



## LifeInvest Wealth Management, Ltd.

**CRD# 146966**

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**December 31, 2023**

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 <https://adviserinfo.sec.gov/>.

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### **ITEM 3 MATERIAL CHANGES**

Item 1, Cover Page has been updated with the effective date of this annual amendment, and the inclusion of two branch offices in New York and San Diego.

Item 2, Table of Contents has been updated with effective pages of this annual amendment.

Item 4, Advisory Business, has been updated to reflect the AUMs as of December 31, 2023.

Item 5, Advisory Fee compensation has been amended the client option to pay advisory fee on monthly basis.

Item 10, Other Financial Industry Activities, Business Activities and Affiliations has been updated to remove LifeInvest Opportunity Funds has been terminated.

Item 11, Code of Ethics, Participation or Interest in Client Transactions and Personal Trading has been updated with LifeInvest has no longer recommended LifeInvest Opportunity Funds.

We have revised this brochure and it has been amended to remove the word “may” in those cases where it could cause confusion or imply an action or service that it is not provided or conducted by LifeInvest at present.

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 4 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.

Depending on each client's personal circumstances and investment profile, LifeInvest Wealth Management recommends, on occasion, redistributing investment allocations to diversify a client's portfolio in an effort to reduce risk and increase performance. LifeInvest Wealth Management recommends specific stocks to increase sector weighting and/or dividend potential. LifeInvest Wealth Management recommends employing cash positions as a possible hedge against market movement which could adversely affect its clients. LifeInvest Wealth Management recommends 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. As a service to its clients, LifeInvest Wealth Management offers access to Interactive Brokers' cryptocurrency trading and custody platform, through Paxos Trust Company. LifeInvest does not provide any investment advice on digital assets and does not charge any fees for this service. Please refer to LifeInvests' Digital Assets Risk Disclosure, Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss.

LifeInvest Wealth Management also provides sub-advisory services to institutional investors.

LifeInvest Wealth Management manages approximately \$402 million in client assets as of December 31<sup>st</sup>, 2023.

## **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 the President, CEO and COO, Ernesto Rangel is Vice President and CFO, Monica Calabrese is a Secretary and Christian Ramirez is CCO.

## **ITEM 5 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.

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 can 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. 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 or in arrears on a quarterly or monthly basis pursuant to a financial advisory contract according to the following Fee Schedule:

<b>AUM</b>	<b>FEES</b>
\$20,000 TO \$250,000	2.00%
\$250,001 TO \$1,000,000	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 could be established and exist where the fees are higher or lower than the Fee Schedule provide above. The Fee Schedule above is negotiable on a case-by-case basis. The minimum Annual Fee for all clients is \$1,500.00.

Fees are billed at the beginning of each quarter. These fees could 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 could 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 6 PERFORMANCE-BASED FEES AND SIDE-BY-SIDE**

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

## **ITEM 7 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.

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

## **ITEM 8 METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS**

LifInvest Wealth Management Ltd primary approach is to use fundamental analysis. The advisor uses, 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.

LifInvest Wealth Management's investment strategies used to implement investment advice given to our clients include long term purchases. Sometimes, the advisor recommends employing cash positions as a possible hedge against market movement which could adversely affect the portfolio. The advisor recommends 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.

Most of the strategies employed by LifInvest to manage client's portfolios, that are deemed to have an appropriate profile and risk tolerance, will include investments in Structured Products. These Structured Products include the following risk of loss:

Purchasing structured products involve a number of risks and are not suitable for all investors. It is suggested that the investors purchase these securities only after careful consideration with their financial, accounting and tax advisors regarding the suitability of the specific Structured Product in light of their particular circumstances.

### **Market and Principal Risk**

Depending on the structure, the Structured Product may not pay interest prior to liquidation and may be structured to pay any payments due the investor only at maturity. The rate of return, if any, will depend on the performance of the "underlying" basket of stocks, the underlying individual stock, the underlying index, the underlying debt instrument, and/or the underlying commodity backing the Structured Product.

If the Structured Product is not designated as being 100% principal protected or FDIC insured, as with certificates of deposit, then some or all of your principal may be at risk. In this case, the return of principal is only guaranteed to the extent specified for the Structured Product and, is specifically subject to the underwriter's credit and the creditworthiness of the issuer. If the return on the "underlying security" is negative, the amount of cash paid to you at maturity will be less than the principal amount of the

investment and you could lose up to the percentage indicated of your initial investment. It is also possible that at maturity you may end up owning the underlying security at a price lower than the original purchase price. In addition, if the basket return is positive, payment will be limited because the percentage increase of the underlying basket calculated as of the determination date may be capped, on a per share basis, at the percentage disclosed for the appreciation of each stock held within the basket. It should also be noted that there may be little or no secondary market for the Structured Product and information regarding independent market pricing of the Structured Products may be limited.

