you. You will only be charged fees for the actual days your portfolio is managed by us.

Other Compensation We May Receive

PWMG has an affiliated broker dealer, Pariter Securities, LLC (PS). As of December 2016, we no longer refer our clients to Pariter Securities for execution services but instead, will clear and custody account through TD Ameritrade or ETS Brokerage Services.

PS has an agreement in place with Axiom Capital Management, LLC ("Axiom") whereby all persons or entities referred to Ascendent Capital, LLC ("Ascendent"), a branch office of Axiom, by PS that subscribe to GPB managed funds, Axiom will assign a 40% share of Ascendent's membership interest in GPB SLP, LLC based on a pro-rata share of investors PS brings into the fund. GPB, SLP, LLC is the entity that is entitled to receive the profits allocations from GPB managed funds. This additional compensation arrangement for PS may present a conflict of interest for PWMG. In making investment recommendations, PWMG will consider your investment objectives and goals and that an investment in GPB managed funds is in your best interest.

As discussed in Item 4, PWMG offers advisory services by referring clients to third-party money managers offering asset management and other investment advisory services. Sub-advisors may charge additional fees as disclosed in the sub-advisory agreement the client signs.

Our advisory fees will not be reduced in the event of PS's receipt of other compensation. You have the option to direct the activity in your account through a broker dealer that is not affiliated with us.

For additional information please see Item 14, Client Referrals and Other Compensation.

ITEM 6 - PERFORMANCE BASED FEES and SIDE-BY-SIDE MANAGEMENT

Pariter Wealth Management Group, LLC does not manage accounts for a performance-based fee or participate in side-by-side management. Performance based fees are fees that are based on a share of capital gains or capital appreciation of a client's account. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees.

ITEM 7 - TYPES OF CLIENTS

PWMG provides investment advisory services to individuals, high net worth individuals, corporations and business owners. We also offer investment management services to pension and profit-sharing plans, institutions, foundations, and endowments.



ITEM 8 - METHODS OF ANALYSIS, INVESTMENT STRATEGIES and RISK OF LOSS

We primarily offer a fee based investment platform on a discretionary basis based on your financial goals, suitability and risk tolerance.

Our process starts with several steps of analysis for us to determine the proper and prudent recommendation(s) for your portfolio:

1. **Data Gathering** of your financial situation, goals and income or liquidity needs for your account.
2. **Analysis** of the available financial strategies applicable to your situation.
3. **Implementation** of an individualized portfolio based on the objectives you have identified.
4. **Follow up** of the investments and continuous monitoring of your portfolio.

In order to accomplish your goals, we may invest in multiple market sectors, global markets and products such as stocks, bonds, open end and closed end funds, ETF s, real estate investments trusts (REIT s), limited partnerships, private placements, annuities and others with the goal of minimizing risk and providing the proper diversification according to your stated objectives.

Through the analysis process, PWMG utilizes different sources of information and market overview such as Morningstar, Bloomberg, Thompson One Reuters, Closed End Fund Association (CEFA) and others.

Performance and capital preservation are not guaranteed; constantly changing market conditions create the necessity of constantly reevaluating your portfolio. On a periodic basis each and every position and sector of your portfolio will be analyzed. Depending on the market conditions, positions and sectors that have a poor performance and/or outlook will be taken out of the strategy. On the contrary, if a position or a sector provide a positive outlook and fits your risk tolerance and strategy; it will be implemented for your portfolio. Our asset rebalancing process is implemented according to the appreciation or depreciation of the assets in your portfolio. The overexposed positions (sectors) will be sold to acquire positions (sectors) that are underexposed in that portfolio.

One of the most important criteria to be analyzed is the cost effectiveness of the selected product(s). During the selection process, we will take into consideration aspects such as fund loads, fees and any other expense that could affect your returns.

Risk

The investment returns and principal value on the stocks, open end and closed end mutual funds, and bonds fluctuate, and may be worth more or less than their original cost. Closed end mutual funds trade on the secondary market and carry a liquidity risk; our financial consultant may utilize leverage strategies to enhanced the yield. On the other hand, leverage may increase price volatility and market risk. Investment instruments like REITs

and limited Partnerships do not trade on the secondary market and do not have immediate liquidity. You may only invest in this type of an investment if you are an accredited investor.

