



## Part 2A of Form ADV Firm Brochure

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As of: December 31, 2023

This Brochure (the “Brochure”) provides information about the qualifications and business practices of LXG Wealth Advisory LLC (“LXG” or “the Firm”). If you have any questions about the contents of this Brochure, please contact us at [compliance@lxgwa.com](mailto:compliance@lxgwa.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (the “SEC”) or by any state securities authority.

Additional information about LXG Wealth Advisory LLC is also available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You may also request a copy of our Brochure by contacting us at +1 (305) 305-456-7645 or [compliance@lxgwa.com](mailto:compliance@lxgwa.com).

LXG Wealth Advisory LLC is a registered investment adviser. Registration of an investment adviser does not imply that LXG or any of our principals or employees possesses a particular level of skill or training.

## **Item 2 – Material Changes**

LXG is required to advise you of any material changes to our business since our last annual update.

You will receive a summary of any material changes to this and subsequent brochures within 120 days and without charge. You may also request a copy of the brochure by contacting us at 305-456-7645 and/or by writing us an email at [compliance@lxgwa.com](mailto:compliance@lxgwa.com).

Information about LXG is also available through the SEC's public disclosure website ("IAPD" at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)). The SEC's website also provides information about any persons affiliated with LXG who are registered, or are required to be registered, as investment adviser representatives of LXG.

LXG has amended this brochure to clarify the type of clients it renders investment advisory services to and to reflect its assets under management (as of December 31, 2023) and to provide greater clarity on potential conflict of interest it may have.

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#### **Item 4 – Advisory Business**

LXG is organized as a Florida limited liability company under the laws of the State of Florida and is a registered Investment Adviser with the SEC. LXG has been in business since May 2021. LXG is wholly owned by LXG Capital, LLC, a Delaware corporation and by Mr. Felix Segura. LXG Capital, LLC is an affiliate of LXG Group based in Lima Perú. LXG Group affiliates in Perú provide investment banking, asset management and wealth advisory services to high-net-worth individuals and entities in Perú.

LXG Capital's clients are organizations with business interests in Latin America and include corporations, financial institutions, private equity funds and private families.

LXG provides investment advisory services to high-net-worth individuals, families, estates, trusts, corporations, or other qualified entities ("Clients"). The Firm works with clients to help them define appropriate investment objectives and to design and implement an investment process and individualized strategies with client unique asset allocations that seeks to achieve those objectives. The client will be provided with an Investment Policy Statement that will include the recommended asset allocation strategy.

LXG investment advisory services include, but are not limited to, asset allocation analysis, instrument and security selection, performance reporting, and portfolio monitoring. LXG provides advisory services to Clients on a non-discretionary and discretionary basis. With respect to non-discretionary Clients, if the Client approves LXG's asset allocation and recommendation, the Firm can arrange or effect the approved transaction at the request and on behalf of the Client, if authorized to do so by the Client. Otherwise, it is incumbent upon the client to implement the recommended strategy. With respect to discretionary Clients, the Firm arranges or effects transactions on behalf of the Client in order to implement the agreed upon investment strategy (please refer to the section on Investment Discretion for additional information on discretionary Clients).

LXG does not and will not have custody of client assets. Clients select the financial institutions that custody their assets. LXG can recommend a particular custodian to our Clients, at their request, but the Firm does not receive any compensation from the custodians for such recommendations (please refer to the section on Brokerage Practices for additional information). LXG assists Clients in establishing investment objectives, return expectations, risk tolerance, measuring time horizons for their strategies, liquidity needs, and other Client-specific requirements, which are set forth in the Client's Investment Policy Statement. The Investment Policy Statement also includes specific portfolio management parameters and associated restrictions by instrument type, asset class, sector, and geography, as applicable.

