

ACCI CAPITAL INVESTMENTS LLC

INVESTMENT ADVISER

CRD# 304484

**2000 Ponce de Leon Boulevard
Suite 514A
Coral Gables, FL 33134**

**Serrano 93, 7th Floor
Madrid, Spain**

October 2019

This brochure provides information about the qualifications and business practices of ACCI Capital Investments LLC. If you have any questions about the contents of this brochure, please contact us at (305) 448-0014 or write to info@accipartners.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 ACCI Capital Investments LLC is also available on the SEC's website at www.adviserinfo.sec.gov.

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ITEM II MATERIAL CHANGES

Item I has been amended to reflect the new effective date of this brochure and the address of our office in Madrid, Spain.

Item III, Advisory Business, has been amended to reflect a change in the Officers list of the company as well as a change in the ownership structure of the company. As of October 2019, the company will be owned directly by its officers and directors.

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 (305) 448-0014 and / or by email at info@accipartners.com

Additional information about ACCI Capital Investments LLC is also available via the SEC's web site www.adviserinfo.sec.gov. The SEC's web site also provides information about any persons affiliated with ACCI Capital Investments LLC who are registered, or are required to be registered, as Investment Adviser Representatives ("IARs") of ACCI Capital Investments LLC

ITEM III ADVISORY BUSINESS

Founded in 2019, ACCI Capital Investments LLC (ACCI Capital) is an independent boutique investment advisory firm founded in 2019. ACCI Capital's main objective is to provide personalized, unbiased and transparent financial advisory services to their clients (both individuals and institutions).

Adviser provides investment advisory services to Adviser's clients through the management of investment portfolios in accordance with the objectives, guidelines and risk profiles of individual clients. Clients provide such information to Adviser at or before the time they enter into an advisory agreement with Adviser.

Its principal business is to provide fee-based investment advisory services. The advisor practices custom management of portfolios, on a discretionary and non-discretionary basis, according to the client's objectives. The advisor's primary approach is to use a tactical allocation strategy aimed at reducing risk and increasing performance. The advisor uses exchange listed securities, over-the-counter securities, foreign securities, corporate debt securities, CDs, variable life insurance, 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 mutual funds by using various criteria, such as the fund manager's tenure, and/or overall

career performance. The advisor may recommend, on occasion, redistributing investment allocations to diversify the portfolio in an effort to reduce risk and increase performance. The advisor may recommend specific stocks to increase sector weighting and /or dividend potential. The advisor may recommend employing cash positions as a possible hedge against market movement which may adversely affect the portfolio. The advisor may recommend 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. ACCI Capital will provide investment advisory services and portfolio management services and will not provide securities custodial or other administrative services. At no time will ACCI Capital accept or maintain custody of a client's funds or securities.

ACCI Capital may periodically recommend and refer clients to unaffiliated money managers or investment advisors. Through this arrangement, the Client will then enter into an advisory agreement with the third-party money manager authorizing them to assist and advise the client in establishing investment objectives and develop an investment strategy to meet those objectives by identifying appropriate investments and monitoring such investments. In consideration for such, the third-party money manager will receive an investment advisory fee, billed quarterly in advance and based on the account asset value at the time the account is established. ACCI Capital will receive a portion of the investment advisory fee for the solicitation and referral of the client to the third party manager, and may assist the client in completing their client questionnaire and account opening paperwork. ACCI Capital may also assist in the development of the initial policy recommendations and managing the ongoing client relationship. The Client, prior to entering into an agreement with a third-party money manager selected by ACCI Capital, will be provided with that manager's Form ADV Part II and Schedule F (or a brochure that makes the appropriate disclosures). In addition, ACCI Capital and its Client will agree in writing that the Client's account will be managed by that selected third party money manager on a discretionary basis.

Portfolio Supervision & Consulting Services

As an investment adviser, ACCI provides portfolio management and administrative services to client accounts (the "Accounts"), including investigating, analyzing, structuring and negotiating potential investments, monitoring the performance of investments and advising the Accounts as to the disposition of investment opportunities.