ITEM 9 - DISCIPLINARY INFORMATION

Registered investment advisers are required in this item to provide you with all material facts regarding any legal or disciplinary events that would be material to your evaluation of PWMG.

No disciplinary events exist for PWMG or its management. In December 2015, PWMG's affiliate, Pariter Securities, LLC was censured and fined \$10,000 by its self-regulatory agency FINRA for violations of NASD Rule 3010(a) and FINRA Rule 2010. Without admitting or denying the finding of facts, Pariter Securities, LLC consented to the sanctions and the entry of finding that it failed to adequately establish, maintain and enforce a supervisory system to prevent its registered representatives from exercising discretionary power in customer accounts prior to obtaining written authorization granted from the customers and acceptance by the firm.

ITEM 10 - OTHER FINANCIAL INDUSTRY ACTIVITIES and AFFILIATIONS

PWMG is an affiliate of Pariter Securities, LLC, a registered broker/dealer and member of FINRA (Financial Industry Regulatory Authority) and SIPC (Securities Investor Protection Corporation). PWMG is also an affiliate of Pariter Risk Management, an insurance agency. As such, investment adviser representatives of PWMG are licensed to sell securities and insurance products for separate commission based compensation. As a result of such sales activity, there may be a potential conflict of interest.

Some of the employees of PWMG may work for one, or more of the affiliated companies. However, their services are primarily offered through PWMG; the time generally spent with the other affiliates is for the purpose of executing and implementing the investment decisions made by and through PWMG.

ITEM 11 - CODE OF ETHICS

PWMG has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading,



restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at PWMG must acknowledge our Code of Ethics annually.

If you would like a copy of this document, please request it from the contact person shown on the top of this brochure.

ITEM 12 - BROKERAGE PRACTICES

A. Factors in recommending or selecting brokers to execute trades

1. Research or Soft Dollar Benefits

PWMG participates in the institutional advisor program (the “Program”) offered by TD Ameritrade Institutional. TD Ameritrade Institutional is a division of TD Ameritrade Inc., member FINRA/SIPC (“TD Ameritrade”), an unaffiliated SEC-registered broker-dealer and FINRA member. TD Ameritrade offers to independent investment advisors services which include custody of securities, trade execution, clearance and settlement of transactions. PWMG receives some benefits from TD Ameritrade through its participation in the Program. (Please see the disclosure under item 14 below.)

2. Brokerage for Client Referrals.

In our selection or recommendation of broker/dealers for your account we do not consider any referrals from any broker/dealer or third party.

3. Directed Brokerage.

Not all advisers require clients to direct brokerage. With your permission we will direct your business through one of our custodial broker/dealers ETC Brokerage Services. LLC. In the event a client directs PWMG to use another broker/dealer, the client may negotiate their own arrangement with that broker/dealer in accordance with their own needs. In this event PWMG will not be responsible for monitoring best execution.

B. Aggregation of Trades

When possible we will aggregate trades, and allocate them to the applicable account. Aggregated trades normally provide the lowest execution cost.



C. Agency Cross Securities Transactions and Principal Transactions

It is our policy that the firm will not do any “agency cross securities transactions”. An “agency cross transaction” is defined as a transaction where a person acts as an investment adviser in relation to a transaction in which the investment adviser, or any person controlled by or under common control with the investment adviser, acts as broker for both the advisory client and for another person on the other side of the transaction.

ITEM 13 - REVIEW OF ACCOUNTS

We review your account on a transactional as well as a quarterly basis. On a random basis your financial consultant’s supervisor will select accounts to review.

ITEM 14 - CLIENT REFFERALS and OTHER COMPENSATION

A solicitor is defined as a third-party (non-employee) who solicits or refers new investment advisory clients to an investment adviser. PWMG may use the services of solicitors and pay cash compensation to the solicitor for referring prospective advisory clients to PWMG. The solicitor’s cash compensation is based on a percentage of advisory fess received by PWMG from a solicited client. Client investment advisory fees are not increased as a result of payments made to solicitors.