Based on the Investment Policy Statement, LXG offers investment advisory services regarding the following instruments, and, on occasion, others not included below:

- Fixed income, including, but not limited to, investment grade and high yield corporate bonds
- Municipal securities
- Exchange traded funds
- Equity securities: exchange listed, over the counter, and foreign securities

- Private equity funds and direct private equity
- Private debt funds and direct private debt investments
- Real Estate funds and direct real estate investments
- Hedge funds and other alternative investments
- Certificates of deposit
- Managed accounts
- Mutual funds
- Options and other derivative products

From time to time, LXG offers non-advisory services to its clients including, but not limited to, reporting services and the coordination of the following: recommendations on legal representation and strategic business planning, wealth transfer planning, estate planning, research on trustee placement, and select administrative services. However, LXG does not provide legal or tax advice.

Clients may impose reasonable restrictions on investing in certain securities or types of securities for their account(s). When a client requests certain restrictions, LXG will review these and determine, in its sole discretion, if the conditions would materially impact the performance of a management strategy or prove overly burdensome to the Firm's account management efforts before accepting such restrictions. If LXG determines that the restrictions prove to have a material impact to the strategy designed, LXG will notify the client that it can not continue with the advisory relationship.

The Firm currently manages approximately \$ 1,448,373,489 net assets on both a discretionary basis and non-discretionary basis.

## Item 5 – Fees and Compensation

LXG charges Clients an Advisory Fee for services provided. The Advisory Fee is established and defined in the Investment Advisory Agreement between LXG and the Client (the “Advisory Agreement”). Generally, the Advisory Fee is expressed as a percentage of Assets Under Management (“AUM”), and typically ranges from 0.35% to 1% of total AUM, with a minimum annual Advisory Fee. LXG’ fee schedule is generally as follows:

<u>Annual Fee</u>	<u>Assets Under Management</u>
Up to 1.0%:	For AUMs lesser than \$10 million
Up to 0.80%:	For AUM from \$10 million up to \$15 million
Up to 0.75%:	For AUM from \$15 million up to \$20 million
Up to 0.70%:	For AUM from \$20 million up to \$25 million
Up to 0.65%:	For AUM from \$25million up to \$50 million
Up to 0.55%:	For AUM from \$50 million up to \$100 million
Up to 0.50%:	For AUM from \$100 million up to \$150 million
Up to 0.45%:	For AUM from \$150 million up to \$200 million
Up to 0.35%:	For AUM above 200 million

There is typically a minimum annual Advisory Fee-. In some instances, Advisory Fees are negotiable based upon the types of assets included in a Client’s portfolio, the complexity and size of the portfolio, the services to be provided, and other factors including the nature of the Client’s objectives as articulated in the Investment Policy Statement.

Generally, Advisory Fees are calculated and billed on a quarterly basis, payable in advance. Some Clients’ fee schedules and billing procedures may differ from the general process described herein, as provided in such Clients’ Advisory Agreements. Clients can elect to be billed directly for fees or to authorize LXG to directly debit fees from client accounts at the custodian. Upon termination of any account, any unearned fees will be promptly refunded

Advisory Fees are based on the value of the Client’s portfolio as reported by the Client’s custodians, third-party fund managers, and other independent pricing services. Depending on each specific custodian, Fees are calculated based on either the portfolio value on the last day of the previous billing period or based upon the average daily market value of the portfolio during the billing period The specific methodology is disclosed in the client agreement and discussed as part of the client onboarding process.

Clients agree to the terms of their fee calculation methodology in the Client Advisory Agreement with LXG.

Separate reporting or concierge service fees may be charged, and such fees are determined on a case-by-case basis and are included and prominently disclosed in the Client's Advisory Agreement.

Clients may also incur certain expenses, such as brokerage commissions and markups, margin interest (if applicable), currency exchange costs, transfer of asset costs and other transactions costs, imposed by the transacting broker-dealers ("Brokers"), custodians, third-party investments, and other third-parties. These other expenses are not included in the Advisory Fee and are borne separately by the Client to the extent incurred (please refer to the Brokerage Practices section for additional information). LXG may recommend investing a portion of a client's assets in shares of mutual funds or other investment companies, including exchange traded funds, as well as private funds. Assets invested in these funds bear other additional fees and expenses, which may include but are not limited to, expenses of organizing the funds, administration, accounting and tax, audit, legal, and filings and regulatory compliance. When investing in these types of securities, LXG will recommend that clients invest in the most costs effective share class. Clients invested in these funds should refer to the applicable fund's offering documents or prospectus for complete information on other fees and expenses.

