

# **InvestPlex LLC**

## **Form ADV Part 2A – Disclosure Brochure**

**Effective: March 19, 2019**

This Form ADV 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of InvestPlex LLC (“InvestPlex” or the “Advisor”). If you have any questions about the contents of this Disclosure Brochure, please contact us via our website <http://investplex.com>.

InvestPlex is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). The information in this Disclosure Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information through InvestPlex to assist you in determining whether to retain the Advisor.

Additional information about InvestPlex and its advisory persons are available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching by our firm name or by our CRD# 283666.

**InvestPlex LLC**  
**17555 Collins Avenue, Suite 1708, Sunny Isles Beach, FL 33160**  
<http://investplex.com>

## Item 2 – Material Changes

---

Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about advisory personnel of InvestPlex.

InvestPlex believes that communication and transparency are the foundation of its relationship with Clients and will continually strive to provide its Clients with complete and accurate information at all times. InvestPlex encourages all current and prospective Clients to read this Disclosure Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback.

### Material Changes

This is the initial filing of the Disclosure Brochure.

### Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of InvestPlex.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching for our firm name or our CRD# 283666.

You may also request a copy of this Disclosure Brochure at any time, by contacting us via our website <http://investplex.com>.

## Item 3 – Table of Contents

---

|  |          |
|--|----------|
| <b>Item 1 – Cover Page .....</b>   | <b>1</b> |
| <b>Item 2 – Material Changes .....</b>   | <b>2</b> |
| <b>Item 3 – Table of Contents.....</b>   | <b>3</b> |
| <b>Item 4 – Advisory Services.....</b>   | <b>4</b> |
| A. Firm Information.....   | 4        |
| B. Advisory Services Offered .....   | 4        |
| C. Client Account Management.....  | 4        |
| D. Wrap Fee Programs .....   | 5        |
| E. Assets Under Management .....   | 5        |
| <b>Item 5 – Fees and Compensation .....</b>  | <b>5</b> |
| A. Fees for Advisory Services .....  | 5        |
| B. Fee Billing.....  | 5        |
| C. Other Fees and Expenses .....   | 5        |
| D. Advance Payment of Fees and Termination.....  | 5        |
| E. Compensation for Sales of Securities .....  | 5        |
| <b>Item 6 – Performance-Based Fees and Side-By-Side Management.....</b>                                      | <b>5</b> |
| <b>Item 7 – Types of Clients .....</b>   | <b>5</b> |
| <b>Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss .....</b>                            | <b>6</b> |
| A. Methods of Analysis .....   | 6        |
| B. Risk of Loss .....  | 6        |
| <b>Item 9 – Disciplinary Information.....</b>  | <b>6</b> |
| <b>Item 10 – Other Financial Industry Activities and Affiliations .....</b>                                  | <b>6</b> |
| <b>Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading .....</b> | <b>6</b> |
| A. Code of Ethics.....   | 6        |
| B. Personal Trading with Material Interest.....  | 6        |
| C. Personal Trading in Same Securities as Clients .....  | 6        |
| D. Personal Trading at Same Time as Client .....   | 7        |
| <b>Item 12 – Brokerage Practices .....</b>   | <b>7</b> |
| A. Recommendation of Custodian[s].....   | 7        |
| <b>Item 13 – Review of Accounts.....</b>   | <b>7</b> |
| A. Frequency of Reviews .....  | 7        |
| B. Causes for Reviews .....  | 7        |
| C. Review Reports .....  | 7        |
| <b>Item 14 - Client Referrals and Other Compensation .....</b>   | <b>7</b> |
| A. Compensation Received by InvestPlex.....  | 7        |
| B. Client Referrals from Solicitors.....   | 7        |
| <b>Item 15 – Custody.....</b>  | <b>7</b> |
| <b>Item 16 – Investment Discretion .....</b>   | <b>7</b> |
| <b>Item 17 – Voting Client Securities .....</b>  | <b>8</b> |
| <b>Item 18 – Financial Information.....</b>  | <b>8</b> |

## Item 4 – Advisory Services

---

### A. Firm Information

InvestPlex LLC (“InvestPlex” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”) conducting business as an “Internet-only” advisor pursuant to Section 203A-2(e) of the Investment Advisers Act of 1940, as amended (the “Advisers Act”).

InvestPlex is organized as a Limited Liability Company (“LLC”) under the laws of the State of Florida. InvestPlex was founded in March 2016, and is owned and operated by Jorge A. Betancourt Carreno (Managing Member and Chief Compliance Officer). This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by InvestPlex.

