



# LifeInvest Wealth Management, Ltd.

**CRD# 146966**

1110 Brickell Avenue  
Suite 210-A  
Miami, FL 33131  
(786) 523-0500

**March 2019**

This brochure provides information about the qualifications and business practices of LifeInvest Wealth Management Ltd. If you have any questions about the contents of this brochure, please contact us at (786) 523-0500 or write to [info@LifeInvestWealth.com](mailto:info@LifeInvestWealth.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. Registration of an investment adviser does not imply any level of skill or training.

Additional information about Lifeinvest Wealth Management Ltd, is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **TABLE OF CONTENTS**

<b>ITEM</b>	<b>PAGE(s)</b>
II Material Changes	3
III Advisory Business	3, 4
IV Fees and Compensation	4, 5
V Performance-Based Fees and Side-By-Side Management	5
VI Types of Clients	5
VII Methods of Analysis, Investment Strategies and Risk of Loss	5, 6
VIII Disciplinary Information	6
IX Other Financial Industry Activities and Affiliations	6
X Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	6, 7, 8
XI Brokerage Practices	8, 9, 10
XII Review of Accounts	10
XIII Client Referrals and Other Compensation	10
XIV Custody	10, 11
XV Investment Discretion	11
XVI Voting Client Securities	11
XVII Financial Information	11
XVIII Requirements for State-Registered Advisers	11

## **ITEM II MATERIAL CHANGES**

LifeInvest Wealth Management LTD has open a new office in San Diego California at 8910 University Center Lane, Suite 400, San Diego, CA, 92122.

LifeInvest Wealth Management LTD has doubled its personnel in the last six months as the company wants to keep growing in line with its business plan and provide the best advisory service.

You will receive a summary of any material changes to subsequent Brochures within 120 days of the close of our business's fiscal year, which is December 31 of each year. We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge. Currently, our Brochure may be requested by contacting us at telephone number (786) 523-0500 and / or by email at [info@LifeInvestwealth.com](mailto:info@LifeInvestwealth.com)

Additional information about Lifeinvest Wealth Management Ltd is also available via the SEC's web site [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC's web site also provides information about any persons affiliated with Lifeinvest Wealth Management Ltd, who are registered, or are required to be registered, as Investment Adviser Representatives ("IARs") of Lifeinvest Wealth Management Ltd.

## **ITEM III ADVISORY BUSINESS**

LifeInvest Wealth Management's principal service is providing fee-based investment advisory services. LifeInvest Wealth Management's primary approach is to use a fundamental allocation strategy aimed at reducing risk and increasing performance. LifeInvest Wealth Management uses exchange listed securities; securities traded over-the-counter, equity securities of foreign issuers, warrants, corporate debt securities, commercial paper, CDs, United States government securities, and options in securities and commodities to accomplish this objective.

LifeInvest Wealth Management may recommend, on occasion, redistributing investment allocations to diversify a client's portfolio in an effort to reduce risk and increase performance. LifeInvest Wealth Management may recommend specific stocks to increase sector weighting and/or dividend potential. LifeInvest Wealth Management may recommend employing cash positions as a possible hedge against market movement which may adversely affect its clients. LifeInvest Wealth Management may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of position(s), change in risk tolerance of client, or any risk deemed unacceptable for the client's risk tolerance. LifeInvest Wealth Management will provide investment advisory services; however, it will not provide securities execution, custodial and other administrative services. At no time will LifeInvest Wealth Management accept or maintain custody of a client's funds or securities.

LifeInvest Wealth Management manages approximately \$344 million in client assets as of December 31<sup>st</sup>, 2018.

## OWNERS & OFFICERS

LifeInvest Wealth Management, Ltd (“LifeInvest Wealth Management”) was incorporated on November 14, 2007. LifeInvest Wealth Management is wholly owned 33.33% by Gabriel Osio Zamora, 33.33% by Ernesto Rangel Aguilera and 33.33% by Juan Carlos Carvallo.

Gabriel Osio is Chairman of the Board, Juan Carlos Carvallo is CIO and COO, and Christian Ramirez is CCO.

## ITEM IV FEES AND COMPENSATION

### Asset Management Fees

As compensation for providing investment advisory services to clients which are referred to LifeInvest Wealth Management by third party brokerages or related persons LifeInvest Wealth Management will be paid by such third party's brokerages or related persons a fixed monthly fee as agreed to in writing between LifeInvest Wealth Management and such third-party brokerage or related person.