In addition to fees, Clients may be responsible for certain out-of-pocket expenses for reasonable and direct costs incurred by LXG on the Client's behalf, as directed by the Client. These out-of-pocket expenses include payments made on behalf of a Client for Client expenses such as postage costs, utility bills, or other miscellaneous third-party expenses. All out-of-pocket expenses are pre-approved by the Client, in writing, before LXG pays them. LXG provides an invoice for such services, which is due upon receipt.

Clients should note that similar advisory services can or cannot be available from other registered investment advisors for similar or lower fees. The size of an account and the nature of the advisory services provided factor into the fees charged.

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

LXG does not charge performance-based fees to Clients.

#### **Item 7 – Types of Clients**

LXG generally provides investment advisory services to Clients who are high net worth individuals, families, trusts, corporations, or other qualified entities that have a minimum of \$5 million of investable assets. On certain instances, LXG may provide its services to potential clients with less than \$5 million of investable assets. Factors to consider when making this determination is the type of services requested, the type of investment strategy sought, relationship the potential client may have with LXG and its affiliates.

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

LXG gathers and analyzes Client information, such as investment objectives, investment experience, financial circumstances, and risk tolerances. LXG's investment philosophy is built around the concept of helping Clients achieve their investment objectives and goals in a manner that emphasizes liquidity, risk measurement and management, and investment cost efficiency. This process begins with the formulation of a broad asset allocation, first determined through a top-down process to establish long-term target allocations by asset class and is followed by a bottoms-up analysis of individual, investable instruments.

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

Based on a Client's risk assessment, investment objectives, life events and preferences, assets are allocated across traditional asset classes, asset types, and individual investments. In selecting individual investments, LXG's methods of analysis include:

*Qualitative Analysis.* This analysis is of particular relevance when evaluating third-party fund managers and fund management companies, and may include analysis of regulatory records, public records, background research, third-party fund manager team profiles, hiring processes, reference checks, audit results, and other analyses.

*Statistical Analysis.* This involves the analysis of past market data, primarily price, volume, and volatility data, as well as statistical analysis based on that raw data. This statistical analysis may include, but is not limited to, correlations, beta, alpha, stress testing, peer benchmarking, and other analytical tools.

*Cyclical Analysis.* This involves the analysis of business cycles to seek favorable conditions for buying and/or selling a security, sector, geography, or asset class. Investing in securities involves a substantial degree of risk of loss that Clients should be prepared to bear. All investments carry risk of loss and there is no guarantee that any investment strategy will meet its objective.

## B. Investment Strategies

LXG emphasizes the need for disciplined, long-term investment strategies (involving securities typically held at least a year) in order to achieve Clients' objectives. Nevertheless, LXG will selectively and occasionally use short-term investments (securities held less than a year) and trading (securities held for less than 30 days) for tactical reallocations in an effort to manage or moderate risk or to attempt to capture a specific investment opportunity. LXG can utilize one or more of these investment strategies in an effort to achieve the risk-adjusted returns as articulated in the Client's Investment Policy Statement.

## C. Risk of Loss Fixed-Income Securities.

LXG sometimes recommends investments in bonds or other fixed-income securities (or funds that hold these type of securities) to certain Clients, including, without limitation, sovereign debt, investment grade corporate debt securities, and "higher yielding" (and, therefore, higher risk) debt securities (or funds that hold these types of securities). Such securities may be below "investment grade" and may face ongoing uncertainties and exposure to adverse business, financial, or economic conditions that could lead to the issuer's inability to make timely interest and principal payments. The market values of some of these lower rated debt securities tend to reflect individual corporate developments to a greater extent than that of higher rated securities, which react primarily to fluctuations in the general level of interest rates and tend to be more sensitive to economic conditions than higher rated securities. Issuers that issue lower rated debt securities are often highly leveraged and may not have access to more traditional methods of financing. Trading in such securities may be limited or disrupted by an economic recession, resulting in an adverse impact on the value of such securities. In addition, it is likely that any such economic downturn could adversely affect the ability of the debt issuers to repay principal and pay interest thereon and, therefore, increase the incidence of default for such securities. In the event of a default, there is the risk of losing most or all of the assets invested in such defaulted security.

