

Bachrach Asset Management Inc.

Brochure Supplement for

Carlos Bachrach

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CRD# 6039567

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This brochure provides information about the qualifications and business practices of Carlos Bachrach and Bachrach Asset Management Inc. If you have any questions about the contents of this brochure, please contact us at (301) 365-8880 or write to carlosb@venturifunds.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.

Additional information about Bachrach Asset Management Inc. also is available on the SEC's website at www.adviserinfo.sec.gov.

Bachrach

Carlos Bachrach

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Carlos Bachrach is the co-founder of Bachrach Asset Management (1993), an entity dedicated to investment management. Mr. Bachrach has extensive experience in economic analysis, business and financial consulting to governments, investment funds and private enterprises as well as investment management.

Mr. Bachrach joined the Falk Institute for Economic Research (Jerusalem – Israel) in 1982 as a Research Assistant. From 1985 to 1987, he served as Research Assistant at the National Bureau of Economic Research in Cambridge, MA. From 1990 to 1993, Carlos worked as Manager and Senior Consultant at KPMG Peat Marwick – Policy Economics Group in Washington D.C. Over the years his duties ranged from doing macroeconomic analysis, investment analysis and project analysis in a wide range of industries.

Mr. Bachrach also co-founded Pro-Consulta, a consulting company dedicated to provide financial, economic and general investments consulting. Clients included the World Bank and the Inter-American Development Bank. Assignments focused on investment analysis and valuation of privately held investments and venture capital portfolios.

Mr. Bachrach co-founded Bachrach Brothers and Associates, an entity that managed investment portfolios for individuals and an offshore investment vehicle. Subsequently, Carlos co-founded Bachrach Asset Management Inc., to manage Pareto Latin American Partners, and investment vehicle specialized in Latin American securities. Bachrach Asset Management Inc. also served as the investment manager of the Tradewinds Fund, a long-short investment partnership that invested globally in publicly traded securities. Bachrach Asset Management Inc. currently serves as the investment manager of a group of affiliated offshore funds, Venturi Global Fund Ltd, SAC (formerly Venturi Global Fund SPC, Ltd).

Mr. Bachrach, as co-manager of Bachrach Asset Management, serves as investment adviser to the Venturi Global Opportunity Fund, the Venturi Global Equity Fund, the Venturi Global Fixed Income Fund, the Venturi Global Real Estate Fund and the Venturi Global Natural Resources Fund.

Carlos earned his B.A. and M.A. in Economics and Statistics (Cum Laude) from the Hebrew University of Jerusalem. Carlos obtained his Ph.D. in Economics from the Massachusetts Institute of Technology (MIT) in Cambridge, MA. Carlos has been an Instructor in Economic Principles for the Executive Masters Program at the Sloan School of Management at MIT.

DISCIPLINARY INFORMATION

On June 1, 2018, Bachrach Asset Management entered into a settlement with the Securities and Exchange Commission in connection with Bachrach Asset Management's alleged failure to file Form PF as required under Investment Advisers Act Rule 204 (b)-1. Without admitting or denying the findings, Bachrach Asset Management consented to the entry of the Order dated June 1, 2018 and paid a \$75,000 civil money penalty promptly thereafter. Bachrach Asset Management has filed all required reports of Form PF as of the date hereof.

Except for the above, neither Bachrach Asset Management Inc. nor Carlos Bachrach has been subject to any other disciplinary actions by the Securities Exchange Commission (SEC) or any other regulatory authority.

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You may access Carlos Bachrach's regulatory file by following this link to the SEC Investment Adviser Public Disclosure (IAPD) Database: <http://www.adviserinfo.sec.gov>

OTHER BUSINESS ACTIVITIES

Mr. Bachrach is a Board Member of Agrokasa Holdings S.A. and of Sociedad Agricola Drokasa S.A., a Peruvian company involved in agriculture. He also co-manages a food distribution company in the U.S.A., Pacific Produce LLC, based in Maryland.

Mr. Bachrach is also a Managing Director and shareholder of Bachrach Investments Partners LLC, a family investment vehicle incorporated in Maryland; a Member of La Loma Potomac LLC, investor in a hotel in Panama; General Manager of Inversiones Pukata SAC, owner and operator of a hotel in Cusco, Peru; Managing Member of Drake & Finch Global Travel LLC, a service provider in the tourism industry; and Member of Contemporaria LLC, an interior design studio.

SUPERVISION

Bachrach Asset Management Inc. has adopted a Code of Ethics that sets forth the basic policies of ethical conduct for all managers, officers, and employees of the adviser. In addition, the Code of Ethics governs personal trading by each employee of Bachrach Asset Management Inc. deemed to be an Access Person and is intended to ensure that securities transactions effected by Access Persons of Bachrach Asset Management Inc. are conducted in a manner that avoids any actual or potential conflict of interest between such persons and clients of the adviser or its affiliates. Bachrach Asset Management Inc. collects and maintains records of securities holdings and securities transactions effected by Access Persons. These records are reviewed to identify and resolve potential conflicts of interest. Bachrach Asset Management Inc. maintains a code of ethics and they will provide a copy to any client or prospective client upon request.

Bachrach Asset Management Inc. 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. Miguel Bachrach, as the Firm's Chief Compliance Officer, reviews all transactions executed by the Firm on a daily basis, and conducts an additional review of all securities transactions by officers and employees quarterly. Clients may contact Mr. Bachrach with any questions or concerns regarding their accounts or particular transactions, at (301) 365-8880 or email at miguelb@venturifunds.com.