Family Wealth Services -Investment Advisory Consulting

ACCI provides a variety of non-discretionary consulting services with respect to client assets. Adviser will assist clients in defining personal financial goals and objectives and supply analysis and guidance as to the actions and investment strategies necessary to attain the selected goals and objectives. While such investment advisory consulting services do not include discretionary authority with respect to investing the client's assets, they typically include (i) the ongoing responsibility to select and/or make investment recommendations, based on the needs of the client, as to specific securities or investments the client may purchase or sell, and (ii) if such recommendations are accepted by the client, responsibility for arranging or effecting the purchase or sale, together with authorization to select the brokers for execution of securities transactions and place orders for the execution of such transactions, unless otherwise indicated in writing. All guidance and investment advice is based upon the information provided by the client. Generally, the Adviser offers the client the following services:

General: Investment Policy Statement & Definition; Asset Allocation Strategy; Investment Strategy & Manager Review.

Investments: Review of Current Portfolios & Proposals; Determine Modifications, Create Timeline and Implement; Suggest Reasonable Fees for Products and Services; Provide Consolidated Reporting and Analysis; Ongoing Monitoring and Re-evaluation; Define or Affirm Wealth Transfer Desires; Succession Illustration and Definition.

Risk Management: Review Risk Reduction Strategies

ACCI Capital, has 12 clients and approximately \$35,000,000 in Assets Under Management, as of September 30, 2019. ACCI Capital is a limited liability company registered in Florida. The principal direct shareholders of the company are:

OFFICERS

Jesus Gil Garcia	Director & CCO
Manuel Gil Garcia	Director, Portfolio Manager & Principal
Antonio de la Oliva	Director
Francisco Javier Guerra	Director

ITEM IV FEES AND COMPENSATION

Asset Management Fees

Pursuant to an investment advisory contract signed by each client, the client pays a quarterly Advisory Fee, generally payable in advance¹, based on the net asset value of the assets managed by the advisor as of the end of business on the last business day of the prior quarter. Pro-rated refunds fees will be made to the clients if and when the Agreement is terminated during a quarter for which payment has been received by the Manager. The first payment is pro-rated based on the number of days that the Agreement is effective for the first calendar quarter.

Fee Schedule

Annual Fee: From 0.15% to 2% per year of AUMs
Minimum Annual Fee: \$300.00 per year

Fees are billed at the beginning of each quarter or at the end of the quarter depending of the agreement with each client.

These fees may be negotiated by the advisor under unusual circumstances, at the sole discretion of the advisor. Asset management fees will be automatically deducted from the client account on a quarterly basis by the custodian, except for those accounts with a Performance Fee Agreement².

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 may 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.

Consulting Fees

The Firm may also provide certain specified services for a fixed, non-asset-based fee, which will be negotiated with the clients and depends on a variety of factors. All fees will be governed by the Agreements. The fees that our clients will pay us are provided for in the investment management agreements ("Agreements") that the clients execute with us. All such fees, including asset-based fees and such fixed, non-asset-based fees, typically are paid quarterly in arrears. The client shall instruct the custodian of its accounts to debit the accounts to pay the advisory fees each quarter. Clients may negotiate the fees they agree to pay.

The current rate for Hourly Fees is \$350.00 / Hr.

Performance Fees

Qualified clients, as defined by Rule 205-3 of the Investment Adviser's Act, may enter into advisory agreements where the Firm is entitled to a performance fee as part or all of its compensation. Qualified investors must meet the following requirements: (a) have at least \$500,000 in under management with the adviser; or (b) have a net worth of at least \$1,000,000 in order to enter into performance-based compensation agreements with ACCI Capital Investments LLC. Pursuant to the rule, in calculating a natural person's net worth: (a) the person's primary residence will not be included as an asset; (b) indebtedness that is secured by the person's primary residence (e.g., a mortgage), up to the estimated fair market value of the primary residence at the time the advisory contract is entered into, will not be subtracted as a liability; and (c) indebtedness that is secured by the person's primary residence in excess of the estimated fair market value of the primary residence at the time the advisory contract is entered into will be subtracted as a liability. Suitability will be determined through the use of a detailed suitability questionnaire and follow up due diligence inquiries. The Firm at its sole discretion, may reject any client application where the above financial standards are not met and/or where it reasonably believes the investor lacks the necessary financial sophistication, who purport to not fully understand the Firm's method of compensation and the nature of its risks, or who are otherwise deemed to be unsuitable for such an arrangement.

Additional Fee Information

Clients may authorize the Adviser to directly debit management fees from client accounts on a quarterly basis. In such instances, management fees are prorated for each contribution and withdrawal made during the applicable

calendar quarter. Accounts initiated or terminated during a calendar quarter will be charged a prorated fee.