## D. ETFs.



LXG also recommends investments in ETFs to certain Clients. ETFs are hybrid investment companies that may be registered as open-end investment companies or unit investment trusts, but which possess some of the characteristics of closed-end funds. ETFs often hold a portfolio of common stocks, or bonds, that is intended to track the price and dividend (or interest) performance of a particular index. Certain ETFs are actively managed, and the performance of such entities will be dependent upon third-party managers. The market price for ETF shares may be higher or lower than the ETF's net asset value. With regard to sales not conducted in the market (which typically require the sale of a larger number of shares), the sale and redemption prices of ETF shares purchased from the issuer are based on the issuer's net asset value. The total return on ETF investments will be reduced by the operating expenses and fees of such investment companies, including advisory fees.

#### E. Other Risks.

Additional risks involving LXG' investment strategies include, but are not limited to:

*General Economic and Market Conditions.* General economic or market conditions may adversely affect the investments recommended to Clients. In addition, a downturn or contraction in the economy or in the capital markets, or in certain industries or geographic regions thereof, may restrict the opportunity to liquidate any such investments, each of which could prevent Clients from meeting their investment objectives.

*Illiquid Investments.* Certain investments may be illiquid with no assurance that Clients will be able to realize on any such investment in a timely manner. Illiquidity may result from the absence of an established market for the investments, as well as legal or contractual restrictions on the investment's resale.

*Private Funds.* LXG recommends investments in private funds to certain clients. Investments in private funds involve risks distinct from those of publicly traded securities. Specific risks are explained in more detail with clients for whom we recommend investing in private funds. Also, clients who invest in private funds will receive copies of the private funds' offering documents, which also discuss the risks of such investments.

*Foreign Investments.* LXG may invest in opportunities located in countries outside the US. Accordingly, the business and financial results of Clients could be adversely affected due to social or judicial instability, acts or threats of terrorism, changes in governmental policies or policies of central banks, expropriation, nationalization and/or confiscation of assets, price controls, fund transfer restrictions, capital controls, exchange rate controls, taxes, inadequate intellectual property protection, unfavorable political and diplomatic developments, changes in legislation or regulations and other additional international developments or restrictive actions.

*Cyber Security Breaches and Identity Theft.* Cybersecurity incidents and cyber-attacks have been occurring globally at a more frequent and severe level and will likely continue to increase in frequency in the future. The information and technology systems of LXG and their respective investments may be vulnerable to damage or interruption from computer viruses, network failures, computer and telecommunication failures, infiltration by unauthorized persons and security breaches, usage errors by their respective professionals, power outages and catastrophic events such as fires, tornadoes, floods, hurricanes and earthquakes. Although LXG has implemented disaster recovery and business continuity plans to manage

risks relating to these types of events, the failure of these systems and/or of disaster recovery plans for any reason could lead to an interruption in LXG' operations.

*Settlement Risks.* Execution may expose a client to the credit risk of parties with whom the Adviser, on behalf of the client and through the Broker-Dealer, trades and to the risk of settlement default. Clearing, settlement, and registration systems in emerging markets are less developed and may provide increased risks.

*ETF Risks including Net Asset Valuation and Tracking Error.* 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 advisory compensation – advisory fees charged by the Adviser plus any management fees charged by the sponsor of the ETF. 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 comparison. Expenses of the fund may include investment 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 sponsor. ETF tracking error and expenses may vary.

#### **Item 9 – Disciplinary Information**

LXG and its employees have not been involved in any legal or disciplinary events that would be material to an evaluation of LXG' advisory business or the integrity of the Firm's management.

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

As stated previously, LXG is part of the LXG Group based in Lima, Peru. Its affiliates in Peru provide companies and high net worth individuals with investment banking services, wealth management and financial planning services. LXG Group provides its clients with advisory services for a wide range of corporate finance situations, such as:

- Acquisition
- Mergers
- Disposals
- Capital and fund raisings
- Capital Restructuring
- Valuation Fairness opinions
- Raising of private equity funds
- Assisting issuers in international bond and equity offerings

LXG Group's clients are organizations with business interests in Latin America and include corporations, financial institutions, private equity funds and private families.

