

Finamex Asset Management, LLC

Client Brochure – Part 2B

This Brochure provides information about the qualifications and business practices of Finamex Asset Management, LLC. If you have any questions about the contents of this Brochure, please contact us at [001-5255-5209-2104]. 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.

Finamex Asset Management, LLC is a registered investment adviser. Registration of an investment adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

Additional information about Finamex Asset Management, LLC is also available on the SEC's Web site at www.adviserinfo.sec.gov.

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May 22, 2019

Jorge Martin Ramos Landero
President and Chief Compliance Officer
Finamex Asset Management, LLC

Andres Gracia Merino Villarreal
Investment Advisor Representative
Finamex Asset Management, LLC

Jorge Martin Ramos Landero “Jorge Ramos” – President & Chief Compliance Officer (CRD# 2269682); Series 4, 7, 24, 99; (79 and 66 registrations pending testing)

In 1987, Jorge Ramos earned a Bachelor of Arts Degree in Business Administration from the Universidad La Salle in Mexico City where he was awarded “*First Place as Best Graduate*” of the BA University course. Later he obtained a full scholarship and earned a Master of Arts Degree in International Business and International Financial Management from the University of Reading, Royal County of Berkshire, England.

Mr. Ramos started his financial services career in Mexico City beginning as a sales representative assistant for Casa de Bolsa Madero (1983-1985) where he was engaged in international equity arbitrage on the Mexican Stock Exchange (the Bolsa). He then associated himself with Casa de Bolsa Mexicana de Inversiones y Valores (1985) where he was engaged in domestic sales (i.e. Mexican sales). Mr. Ramos then became employed by Valores Finamex, S.A. de C.V. where he was Vice President of sales and equities and where he also oversaw the trading desk and he supervised as many as 10 other salesmen and traders. In approximately 1987 he engaged in institutional sales for international customers (i.e. non-Mexican) where the institutions bought and sold equities listed on the Mexican Bolsa. In 1990 Mr. Ramos worked for Multivalores Casa de Bolsa, S.A. de C.V. as the manager of Equity Trading and International Arbitrage. From 1991 - 1994 Mr. Ramos was employed by Afin Casa de Bolsa, S.A. de C.V. as a Vice President of International Trading. From 1993-1998 he was registered with Afin Casa de Bolsa’s subsidiary and U.S. broker/dealer, Afin Securities International, Ltd. (CRD# 30648) where he oversaw sales to institutional customers that resided in the US, Europe, and Asia. While with Afin Securities Mr. Ramos supervised the firm’s trading desk in New York and he oversaw Afin Casa de Bolsa’s international trading desk in Mexico City. Mr. Ramos supervised approximately 15 - 20 people at any one time while employed with the Afin entities. During this period, Mr. Ramos also oversaw the training of new registered representatives. From November 1994 - November 1996 Mr. Ramos was domiciled in New York City. In 1996 Mr. Ramos returned to Mexico City and became employed by Casa de Bolsa Banorte, SA de CV (who had acquired Afin Casa de Bolsa, S.A. de C.V.) and served as a Director of Equity Trading (1996-1998). During the period with Banorte Mr. Ramos retained his position with Afin Securities. In 1999 Mr. Ramos worked for CBI International Securities, Inc. (CRD# 30362) which engaged in the same activities as Afin Securities. While with CBI Mr. Ramos was the sole series 24 principal and he oversaw all supervision of the U.S. broker/dealer. From 2000-2003 Mr. Ramos was a registered representative for Invex, Inc. (CRD# 30032), a U.S. broker/dealer in Dallas, Texas. Mr. Ramos continued to live in Mexico City and solicited and serviced private banking clients on behalf of Invex. From 2003 – 2015 Mr. Ramos served as the President, CCO, and Options Principal of Monex Securities, Inc. (CRD# 30362). He oversaw 5-15 registered persons while at Monex Securities. During this period Mr. Ramos also served as Director of Equity Trading of Monex Casa de Bolsa (the parent company of Monex Securities) where he oversaw the firm’s equity trading activities. From 2008-2015 Mr. Ramos also served as the President and CCO of Monex Asset Management, Inc., the affiliated investment advisor of Monex Securities.