LifeInvest Wealth Management has a contractual arrangement with Life Invest Asset Management (formerly known as “ECG Asset Management”, a company organized under the laws of Panama) which has applied for authority to conduct brokerage activities in Panama and is wholly owned by the owners of LifeInvest Wealth Management. The agreement between LifeInvest Wealth Management and Life Invest Asset Management provides that LifeInvest Wealth Management will receive a fixed monthly payment for providing investment advisory services to Life Invest Asset Management.

As compensation for providing investment advisory services to clients originated by LifeInvest Wealth Management, clients will pay LifeInvest Wealth Management a management fee to be paid in advance on a quarterly basis pursuant to a financial advisory contract according to the following Fee Schedule:

AUM	FEES
\$20,000 TO \$250,000	2.00%
\$250,001 TO \$1,000,0000	1.75%
\$1,000,001 to \$5,000,000	1.50%
\$5,000,001 to \$10,000,000	1.00%
>\$10,000,001	0.75%

Client relationship may be established and exist where the fees are higher or lower than the Fee Schedule provide above. The Fee Schedule above may be negotiated on a case by case basis.

The Client is responsible for all custodial and securities execution fees charged by the custodian and executing broker-dealer. LifeInvest Wealth Management's fee is separate and distinct from the custodian and execution fees. LifeInvest Wealth Management's

clients have the right to use a different broker which is not affiliated with LifeInvest Wealth Management. Clients may request to terminate their advisory contract with LifeInvest Wealth Management, in whole or in part, by giving thirty (30) days advance written notice. Upon termination, any fees paid in advance will be prorated to the date of termination and any excess will be refunded to client. Client's advisory agreement with LifeInvest Wealth Management is nontransferable without client's written approval.

Fees are billed at the beginning of each quarter. These fees may be negotiated by the advisor under unusual circumstances, at the sole discretion of the advisor.

All fees paid to the Firm for investment advisory services are separate and distinct from the expenses charged by mutual funds to their shareholders and the product sponsor in the case of variable insurance products. These fees and expenses are described in each fund's or variable product's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. If the sponsor also imposes sales charges, a client may pay an initial or deferred sale or surrender charge. A client could invest in these products directly, without the services of the Firm. In that case, the client would not receive the services provided by the Firm which are designed, among other things, to assist the client in determining which products or services are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the product sponsor and the fees charged by the Firm to fully understand the total fees to be paid.

#### **ITEM V PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT**

Lifeinvest Wealth Management Ltd. Does not charge Performance Fees at this time

#### **ITEM VI TYPES OF CLIENTS**

Lifeinvest Wealth Management Ltd's clients are institutional clients that provide advisory services to wealthy individuals and families. The Firm also has clients that are high net worth individuals and families and also manage portfolios and provide investment advice for pension plans, and trusts.

Lifeinvest Wealth Management Ltd's minimum account is \$100,000. However, based on facts and circumstances Lifeinvest Wealth Management Ltd may, at its sole discretion, accept accounts with a lower value.

#### **ITEM VII METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS**

Lifeinvest Wealth Management Ltd primary approach is to use fundamental analysis. The advisor may use, but is not limited to: exchange listed securities, over-the-counter securities, foreign securities, corporate debt securities, mutual funds, United States government securities, options in securities and commodities, and futures contracts on tangibles to accomplish this objective.

The advisor measures and selects securities using sources of information to provide investment advice including research materials prepared by outside sources, corporate rating services and annual reports, prospectuses, and filings with the Securities and Exchange Commission.

LifeInvest Wealth Management's investment strategies used to implement investment advice given to our clients include long term purchases. The advisor may recommend employing cash positions as a possible hedge against market movement which may adversely affect the portfolio. The advisor may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position(s) in the portfolio, change in risk tolerance of client, or any risk deemed unacceptable for the client's risk tolerance.

There is a substantial risk of loss in trading in securities and other financial instruments that you, as the investor, should be prepared to bear. Past results are no guarantee of future performance. You should carefully consider whether trading is appropriate for you in light of your experience, objectives, financial resources and other relevant circumstances. Trading in futures and options is not suitable for many members of the public.