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

LXG has adopted a Code of Ethics (the "Code") that imposes on each employee a duty to place the interests of Clients first. The Code requires officers, owners, and employees to, among other things, report to the Chief Compliance Officer ("CCO") any actual or potential conflict of interest relating to any Firm Client. The Code also imposes restrictions and safeguards on the reporting and use of material, non-public information.

##### **Prevention of Insider Trading**

LXG has adopted policies designed to prevent insider trading that are more fully described in the Code. Adviser's policy on insider trading applies to securities trading and information handling by all Supervised Persons (including spouses, minor children and adult members of their households and any other relative of a Supervised Person on whose behalf Supervised Person is acting) for their own account or the account of any client of the Adviser.

Adviser takes its obligation to detect and prevent insider trading with the utmost seriousness. Adviser may impose penalties for breaches of the policies and procedures contained in the Code, even in the absence of any indication of insider trading. Depending on the nature of the breach, penalties may include a letter of censure, profit "give ups," fines, referrals to regulatory and self-regulatory bodies and dismissal.

##### **Personal Securities Transactions**

##### **Periodic Reports**

As more fully described in the Code, "access persons" are required to submit reports detailing their personal securities holdings to the Chief Compliance Officer on an initial basis, and thereafter on a quarterly and annual bases.

As an alternative to submitting quarterly transaction reports, Adviser requires persons who are "access persons" to submit brokerage statements or trade confirmations as long as such documents contain the information required under Rule 204A-1(b)(2)(i)(A)-(E) under the Advisers Act.

##### **Initial Public Offerings and Limited Public Offerings**

Access Persons must obtain prior written approval from the Chief Compliance Officer before investing in initial public offerings ("IPOs") or limited offerings (i.e., private placements).

##### **Review of Personal Securities Reports**

The Chief Compliance Officer (or designee) is responsible for reviewing the Access Person's Quarterly Transaction Reports as well as the Initial Holdings Report and the Annual Holdings Report as part of LXG's duty to maintain and enforce its Code.

##### **Outside Business Activities and Private Investments of Employees**

Unless otherwise consented by the Chief Compliance Officer, all employees are required to devote their full time and efforts to the LXG's business. As such, no person may make use of either his or her position as an employee or information acquired during employment or make personal investments in a manner that may create a conflict, or the appearance of a conflict, between the employee's personal interests and LXG's interests. Accordingly, every employee is required to complete a disclosure form and have the form approved by the Chief Compliance Officer prior to serving in any of the capacities or making any of the investments more fully described in the Code.

#### Reporting Violations

All Supervised Persons (any officer, director, partner, and employee of Adviser) are required to report actual or known violations or suspected violations of the Code promptly to the Chief Compliance Officer or his designee.

Any report of a violation or suspected violation of the Code will be treated as confidential to the extent permitted by law. As part of Adviser's obligations to conduct an annual review of all of its policies and procedures pursuant to Rule 206(4)-7 of the Advisers Act, the Chief Compliance Officer shall review on an annual basis the adequacy of the Code and the effectiveness of its implementation.

#### Acknowledgement of the Code

Each employee will execute a written statement certifying that the employee has (i) received a copy of Adviser's Code; (ii) read and understands the importance of strict adherence to such policies and procedures; and (iii) agreed to comply with the Code.

#### Investments in Securities by the Adviser and its Personnel

LXG's personnel or a related person of the LXG may invest in the same or similar securities and investments as those recommended to or entered into on behalf of LXG's clients. The results of the investment activities of the LXG's personnel or its related persons for their accounts may differ from the results achieved by or for client accounts managed by LXG. The conflicts raised by these circumstances are discussed below.

LXG may recommend or effect the purchase or sale of securities in which its related persons or an affiliate, directly or indirectly, has a position or interest, or of which a related or affiliated person buys or sells for itself. Such transactions may also include trading in securities in a manner inconsistent with the advice given to the LXG's clients.