Mr. Ramos left the Monex entities in January 2015 and during 2015 – 2016 Mr. Ramos was the primary care-taker for his terminally ill younger brother who was domiciled in Mexico. Mr. Ramos was most recently registered in the U.S. with Intercam Securities, Inc. (CRD# 146667) from 12/2016 – 01/2017. From January 2017 – February 2019, Mr. Ramos was registered in Mexico with Intercam Casa de Bolsa (the Mexican affiliate of Intercam Securities). While with Intercam Casa de Bolsa Mr. Ramos was in domestic sales and serviced high net worth Mexican customers through the firm's private banking department. In March 2019, Mr. Ramos joined Casa de Bolsa Finamex S.A.B. de C.V. (a Mexican registered brokerage house) to oversee the authorization processes before U.S. regulators for Finamex International, LLC (a broker dealer) and Finamex Asset Management, LLC (a Registered Investment Adviser). Both companies are affiliates of Casa de Bolsa Finamex S.A.B. de C.V. Mr. Ramos currently has the Asesor en Estrategias de Inversion license (the Mexican regulatory equivalent of a series 7 license) and has continuously had this license or its predecessor license (Apoderado para Celebrar Operaciones con el Publico Inversionista) since 1985. In addition to the preceding activities, Mr. Ramos was registered with the NFA and oversaw the Futures and Commodities business for Banorte Securities International Ltd (1995 – 1999) and for Monex Securities Inc. (2007 – 2015). During Jorge Ramos' career he has held 14 different financial related licenses with various Mexican or United States regulatory bodies. Mr. Ramos also has had the ACAMS anti-money laundering certification.

Mr. Ramos' record with FINRA reflects a single disciplinary disclosure which was initiated in 2014, while he was with Monex Securities, and it stemmed from a 2011 examination. Mr. Ramos entered into an offer of settlement with FINRA which resulted in him being fined \$15,000 and he was suspended for 45 days from acting in a principal capacity, only. Mr. Ramos served his suspension from 1/20/15 through 03/5/2015 without incident, and his fine was paid in full. The action (FINRA Case # 2011025617702) was not related to sales practices or character related matters by himself or by anyone under his supervision; rather the disciplinary action concerned Monex Securities' payments of transaction-related compensation to persons associated with Monex Securities' parent company (which is a registered Mexican broker/dealer). The recipients of the compensation were not registered with FINRA and it was found that they were not eligible for the foreign finder exemption as their involvement with Monex Securities' customers went beyond an initial introduction. FINRA cited Monex Securities for failing to maintain an adequate supervisory system. Since Mr. Ramos was the President and CCO, he was ultimately held responsible for supervision and the activities of Monex Securities, thus he was named as a respondent.

Mr. Ramos is also the President, Chief Executive Officer, Chief Compliance Officer and Registered Options Principal for Finamex International, LLC (a U.S. registered broker dealer that is an affiliate of Finamex Asset Management, LLC). For his involvement with the broker dealer, Mr. Ramos receives compensation in the form of salary and a bonus depending on the firm's results. Mr. Ramos has no other source of income.

As part of his duties and responsibilities, Mr. Ramos reports directly to the Board of Directors of Finamex Asset Management, LLC, whose Chairman is Mr. Eduardo Arturo Carrillo Madero with primary offices in Mexico City (telephone number + (5255) 5209 2000).

Andres Gracia Medrano Villarreal “Andres Gracia Medrano” – Investment Adviser Representative (CRD# xxxxxx); Series 7, 24, 99, 66 (registrations pending)

Mr. Gracia Medrano formal education was obtained at the Instituto Tecnológico Autónomo de México (ITAM) in Mexico City. He received a B.Sc. in Economics, with a concentration in Finance.

Mr. Gracia Medrano has been in the financial services industry for over eight years. He has held the Fixed Income and Derivatives Trading Operations license with the CNBV (the Mexican Banking and Securities Authority) since Oct 2012. Mr. Gracia Medrano began his financial services career with Banco Santander (2010-2011) where he was responsible for the profitability analysis of the fixed income desk and oversaw the management control of the derivatives front desk. He then moved to Casa de Bolsa Finamex S.A.B. de C.V. (“Finamex Casa De Bolsa”) where he has held several positions. As a Fixed Income Trader (2011-2014) he developed macroeconomic analysis and trading strategies for the proprietary trading desk, and was responsible for all of the firm’s futures trading operations. From 2014-2016 he was a Portfolio Manager and Asset Manager where he directed the investment strategy and portfolio management of the firm’s two main client funds. From 2016 through the present he has been the Proprietary Trading Director and has been in charge of managing the investment strategy and operations for Finamex Casa de Bolsa’s proprietary accounts.

Mr. Gracia Medrano has been a supervisor at a broker/dealer for over four years. The products and activities have included fixed income, futures, derivatives, FX operations and clearing. He has overseen at least 5 people that deal with retail, high net worth individuals, and institutional customers with assets of approximately US\$2 billion.

Mr. Gracia Medrano has no disciplinary actions.

Mr. Gracia Medrano is also a Principal and a General Securities Representative for Finamex International, LLC (a U.S. registered broker dealer that is an affiliate of Finamex Asset Management, LLC). For his involvement with the broker dealer, Mr. Gracia Medrano receives compensation in the form of salary and a bonus depending on the firm’s results. Mr. Gracia Medrano has no other source of income.

Mr. Gracia Medrano is supervised by Jorge Martin Ramos Landero, President and Chief Compliance Officer of Finamex Asset Management, LLC. Telephone number + (5255) 5209 2104).