PWMG may use research information provided by our custodians, TD Ameritrade and ETC Brokerage Services, LLC. As disclosed in Item 12 above, PWMG participates in TD Ameritrade’s institutional customer program and PWMG may recommend TD Ameritrade to Clients for custody and brokerage services. There is no direct link between PWMG’s participation in the program and the investment advice it gives to its Clients, although PWMG receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving PWMG participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance,



marketing, research, technology, and practice management products or services provided to PWMG by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by PWMG's related persons. Some of the products and services made available by TD Ameritrade through the program may benefit PWMG but may not benefit its Client accounts. These products or services may assist PWMG in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help PWMG manage and further develop its business enterprise. The benefits received by PWMG or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, PWMG endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by PWMG or its related persons in and of itself creates a potential conflict of interest and may indirectly influence PWMG's choice of TD Ameritrade for custody and brokerage services.

ITEM 15 - CUSTODY

PWMG does not have custody of any of the assets in your account. Your account assets will be held by TD Ameritrade and/or Equity Trust Company, independent, qualified custodians. Occasionally, investments in funds or private placement securities will be held directly with the fund or issuer. The custodian will send you trade confirmations for any trading that we do on your behalf. They will provide you with monthly statements that include all of the transactions in your account. If there is no activity in your account, the statement will be sent quarterly. You should review these statements promptly when you receive them.

ITEM 16 - INVESTMENT DISCRETION

Clients may engage Pariter Wealth Management Group LLC services on either a discretionary or a non-discretionary basis. In the event you decide to contract PWMG on a discretionary basis, PWMG may have broad discretionary authority to determine the time, type and amount of securities to be bought or sold. In all cases, our discretion will be exercised in a manner consistent with the stated investment objectives for your account. When we select the securities and amount of those securities, we observe the investment limitations and restrictions you have given us for your account.

PWMG will not accept discretion for the transfer of your assets, or withdrawals from your account; you must authorize such activity in writing to us.

See Item 4 above, for more information.



ITEM 17 - VOTING CLIENT SECURITIES

PWMG does not vote proxies on behalf of its investment advisory clients. You will receive proxy voting material direct from the issuer, transfer agent or custodian and will be responsible for voting your own proxies.

PWMG does not tender instructions for securities pursuant to tender offers or class actions. You will be responsible for initiating participation in tender offers or class actions by securities issuers.

ITEM 18 - FINANCIAL INFORMATION

Registered investment advisers are required in this item to provide you with certain financial information or disclosures about PWMG's financial condition. PWMG has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to its clients and has not been the subject of a bankruptcy proceeding.

ITEM 19 - REQUIREMENTS FOR STATE-REGISTERED ADVISERS

A. Principal Executive Officers and Management Persons; Their Formal Education and Business Background

Francisco Rivera Fernandez - is the Founder and President of Pariter Wealth Management Group, LLC. Information regarding the formal education and business background for Mr. Fernandez is provided in the Brochure Supplement, ADV Part 2B.

Eduardo Sotomayer – is the Chief Compliance Office for Pariter Wealth Management Group, LLC. Information regarding the formal education and business background for Mr. Sotomayer is provided in the Brochure Supplement, ADV Part 2.

B. Other Business in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (If Any)

Please refer to Item 10, "Other Financial Industry Activities and Affiliation," for information regarding other business activities of the firm and its management personnel.

C. Calculation of Performance-Based Fees and Degree of Risk to Clients

PWMG does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

D. Material Disciplinary Disclosures for Management Persons of this Firm

We are required to disclose all material facts regarding certain legal or disciplinary events pertaining to arbitration awards or other civil, regulator or administrative proceedings in which our firm or management personnel were found liable or against whom an award was granted.