Activities and transactions for client accounts may be impaired or effected at prices or terms that may be less favorable than would otherwise have been the case had LXG or related persons did not pursue a particular course of action with respect to the issuer of the securities

Transactions undertaken by LXG's clients may also adversely impact one or more client accounts. Other clients of the Adviser may have, as a result of receiving reports or otherwise, access to information regarding LXG's transactions or views that may affect their transactions outside of accounts controlled by LXG, and such transactions may negatively impact other clients' accounts. A client's account may also be adversely affected by cash flows and market movements arising from purchase and sale transactions by, as well as increases of capital in and withdrawals of capital from, other clients' accounts. These effects can be more pronounced in less liquid markets.

The results of the investment activities of a client's account may differ significantly from the results achieved by the LXG's related persons and from the results achieved by the LXG for other client accounts.

As more fully described above, LXG has adopted a Code of Ethics. Such Code of Ethics together with LXG's policies and procedures restrict the ability of certain officers and employees of the LXG from engaging in securities transactions in any securities that its clients have purchased, sold, or considered for purchase or sale, for an appropriate "black out" period. Other restrictions and reporting requirements are included in the LXG's procedures and Code of Ethics to minimize or eliminate conflicts of interest.

#### Trading Alongside by LXG and its Personnel

Client accounts managed by LXG may trade in the same or similar securities at or about the same time as accounts managed or advised by affiliates of the LXG. Investments by LXG's affiliates and their clients may have the effect of diluting or otherwise disadvantaging the values, prices, or investment strategies of a client's account, particularly in small capitalization, emerging market, or less liquid strategies. This may occur when portfolio decisions regarding a client's account are based on research or other information that is also used to support portfolio decisions for LXG's affiliates. If a portfolio decision or strategy for LXG's affiliates' accounts or the accounts of clients of affiliates is implemented ahead of, or contemporaneously with, similar portfolio decisions or strategies for the LXG's client's account, market impact, liquidity constraints, or other factors could result in the account receiving less favorable trading results and the costs of implementing such portfolio decisions or strategies could be increased.

#### Errors

Errors may occur from time to time in transactions for client accounts. The LXG will typically correct any such errors that are the fault of the LXG or an affiliate at no cost to the client, other than costs that the LXG deems immaterial. To the extent that the subsequent sale of such securities generates a profit to the LXG, the LXG may retain such profits, and may, but is not required to, use such profits to offset errors in the future or pay other client-related expenses. The LXG will not be responsible for any errors that occur that are not the fault of the LXG or any affiliate.

#### Privacy Policy

LXG considers your privacy our utmost concern. LXG does not share information of clients with non-affiliated third parties, except such information may be disclosed to process a transaction an investor has requested, to the extent the investor specifically authorized the disclosure, to service providers or joint marketers who agree to limit their use of such information, and to the extent required or specifically permitted by law or reasonably necessary to prevent fraud, unauthorized transactions, or liability.

The Code requires all officers, owners, and employees of the Firm to report monthly and annually their own and immediate family members' security holdings and transactions to the CCO.

Clients or prospective Clients may request a copy of LXGs' Code of Ethics by contacting the Firm at +1 (305) 361 3631 or at [compliance@lxgwa.com](mailto:compliance@lxgwa.com)

## **Item 12 – Brokerage Practices**

For non-discretionary investment advice, the Client generally selects its own Broker for the implementation of the Firm's recommendations. However, the Client may ask the Firm to evaluate the quality of the Client's relationship with its current Broker(s) and/or recommend a different Broker. In making such a recommendation, the Firm will evaluate the Client's needs, as disclosed to the Firm, and will focus primarily on the financial strength, execution costs, and responsiveness of the Broker. However, such Clients are advised that they must independently evaluate these Brokers before opening an account or transacting business, and that they are not under any obligation to effect business through any recommended firm.