#### **ITEM VIII DISCIPLINARY INFORMATION**

Neither Lifeinvest Wealth Management Ltd nor any employee of the firm has been subject to any disciplinary actions by the Securities Exchange Commission (SEC) or any other regulatory authority.

#### **ITEM IX OTHER FINANCIAL INDUSTRY ACTIVITIES, BUSINESS ACTIVITIES AND AFFILIATIONS**

Lifeinvest Wealth Management Ltd may receive compensation for selling certain products from third parties. The payments may include distribution fees (including 12b-1 fees), trailer fees, loads or contingent deferred sales charges. At the client's request, Lifeinvest Wealth Management Ltd will forward all pertinent information regarding these products and services, including product name, characteristics, offering, fees, commissions and risks, to them.

LifeInvest Wealth Management, LTD. has the following affiliations as a result of common ownership:

LifeInvest Asset Management. (formally known as ECG, Broker/dealer organized under the laws of Panama. Formerly known as ECO Group Casa de Valores)

#### **ITEM X CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING**

LifeInvest Wealth Management complies with The Insider Trading and Securities Fraud Enforcement Act of 1988 LifeInvest Wealth Management monitors the LifeInvest Wealth

Management personal securities transactions of all access persons. In addition, LifeInvest Wealth Management has adopted a written Code of Ethics in compliance with SEC Rule 204A-1. This Code is based on the principle that the officers, directors, and employees (or persons having similar status or function) of LifeInvest Wealth Management have a fiduciary duty to place the interests of the clients ahead of their own interests. The Code applies to all supervised persons and focuses principally on monitoring and reporting of personal transactions in securities. Supervised persons must avoid activities, interests and relationships that might interfere with making decisions in the best interests of clients. LifeInvest Wealth Management adheres to the following principles:

- We abide by Fiduciary Duty principles. Our duty is at all times to place the interests of our clients first. Supervised persons must avoid putting their own personal interests ahead of the interests of our clients. A supervised person may not induce or cause a client to take action, or not to take action, for personal benefit, rather than for the benefit of the client.
- All personal securities transactions will be conducted in such a manner as to be consistent with the Code of Ethics and to avoid any actual or potential conflict of interest or any abuse of a supervised person's position of trust and responsibility.
- Access persons must regularly submit reports LifeInvest Wealth Management disclosing their beneficial ownership of securities and the acquisition and disposition of such beneficially owned securities. These reports shall detail the (i) title and type of security; (ii) exchange ticker symbol or CUSIP number as applicable; (iii) number of shares; (iv) principal amount of each security; (v) name of any broker, dealer, or bank with which the access person maintains an account in which any securities are held for the access person's direct or indirect benefit; (vi) date that the access person submits the report; (vii) nature of the transaction (i.e., purchase, sale, or other type of acquisition or disposition); (viii) price of the security at which the transaction was affected; (ix) name of the broker, dealer, or bank with or through which the transaction was affected; (ix) name of the broker, dealer, or bank with or through which the transaction was effected; and (x) date the access person submits the report, as applicable.
- All trading by supervised persons must give preference to client portfolios. Specifically, no supervised person may (i) purchase securities for himself or an account over which he has control or a beneficial interest in until all LifeInvest Wealth Management client accounts to which such security has been recommended have acquired all sought positions, or (ii) sell for himself or an account over which he has control or a beneficial interest in until all LifeInvest Wealth Management client accounts for which such security has been recommended to sell have sold such security.
- All supervised persons must; promptly, completely, and truthfully answer client inquiries; maintain the confidentiality of all information that our clients have entrusted to LifeInvest Wealth Management concerning its clients even if they leave LifeInvest Wealth Management; fully comply with all federal laws, rules, and regulations governing the provision of investment advisory services to clients; and promptly report any circumstances which appear to be or could be a violation of this Code to LifeInvest Wealth Management's Chief Compliance Officer.



The Chief Compliance Officer of LifeInvest Wealth Management carries out all compliance-related mandates as set forth by the Code of Ethics. A copy of the firm's Code of Ethics is available upon request by all clients and prospective clients. Lifeinvest Wealth Management Ltd and/or its investment advisory representatives may from time to time purchase or sell products that they may recommend to clients.

The Firm prohibits itself and its associated persons from benefiting from the short-term market effects of transactions for clients. The Firm gives preference to clients trading over itself. The compliance officer reviews all transactions executed by the Firm daily and conducts an additional review of all securities transactions by officers and employees quarterly.