Neither Partier Wealth Management Group, LLC nor any of its supervised persons have been involved in any of the following:

1. An award or otherwise being *found* liable in an arbitration claim alleging damages in excess of \$2,500, *involving* any of the following:
 - (a) an investment or an *investment-related* business or activity;
 - (b) fraud, false statement(s), or omissions;
 - (c) theft, embezzlement, or other wrongful taking of property;
 - (d) bribery, forgery, counterfeiting, or extortion; or
 - (e) dishonest, unfair, or unethical practices.
2. An award or otherwise being *found* liable in a civil, *self-regulatory organization*, or administrative *proceeding involving* any of the following:
 - (a) an investment or an *investment-related* business or activity;
 - (b) fraud, false statement(s), or omissions;
 - (c) theft, embezzlement, or other wrongful taking of property;
 - (d) bribery, forgery, counterfeiting, or extortion; or
 - (e) dishonest, unfair, or unethical practices.
3. the subject of a bankruptcy petition

E. Material Relationships that management Persons have with Issuers of Securities (if Any)

Neither Partier Wealth Management Group, LLC nor any of its management persons have any relationship with any issuer of securities.

ITEM 20 – ADDITIONAL INFORMATION

Privacy Policy Notice

Your privacy is important to us. Your personal information is kept secure. Under federal and state law, you have a right to know what information is being collected about you and how that information will be used. PWMG collects nonpublic personal information about you from the following sources:

- Information PWMG receives from you on applications or other forms.
- Information about your transactions with PWMG; and
- Information that you specifically have had your other professional advisors forward to PWMG.

PWMG does not disclose any nonpublic personal information about our customers or former customers to anyone, except as permitted or required by law, or as directed by you:

- Under law, the information PWMG collects is provided to companies that perform support services on our behalf as necessary to effect, administer, or process a transaction, or for maintaining and servicing your account;
- As directed by you, PWMG will be working with your other professional advisors and PWMG will provide information in our possession that is reasonably requested by the other advisors.

PWMG does not give or sell information about you or your accounts to any other company, individual or group. PWMG restricts access to nonpublic personal information about you to those employees who need to know that information to provide services to you. PWMG maintains physical, administrative, and technical procedural safeguards to protect your nonpublic personal information. You do not need to call or do anything as a result of this notice. It is meant to inform you of how PWMG safeguards your nonpublic personal information.

Business Continuity Plan (BCP)

PWMG has developed business continuity and information security programs that are regularly reviewed by compliance and information technology professionals in light of both current best practices and applicable regulations. Clients may obtain a copy of PWMG's Business Continuity Disclosure upon request

For more information – If you have questions about our business continuity planning, you can contact us at (787) 781-2555 or esotomayor@pariterwmg.com ADV PART 2B, BROCHURE SUPPLEMENT



MARCH 2018

Pariter Wealth Management Group, LLC

243 Road #2

Guaynabo, PR 00966

www.pariterwmg.com

787-781-2555

**FRANCISCO RIVERA FERNANDEZ
BRAULIO NIEVES ROMÁN
EDUARDO SOTOMAYOR**

This Brochure Supplement provides information about Francisco Rivera Fernandez, Braulio Nieves Román and Eduardo Sotomayor that supplements the Pariter Wealth Management, LLC Brochure. You should have received a copy of that Brochure. Please contact Eduardo Sotomayor at esotomayor@pariterwmg.com if you did not receive Pariter Wealth Management LLC's Brochure or if you have any questions about the content of this Brochure Supplement.

Additional information about Francisco Rivera Fernandez, and Braulio Nieves Román is available on the SEC's website at www.adviserinfo.set.gov. You can search this site by using a unique identifying number, known as a CRD number. Francisco Rivera Fernandez's CRD number is 2303039, and Braulio Nieves Román's CRD # is 4314517.



Francisco Rivera Fernández

1. Educational Background and Business Experience

Mr. Francisco Rivera Fernandez founded Pariter Wealth Management Group, LLC (PWMG) in 2008. He is its President and principal owner. Mr. Rivera is also the sole shareholder of Pariter Securities LLC, an affiliated broker dealer, and Pariter Risk Management, an affiliated insurance agency where he is a licensed insurance agent. Mr. Rivera has more than 20 years of experience as a financial consultant, working with the preparation and implementation of financial strategies and solutions for individual clients and business owners.