When LXG provides non-discretionary advisory services to certain Clients pursuant to which LXG makes recommendations on purchasing, selling, holding, valuing, or exercising rights with respect to particular investments, it does not have discretion to effect purchases or sales on behalf of such Clients without their prior approval. It is highly likely that discretionary and non-discretionary Clients hold the same or similar securities. There may be timing differences related to the transmission of advice to a non-discretionary Client for consideration and the Client's decision of whether or not to act on the advice. As a result, it is possible that trades or recommendations will be effected on behalf of discretionary Clients in advance of accounts for non-discretionary Clients. This could result in discretionary and non-discretionary Clients receiving more or less favorable execution prices on the same security and may result in potential differences in performance for the same security.

There may be instances, where a client in a non discretionary relationship has granted LXG authority to transmit orders to the custodian on its behalf. In cases where LXG is authorized to order transactions on behalf of Clients, the Firm will seek to obtain "best execution," the best available combination of execution, price (which includes the cost of the transaction), and other factors, among each Client's list of approved Brokers. In seeking best execution, the Firm takes into account all factors it deems relevant including, but not limited to, the financial stability and reputation of the particular Broker, the ability to achieve prompt and reliable executions at favorable prices, and the operational efficiency with which transactions are effected. In instances where the client has a single custodian, LXG will enter the transactions with that custodian and will monitor the competitiveness of transaction execution.

On occasion, Clients require that their financial assets remain in the custody of various financial institutions that are not able to implement LXG's recommendations. In such instances, LXG will select from the investment options available at such institutions in order to implement the Client's investment strategy. In these circumstances, direction by a Client to use a particular financial institution may result in higher costs, less favorable investments, and (materially) different performance than if LXG could freely recommend investments not limited to a particular financial institution or platform.

LXG executes all Client trades through each Client's custodial Broker(s) or other Brokers approved by Clients. LXG does not effect transactions with Brokers that have not been approved in advance by the Client. The Firm will attempt to negotiate lower commission schedules for Clients where possible. However, the most favorable execution may not be obtainable at all custodial Brokers, which may cost Clients more money.

The Firm's business model, which includes non-discretionary and directed brokerage accounts, does not support aggregating orders among Client accounts. This may or may not result in some Clients paying

higher brokerage commissions because of the Firm's inability to reduce transaction costs through order aggregation. In addition, directed brokerage may result in Clients receiving less favorable prices. However, in the event of the purchase of a new issue, the sale of a particular security, or other investment related reasons, LXG may aggregate orders in an attempt to receive a better execution price for its clients.

Notwithstanding, LXG seeks to allocate orders fairly between Clients and has established trade order procedures for both discretionary and non-discretionary accounts. For discretionary accounts, LXG typically executes its recommendations in a random order immediately and normally within the same day, after the same trade has been submitted for pre-approval to all non-discretionary Clients the Firm has deemed to be suitable. Trade approvals from non-discretionary Clients are queued and executed in the order in which they are received. The use of different executing Brokers will likely result in some Clients paying different Broker-imposed trade fees compared to other Clients. In addition, the timing in which transactions are affected by various Brokers may result in different execution prices on transactions.

The Firm does not have any soft dollar relationships.

With respect to discretionary Clients, the Firm is responsible for selecting the Brokers used for a securities transaction from a client's approved Brokers list. In negotiating commission rates and selecting Brokers, the Firm seeks to obtain best execution, as described above. It is noted that since commission rates are generally negotiable, selecting Brokers on the basis of considerations which are not limited to applicable commission rates may, at times, result in higher transaction costs than would otherwise be obtainable.

#### **Item 13 – Review of Accounts**

LXG's portfolio managers monitor Clients' portfolios on an ongoing basis. At least one primary portfolio manager is assigned to each Client. LXG uses tools to monitor, record, analyze, and report estimated and unaudited Client account performance on a daily basis.

Pricing data used for calculating performance, is provided the Client's custodians, third-party fund managers, and other independent pricing services.

At least quarterly, portfolio managers evaluate the performance of Client portfolios on an absolute, relative, and for compliance with the Client's Investment Policy Statement. At least annually, the portfolio managers will review each Client's Investment Policy Statement to confirm that it remains consistent with the Client's stated goals and objectives.

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

LXG does not receive any economic benefit from someone who is not a client for providing investment advice or other advisory services to its clients.