### B. Advisory Services Offered

InvestPlex provides an interactive website ([www.investplex.com](http://www.investplex.com), herein referred to as the “Site”) that empowers subscribed Users (each a “Client”) to utilize its online tools and methodologies to create and self-manage a low-cost investment portfolio. Through the Site, the Client can define the appropriate investment portfolio that aligns with their investment goals, time horizon and tolerance for risk. The Client can leverage the Site to implement their tailored institutional investment process:

1. Investment Policy Statement (“IPS”)
2. Strategic Asset Allocation
3. Investment Product Selection
4. Monitoring and Rebalancing

#### InvestPlex Investment Philosophy

InvestPlex applies Modern Portfolio Theory (“MPT”) when building portfolios. Rather than looking at the risk (volatility) of an individual exchange-traded fund (“ETF”), InvestPlex software analyzes how adding that ETF contributes to the volatility of the overall portfolio. The idea behind this is to select ETFs with prices that move differently under the same market conditions (this is called low correlation).

InvestPlex monitors the Client’s investment selection 24/7 and recommends adjustments depending on the degree to which the Client’s current asset allocation has drifted away from its target asset allocation. The InvestPlex algorithms will maintain the portfolio’s risk level close to your own level of risk tolerance.

InvestPlex does not manage Client investment assets and does not have access to Client investment accounts. Clients are responsible to implement their investment portfolio and any recommendations provided by the Advisor. Clients are not required to implement their investment portfolio following the advice provided by InvestPlex.

#### Limited Access to Advisor

The Advisor serves as an “Internet-Only” investment advisor pursuant to Section 203A-2(e) of the Advisers Act. Under this registration the Advisor provides its investment advice solely through its interactive website. Pursuant to regulations, the Advisor is not available to Clients for telephone conversations or communications through other means such as U.S. mail, courier or email (other than operational emails). The Advisor does not meet with Client’s at its offices or any location. All advice, support and inquiries are delivered through the Advisor’s website.

The Advisor may, for a limited number of Clients annually, provide customized services, subject to the limitations set forth in Section 203A-2(e) of the Advisers Act.

### C. Client Account Management

Prior to engaging InvestPlex to provide investment advisory services, each Client is required to enter into an Investor Services Agreement with the Advisor that defines the terms, conditions, authority and responsibilities of the Advisor and the Client. Each Client shall establish an online account on the InvestPlex Site for access to the Advisor’s services.

#### **D. Wrap Fee Programs**

InvestPlex does not manage or place Client assets into a wrap fee program.

#### **E. Assets Under Management**

The Advisor does not provide investment management services and therefore has not response for this Item.

### **Item 5 – Fees and Compensation**

---

The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client shall enter into an Investor Services Agreement that details the responsibilities of InvestPlex and the Client.

#### **A. Fees for Advisory Services**

InvestPlex charges a subscription fee for its service which is charged either monthly in advance at a rate of \$8.99 per month or a fixed annual fee of \$85.99 per year.

#### **B. Fee Billing**

Subscriptions are charge in advance of the period selected by the Client and billed to the credit card provided.

#### **C. Other Fees and Expenses**

Clients may incur certain fees or charges imposed by third parties, other than InvestPlex, in connection with the implementation of any portfolios recommended by InvestPlex. As InvestPlex does not manage the Client's investment portfolio, the Client must select a broker-dealer/custodian for the implementation of portfolio recommendations. The Client is responsible for all custody and securities execution fees charged by their selected broker-dealer/custodian. The subscription fee charged by InvestPlex does not include investment management services or any custody and execution fees.

In addition, ETFs have an internal expense ratio. These fees and expenses are described in each ETF's prospectus. These fees and expenses will generally be used to pay management fees and operating costs for the ETF. InvestPlex does not share in any of these fees.

#### **D. Advance Payment of Fees and Termination**

If the Client cancels its subscription agreement within five (5) days of the start of the subscription, then fees will be refunded in full. Following the 5<sup>th</sup> day of the subscription and thereafter, a Client may terminate at any time, but are subject to the Advisor's fees. Monthly fees will not be pro-rated upon termination. Termination will become effective at the end of the month in which the subscription is cancelled. Annual subscription fees will be refunded for any full months paid. Partial month fee in the month of cancelation are not refunded.

#### **E. Compensation for Sales of Securities**

InvestPlex does not buy or sell securities and does not receive any compensation for securities transactions in any Client account, other than the investment advisory fees noted above.

### **Item 6 – Performance-Based Fees and Side-By-Side Management**

---

InvestPlex does not charge performance-based fees for its investment advisory services. The fees charged by InvestPlex are as described in "Item 5 – Fees and Compensation" above and are not based upon the capital appreciation of the funds or securities held by any Client. InvestPlex does not manage any proprietary investment funds or limited partnerships.

### **Item 7 – Types of Clients**

---

InvestPlex provides advisory services its interactive web site, <http://investplex.com>. The relative percentage of each type of Client is available on InvestPlex's Form ADV Part 1. These percentages will change over time. InvestPlex generally does not impose a minimum size for establishing a relationship.

---

InvestPlex LLC

17555 Collins Avenue, Suite 1708, Sunny Isles Beach, FL 33160

<http://investplex.com>

## **Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss**

---

### **A. Methods of Analysis**

InvestPlex provides an online ETF Portfolio Management Tool that uses technology and Modern Portfolio Theory (MPT) to assist Clients in building and managing a low-cost ETF investment portfolio. InvestPlex believes that low-cost investments (ETFs) that are properly diversified and allocated according to the Client's investment goals, time horizon and tolerance for risk.