From 1991 to 2009, Mr. Rivera was a Senior. Financial Consultant with Signator Investors, where he managed and supervised portfolios for high net worth individuals and retirement plan accounts. During his last five years with Signator Investors Mr. Rivera was ranked as one of their top investment managers, and for fifteen years he was their top state level manager. Also from 1991 until 1997 he was an agent for John Hancock, after which he became an independent agent with Signator, where he qualified as a John Hancock Chairman's Council Member for 12 years. He was a two-time recipient of the John Hancock Quality Service Award, and was ranked for five years as an investment and advisory products leader. Furthermore, Mr. Rivera has received various awards and designations from Eaton Vance Funds and Oppenheimer Funds. Born in Puerto Rico in 1969, he attended the University of Puerto Rico, where he graduated Magna Cum Laude with a BS degree in Accounting and Finance. He holds the Series 6, 7, 24, 65 and 66 licenses.

2. Item Disciplinary Information:

Mr. Rivera was involved in a customer complaint that was settled in 2007, without him contributing to the settlement. Details about this event may be reviewed at: <http://www.finra.org/Investors/ToolsCalculators/BrokerCheck/>

In order to review this event, you should enter his first and last name in the pop up window.

3. Other Business Activities

Mr. Rivera is president of CCR Development, a soda concentrate manufacturing company; president of FJR Acquisition Corp., a billboard real estate company and he is in advertising services with Focal Point Media Corp.

4. Additional Compensation

Mr. Rivera as sole shareholder of Pariter Securities LLC and Pariter Risk Management will share in the profits earned by those companies.

5. Supervision

Activity in accounts managed by Mr. Rivera may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Eduardo Sotomayor, who may be reached at 787-781-2555, performs those reviews.

Braulio Nieves Román

1. Educational Background and Business Experience

Braulio Nieves Román is a Registered Investment Advisor, specializing in retirement planning, specifically in custom made strategies involving defined benefit/defined contribution plans. He also serves as president of Pariter Risk Management, an insurance agency where he is a licensed agent and Principal of Pariter Securities. Prior to joining PWMG, from 2001 to 2008, he worked as an Investment Advisor Representative with Francisco Rivera at John Hancock Financial Services and Signator Investors, as a financial planner for individuals as well as businesses. He also has over 10 years of experience in the insurance industry. Mr. Nieves graduated from the University of Puerto Rico, with a bachelor's degree in Advertising and Public Relations. He holds Series 6, 7, 63, 65, and 24.

2. Item Disciplinary Information:

Mr. Nieves has no legal or disciplinary events.

3. Other Business Activities

Mr. Nieves is not involved in any other outside business activities.

4. Additional Compensation

Mr. Nieves is compensated by Pariter Securities, LLC, and as an agent of Pariter Risk Management will receive compensation for insurance products.

5. Supervision

Activity in accounts managed by Mr. Nieves may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Eduardo Sotomayor, who may be reached at 787-781-2555, performs those reviews.

Eduardo Sotomayor

1. Educational Background and Business Experience

2. Eduardo Sotomayor is the Chief Compliance Officer of PWMG. He also serves as registered Principal, Chief Compliance Officer and head of Operations of Pariter Securities. Prior to joining PWMG, he served as registered supervisory principal with CITI International Financial Services (CIFS) from 2012 to July 2015 and as a Financial Representative from July 2015 to February 2016. Prior to that he was registered with Pariter Securities, BBVA Securities and PFS Investments Inc. He also has over 10 years of experience in the insurance industry. Mr. Sotomayor is graduate of Universidad Interamerica de PR, with a bachelor's degree in Finance. He holds FINRA licenses Series 7, 4, 24 & 63.

3. Item Disciplinary Information:

Mr. Sotomayor has no legal or disciplinary events.

4. Other Business Activities

Mr. Sotomayor is not involved in any other outside business activities.

5. Additional Compensation

Mr. Sotomayor is compensated by Pariter Securities, LLC, and as an agent of Pariter Risk Management will receive compensation for insurance products.

6. Supervision

Activity in accounts managed by Mr. Sotomayor may be reviewed on an annual or quarterly basis for conformance to the investment objective state by the client. Francisco Rivera who may be reached at 787-781-2555, performs those reviews.