Certain financial products and services offered by Lifeinvest Wealth Management Ltd are not available to investors in the US (US investors).

## ITEM XI BROKERAGE PRACTICES

LifeInvest Wealth Management does not provide trade execution services for its advisory clients. Instead LifeInvest Wealth Management recommends, but does not require, that its clients execute their trades for their account(s) through its affiliate, Life Invest Asset Management, which has entered into commission-sharing arrangements with Julius Baer Bank, BSI Switzerland ("BSI") and Santander Suisse for such referrals.

Each advisory client remains free to negotiate brokerage commission rates with Life Invest Asset Management, as introducing broker, and the executing brokers identified in this paragraph. By directing brokerage clients may be unable to achieve most favorable execution of client transactions, and this practice may ultimately cost more money. Despite these existing arrangements, LifeInvest Wealth Management's clients have the right to use a different broker for their trade executions; currently, however, none of our advisory clients uses unaffiliated brokerage services.

The commission-sharing arrangements by and among Life Invest Asset Management, Julius Bear Bank, BSI and Santander Suisse indirectly benefit LifeInvest Wealth Management, creating a potential conflict of interest when LifeInvest Wealth Management recommends (but does not require) its clients to execute their trades through Life Invest Asset Management. Even though LifeInvest Wealth Management only suggests that its clients open account(s) with its affiliate, LifeInvest Asset Management, LifeInvest Wealth Management will disclose these commission-sharing arrangements to its clients orally when discussing the nature of the services LifeInvest Wealth Management provides and in its investment advisory agreement with each client. LifeInvest Wealth Management believes this disclosure will adequately guide its clients' decision as to which broker to select for trade execution.

**Best Execution:** As an investment advisory firm, the Firm has a fiduciary duty to seek best execution for client transactions. While best execution is difficult to define and challenging to measure, there is some consensus that it does not solely mean the achievement of the best price on a given transaction. Rather, it appears to be a collective consideration of factors concerning the trade in question. Such factors include the security



being traded, the price of the trade, the speed of the execution, apparent conditions in the market, and the specific needs of the client. The Firm may not necessarily pay the lowest commission or commission equivalent as specific transactions may involve specialized services on the part of the broker.

This would justify higher commissions (or their equivalent) than other transactions requiring routine services. If the Firm is directed by the client to direct trades to a specific broker dealer other than the custodian typically used for trade execution, it is disclosed that the Firm's ability to negotiate commissions (where applicable), obtain volume discounts, or otherwise obtain best execution may not be as favorable as might otherwise be obtained.

**Order Aggregation:** The Firm may combine orders into block trades when more than one account is participating in the trade. This blocking or bunching technique must be equitable and potentially advantageous for each such account (e.g. for the purposes of reducing brokerage commissions or obtaining a more favorable execution price). Block trading is performed when it is consistent with the duty to seek best execution and is consistent with the terms of the Firm's investment advisory agreements. Equity trades are blocked based upon fairness to client, both in the participation of their account, and in the allocation of orders for the accounts of more than one client. Allocations of all orders are performed in a timely and efficient manner. All managed accounts participating in a block execution receive the same execution price (average share price) for the securities purchased or sold in a trading day. Any portion of an order that remains unfilled at the end of a given day will be rewritten on the following day as a new order with a new daily average price to be determined at the end of the following day. Due to the low liquidity of certain securities, broker availability may be limited. Open orders are worked until they are completely filled, which may span the course of several days. If an order is filled in its entirety, securities purchased in the aggregated transaction will be allocated among the accounts participating in the trade in accordance with the allocation statement. If an order is partially filled, the securities will be allocated pro rata based on the allocation statement. The Firm may allocate trades in a different manner than indicated on the allocation statement (non-pro rata) only if all managed accounts receive fair and equitable treatment.

The Firm may recommend brokers to clients for execution and/or custodial services where requested by the client. Clients are not obligated to use the recommended broker and will not incur any extra fee or cost associated with using a broker not recommended by the Firm. Lifeinvest Wealth Management Ltd may recommend brokers based on criteria such as, but not limited to, reasonableness of commissions charged to the client, services made available to the client, and location of broker offices.

The Firm does not receive research services, other products, or compensation as a result of recommending a particular broker which may result in the client paying higher commissions than those obtainable through other brokers.