InvestPlex technology and methods employ both fundamental and technical analysis methods in developing investment recommendations for its Clients. Research and analysis from InvestPlex is derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

### **B. Risk of Loss**

Past performance is not a guarantee of future returns. Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. InvestPlex will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Additional details regarding the risks associated with a Client's investment portfolio are also provided on the Advisor's website.

## **Item 9 – Disciplinary Information**

---

There are no legal, regulatory or disciplinary events involving InvestPlex or its Supervised Persons. InvestPlex and its advisory personnel value the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider with whom you partner. Our backgrounds are on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching for our firm name or by our CRD# 283666.

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

---

InvestPlex does not have other financial industry activities or affiliations.

## **Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

---

### **A. Code of Ethics**

InvestPlex has implemented a Code of Ethics that defines our fiduciary commitment to each Client. This Code of Ethics applies to all Supervised Persons associated with InvestPlex (herein our "Supervised Persons"). The Code of Ethics was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. InvestPlex and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of InvestPlex Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code of Ethics covers a range of topics that address employee ethics and conflicts of interest. To request a copy of our Code of Ethics, please contact us via our interactive web site <http://investplex.com>.

### **B. Personal Trading with Material Interest**

InvestPlex allows our Supervised Persons to purchase or sell the same securities that may be recommended to Clients. InvestPlex does not trade in Client accounts and therefore does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund, or advise an investment company. InvestPlex does not have a material interest in any securities traded in Client accounts.

### **C. Personal Trading in Same Securities as Clients**

InvestPlex allows its Supervised Persons to purchase or sell the same securities that may be recommended to Clients. Owning the same securities, we recommend to you presents a potential conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted, consistent with Section 204A of the Investment Advisers Act of 1940, a Code of Ethics, which

addresses insider trading (material non-public information controls) and personal securities reporting procedures. When trading for personal accounts, Supervised Persons of InvestPlex may have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can potentially be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. InvestPlex does not trade in Client accounts, which mitigates this conflict. This risk is further mitigated by InvestPlex requiring reporting of personal securities trades by its Supervised Persons for review by the Chief Compliance Officer ("CCO"). InvestPlex has also adopted written policies and procedures to detect the misuse of material, non-public information.

#### **D. Personal Trading at Same Time as Client**

InvestPlex does not trade in Client accounts. **At no time will InvestPlex, or any Supervised Person of InvestPlex, transact in any security to the detriment of any Client.**

### **Item 12 – Brokerage Practices**

---

#### **A. Recommendation of Custodian[s]**

InvestPlex does not manage Client investment portfolios. Clients must implement their own investment portfolios. Therefore, the Advisor does not recommend or select the custodian or broker-dealer.

### **Item 13 – Review of Accounts**

---

#### **A. Frequency of Reviews**

InvestPlex model portfolios are monitored on a regular and continuous basis by InvestPlex algorithms and technology. The Client's actual investment portfolio [if applicable] is solely the responsibility of the Client. InvestPlex does not have access to view, trade or monitor a Client's actual investment portfolio.

#### **B. Causes for Reviews**

Not applicable.

#### **C. Review Reports**

The Client will receive information on the investment models for which the Client is subscribed through the InvestPlex.com online portal. The Advisor may also provide Clients with periodic reports regarding securities and markets.

### **Item 14 - Client Referrals and Other Compensation**

---

#### **A. Compensation Received by InvestPlex**

InvestPlex is a fee-only advisory firm, who, in all circumstances, is compensated solely by the Client. InvestPlex does not receive commissions or other compensation from product sponsors, broker-dealers or any un-related third party. InvestPlex may refer Clients to various third parties to provide certain financial services necessary to meet the goals of its Clients. Likewise, InvestPlex may receive referrals of new Clients from a third-party.

#### **B. Client Referrals from Solicitors**

InvestPlex does not engage paid solicitors for Client referrals.

### **Item 15 – Custody**

---

InvestPlex does not accept or maintain custody of any Client accounts. Clients are required to select their own custodian to retain their funds and securities, as applicable.

### **Item 16 – Investment Discretion**

---

InvestPlex does not manage Client assets and therefore has no disclosure for this Item.

## **Item 17 – Voting Client Securities**

---

InvestPlex does not accept proxy-voting responsibility for any Client. The Client retains the sole responsibility for proxy decisions and voting.

## **Item 18 – Financial Information**

---

Neither InvestPlex, nor its management, have any adverse financial situations that would reasonably impair the ability of InvestPlex to meet all obligations to its Clients. Neither InvestPlex, nor any of its Supervised Persons, has been subject to a bankruptcy or financial compromise. InvestPlex is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect fees of \$1,200 or more for services to be performed six months or more in advance.