LXG may compensate person(s) for Client referrals. In such cases, LXG will provide full disclosure to the client on the referral agent and fee paid to such referral agent, this, in addition to providing other regulatory disclosures.

#### **Item 15 – Custody**

LXG does not have custody of any Client funds or securities, is not a qualified custodian, and does not provide custodial services to its clients. Clients select the Broker(s) or other qualified custodian to provide such services. In some instances, LXG may recommend a particular custodian to its clients, but the Firm

does not receive any compensation, other services, or benefits from the custodians or their affiliates for doing so. Clients receive statements directly from the Broker(s) or other qualified custodian that holds and maintains the Clients' funds and securities. LXG urges Clients to carefully review such statements and compare such official custodial records to the reports provided by the Firm.

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

LXG generally receives discretionary (or non-discretionary) investment authority from its clients at the outset of the advisory relationship. Depending on the terms of the applicable Advisory Agreement, LXG' authority may include the ability to execute trades or recommendations and select Brokers from a Client's approved Broker list through which to execute transactions, on behalf of Clients. In making decisions as to which securities are to be bought or sold and the amounts thereof, the Firm will be guided by any reasonable Client-imposed guidelines or restrictions set forth in the Client's Investment Policy Statement. Unless LXG and the Client have entered into a non-discretionary arrangement, the Firm is generally not required to provide notice to consult with or seek the consent of its clients prior to engaging in transactions. LXG' discretion is limited to purchasing and selling securities and LXG is not authorized to transfer any funds or securities out of any Client account.

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

LXG does not have voting authority with respect to Client securities. Clients should receive all proxy materials from their account Broker or other qualified custodian. Clients are responsible for receipt and voting of proxies for all securities maintained in their portfolios. Upon a Client's request, the Firm may provide information and advice to such Client regarding a particular vote by proxy, but Clients retain the responsibility for the determination and the actual act of voting.

From time to time, LXG may receive notices regarding class action lawsuits involving securities that are or were held by Clients. As a matter of policy, LXG can assist Clients in gathering documentation, but refrains from serving as the lead plaintiff in class action matters and from submitting proofs of claim unless LXG has accepted the authority to do so through the Client's Investment Advisory Agreement.

#### **Item 18 – Financial Information**

LXG is not aware of any financial condition that is reasonably likely to impair its ability to meet its contractual commitments to Clients and has never been subject to a bankruptcy petition.

#### **Item 19 – Requirements for State-Registered Advisors**

This section does not apply to LXG.





Brochure Supplement (Part 2B of Form ADV)

1441 Brickell Av. Suite 1016, Miami, FL 33131

(305) 456-7645

As of: December 31, 2023

Supervised Persons:

Félix Segura

All Supervised Persons can be reached at the address and telephone number listed above. This Brochure Supplement provides information about the above listed Supervised Persons that supplements the LXG Wealth Advisory Brochure. You should have received a copy of that Brochure. Please contact LXG at (305) 361-3631 or [compliance@lxg.com](mailto:compliance@lxg.com) if you did not receive LXG's Investment's Brochure or if you have any questions about the contents of this supplement.

The information in this supplement has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority. Additional information about all Supervised Persons is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **SEGURA, FELIX**

### **Item 2 - Educational Background and Business Experience Education:**

#### **Born in 1970**

##### **Education:**

- Babson College; Bachelor of Business Administration and Management 1992,
- Harvard Business School; Masters in Business Administration 2002

##### **Business Experience:**

- LXG Multi Family Office  
Managing Partner  
Lima, Peru  
2015 – Present
- Credit Suisse Securities (USA), LLC  
Registered Representative  
2015-2010
- JP Morgan Securities, Inc.  
Registered Representative  
2008-2010

### **Item 3 - Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice.

No information is applicable to this Item.

### **Item 4 - Other Business Activities**

Mr. Segura does not have any outside business activity.

### **Item 5 - Additional Compensation**

None

### **Item 6 - Supervision**

Felix Segura is the Managing Member of LXG and is responsible for his own supervision. Supervisory contact information: 786 266 2656