Lifeinvest Wealth Management Ltd never discloses the nonpublic personal information collected about its clients to anyone except in furtherance of our business relationship, and then only to those persons necessary to execute the transactions and provide the services that Client authorize (such as broker-dealers, custodians, investment managers etc.) or as otherwise provided by law.

A copy of Lifeinvest Wealth Management Ltd's Business Continuity Plan Disclosure Document will be provided to the Client at the time of account opening as well as when material changes to the plan occur. A copy of this document may be obtained at any time upon request.

## **ITEM XII REVIEW OF ACCOUNTS**

LifeInvest Wealth Management reviews the holdings of individual accounts. Client accounts will be reviewed on a quarterly basis though clients may also request a review by LifeInvest Wealth Management of their objectives and holdings on an off-cycle basis. Any development affecting a client's holdings will trigger a review and appropriate advice being given. A continuous and ongoing review will be made of securities held by clients as well as a broad group of other securities in order to determine what changes, if any, should be suggested to clients. In addition, the client will receive other supporting reports from Mutual Funds, Asset Managers, Trust Companies or Custodians, Insurance Companies, Broker/Dealers and others who are involved with client accounts.

Monica Calabrese (Relationship Manager) and Juan Carlos Carvallo (CIO and COO) will conduct the quarterly review of client holdings. Ms. Calabrese will review all of the clients for which reviews are to be conducted and all such reviews will be performed at identical review levels.

Client will receive prompt notification of any investment recommendation made for the Client's Portfolio as well a monthly or quarterly statement (as applicable) showing Client's Portfolio and a review of all transactions occurring during the applicable period.

## **ITEM XIII CLIENT REFERRALS AND OTHER COMPENSATION**

Lifeinvest Wealth Management Ltd, from time to time, receives client referrals, and such referrals often come from current clients, attorneys, accountants, employees, personal friends of employees and other similar sources.

The Adviser may enter into agreement whereby a party unaffiliated with the Adviser is entitled to compensation in the event that such party solicits prospective clients who become Adviser's clients. Pursuant to the Agreement, the solicitor will provide each prospective client with a copy of the Adviser's Form ADV Part 2A and 2B and a disclosure document setting forth the terms of the solicitation agreement, including the nature of the relationship between the solicitor and the Adviser and any fees to be paid to the solicitor. Where applicable, cash payments for client solicitations will be structure to comply fully with the requirements of Rule 206(4)-3 under the Advisers Act.

Lifeinvest Wealth Management Ltd does not currently maintain any Referral Agreements.

## **ITEM XIV CUSTODY**

The Firm provides investment advisory services and portfolio management services and does not provide securities custodial or other administrative services. At no time will the firm accept or maintain custody of a client's funds or securities.

On special circumstances, the Firm may have authority over bank accounts in name of a client, in order to facilitate the payment of fees or other administrative expenses related to the advice provided to the client.

#### **ITEM XV INVESTMENT DISCRETION**

The Firm offers clients both a Discretionary and Non-Discretionary investment advisory services. On Discretionary accounts, the Firm could have discretion over the selection and amount of securities to be bought or sold in client accounts without obtaining prior consent or approval from the client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the client and agreed to by the Firm.

Discretionary authority will only be authorized upon full disclosure to the client. The granting of such authority will be evidenced by the client's execution of an Investment Advisory Agreement containing all applicable limitations to such authority.

#### **ITEM XVI VOTING CLIENT SECURITIES**

The Firm will not vote, nor advise clients how to vote, proxies for securities held in client accounts. The client clearly keeps the authority and responsibility for the voting of these proxies. Also, the Firm cannot give any advice or take any action with respect to the voting of these proxies. The client and the Firm agree to this by contract. For accounts subject to the provisions of the Employee Retirement Income Security Act of 1974 ("ERISA"), the plan fiduciary specifically keeps the authority and responsibility for the voting of any proxies for securities held in plan accounts. Also, the Firm cannot give any advice or take action with respect to the voting of these proxies.

#### **ITEM XVII FINANCIAL INFORMATION**

Lifeinvest Wealth Management Ltd does not maintain any impairments or financial obligations that might prevent it from meeting any contractual obligation to its clients.

#### **ITEM XVIII REQUIREMENTS FOR STATE-REGISTERED ADVISERS (N/A)**