It is also important to note that many factors will contribute to the availability of any potential secondary market *value* of the Structured Product, and you may not receive your full principal back if you sell or otherwise liquidate Structured Products prior to maturity. Such factors include, but are not limited to: time to maturity, the appreciation or depreciation, if any, of the underlying basket, volatility, and interest rate movement in the market place, and any other significant occurrences in the market place that may compromise the value of the underlying securities or index underlying the Structured Product.

***Below is more information regarding certain risks to be aware of when purchasing this product:***

- You should have received and reviewed the prospectus and current prospectus supplement related to each Structured Product. You should review the risks disclosed therein, and determine that the investment in the Structured Product is suitable and appropriate in light of your investment objective and risk tolerance.
- Your investment in the Structured Product will be subject to the credit risk of the issuer and the actual and perceived creditworthiness of the issuer may affect the market value; therefore, there is market risk in addition to credit risk.
- There may not be an available secondary market for the Structured Product.
- The yield on the Structured Product may be considerably less than that of a standard debt security of comparable maturity.

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.

**Digital Assets Risk Disclosure.**

This disclosure document is intended to inform you of some of the risks associated with investing in digital assets. Investors should be aware of these associated risks, which are described below:

**Technical risks**

Digital assets are based on complex and evolving technologies. There is a risk that



software or hardware failures, hacking or other technical problems may disrupt the operation of digital asset networks, resulting in losses for investors.

#### Legal risks

The legal and regulatory landscape for digital assets is still developing. There is a risk that new laws or regulations may be enacted that could have a negative impact on the value or utility of digital assets.

#### Market risks

Digital asset markets are highly volatile and illiquid. This means that the price of digital assets can fluctuate wildly, and it can be difficult to sell them quickly or at a fair price. In addition, there is the risk of market manipulation and fraud.

#### Price volatility

Digital asset prices are highly volatile and can fluctuate wildly in response to a variety of factors, such as news, social media sentiment and regulatory changes. This volatility can lead to significant losses for investors.

#### Operational risks

Digital assets are often stored in digital wallets or exchanges. There is a risk that these wallets or exchanges may be hacked, suffer technical problems resulting in the loss of investors' funds, be stolen, or be lost due to human error.

**Tax risks:** The tax treatment of digital assets is complex and evolving. Investors should consult with a tax advisor to understand the tax implications of investing in digital assets.

#### Fraud and scams:

There is a high risk of fraud and scams in the digital asset sector. Investors should be wary of any investment opportunity that seems too good to be true.

#### Valuation methodology

There is no universally accepted methodology for valuing digital assets. This can make it difficult to determine the fair market value of digital assets and lead investors to overpay for them.

## **ITEM 9 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 10 OTHER FINANCIAL INDUSTRY ACTIVITIES, BUSINESS ACTIVITIES AND AFFILIATIONS**

LifeInvest Wealth Management Ltd receives compensation for selling certain products from third parties. The payments potentially 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.

Structured Products that LifeInvest uses to diversify client portfolios are from third party providers or others that include the firm as a sponsor or manager of the Note or Fund. The firm will, in some cases, receive material compensation from these investment vehicles that are apart from what is paid by the client for advisory services. Affiliates of the firm and its related persons will co-invest in some or all of the Structured Products alongside the clients of the firm.

LifeInvest Wealth Management has a sub-advisory agreement with Kapital Consulting LTD, a BVI Business company, to provide investment consulting, management and sub-advisory services to certain clients / accounts of LifeInvest Wealth Management. Kapital Consulting LTD and LifeInvest Wealth Management have access and supervised persons in common.

From time to time, LifeInvest Wealth Management recommends to certain clients to invest in one or more private funds, where one or more of our affiliates acts as General Partner, Sponsor, Portfolio Manager, or Investment Advisor. Investments recommendations are made based on each client's investment and risk profile.

#### **ITEM 11 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).

From time to time, LifeInvest Wealth Management recommends to certain clients to invest in one or more private funds, where one or more of our affiliates acts as General Partner, Sponsor, Portfolio Manager, or Investment Advisor. Investments recommendations are made based on each client's investment and risk profile.

## **ITEM 12 BROKERAGE PRACTICES**

LifeInvest Wealth Management does not provide trade execution services for its advisory clients. Instead LifeInvest Wealth Management recommends, but does not

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require, that its clients execute their trades for their account(s) through a non-affiliated broker-dealer, Miura Capital LLC, or Portfolio Resources Group ("PRAG").

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.

**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, from time to time, combines 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 could 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 recommends 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. If requested by the client, LifeInvest Wealth Management Ltd recommends 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 custodians include, Pershing LLC, New Jersey (CRD#7560), Interactive Brokers (CRD#36418) and others.

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 13 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 (CEO and COO) will conduct a continuous review of clients holding but at least will conduct the quarterly review of client holdings. Mrs. 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 14 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 15 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 16 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 17 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 18 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.