Alternatively, in some instances, clients may receive an invoice for fees, in which it may choose to pay ACCI directly for its billed fees for the relevant period.

Adviser's fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred directly by the client. Clients may incur certain charges imposed by custodians, brokers, and other third parties such as fees charged by fund managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic funds fees, and other fees and taxes on brokerage account and securities transactions. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. It is the Adviser's policy not to accept "kick-backs" or retrocession fees from any third non-affiliated party providing services to the Adviser's clients; however, Adviser's related persons, including dually registered employees, may receive a portion of these commissions, fees and costs.

¹ Qualified Investors with a Performance Fee Agreement pay quarterly management fees and performance fees in Arrears.

² Clients with a Performance Fee Agreement are invoiced in arrears and may or may not authorize their custodian to automatically deduct performance / management fees from the account(s).

ITEM V PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

In addition to the Management Fee, the Firm may receive a Performance Fee based upon any gains obtained in the client's account for the quarter. This fee will be a percentage of any gains in the client account during that period, to be determined with each specific client but never to surpass 20% of the performance per quarter.

Accounts with a Portfolio Management Agreement that includes Performance Fees are charged Advisory Fees in Arrears on a quarterly basis.

Clients that are paying a performance-based fee should be aware that investment advisors have an incentive to invest in riskier investments when paid a performance based fee due to the higher risk/higher reward attributes.

Advice may be provided on assets held offshore.

ITEM VI TYPES OF CLIENTS

Most of the ACCI's clients are wealthy individuals and families. The Firm may also manage portfolios and provide investment advice to investment companies.

ACCI's cumulative minimum account is \$100,000. However, based on facts and circumstances ACCI Capital Investments LLC. may, at its sole discretion, accept accounts with a lower value.

ITEM VII METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

ACCI Capital Investments LLC primary approach is to use a tactical allocation strategy aimed at reducing risk and increasing performance. The advisor uses exchange listed securities, over-the-counter securities, foreign securities, corporate debt securities, CDs, variable life insurance, 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 mutual funds by using various criteria, such as the fund manager's tenure, and/or overall career performance. The advisor may recommend, on occasion, redistributing investment allocations to diversify the portfolio in an effort to reduce risk and increase performance. The advisor may recommend specific stocks to increase sector weighting and/or dividend potential. The advisor may recommend employing cash positions as a possible hedge against market movement which may adversely affect the portfolio.

The advisor may recommend 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.

There is a substantial risk of loss in trading in securities and other financial instruments. 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.

ITEM VIII DISCIPLINARY INFORMATION

Neither ACCI Capital Investments LLC 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 IX OTHER FINANCIAL INDUSTRY ACTIVITIES, BUSINESS ACTIVITIES AND AFFILIATIONS

ACCI Capital Investments LLC is affiliated to ACCI Capital Investments SGIIC S.A., an independent investment management company located in Madrid, Spain and regulated by the National Stock Exchange Commission of Spain (Comision Nacional del Mercado de Valores) and the US Securities and Exchange Commission (SEC) as a Foreign Investment Advisor (SEC # 801-112554). ACCI Capital Investments, SGIIC, S.A. provides financial advisory and planning services. The Company offers portfolio, wealth management, counseling, and concierge services. ACCI Capital Investments serves clients worldwide.

ITEM X CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

ACCI Capital Investments LLC 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 ACCI Capital Investments LLC deemed to be an Access Person and is intended to ensure that securities transactions effected by Access Persons of ACCI Capital Investments LLC 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. ACCI Capital Investments LLC 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. ACCI Capital Investments LLC maintains a code of ethics and they will provide a copy to any client or prospective client upon request.

ACCI Capital Investments LLC 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 ACCI Capital Investments LLC are not available to investors in the US (US investors).

ITEM XI BROKERAGE PRACTICES

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 may combine 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 may 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 may recommend 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. ACCI Capital Investments LLC may recommend 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 Firm is not compensated in any way with respect to making such recommendations.

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.

ACCI Capital Investments LLC 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 effect 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 ACCI'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 XII REVIEW OF ACCOUNTS

Accounts are monitored on an ongoing basis. The Portfolio Manager will review client accounts. The triggering factors would be the Firm becomes aware of a change in client's investment objective, a change in market conditions, change of employment, re-balancing of assets to maintain proper asset allocation and any other activity that is discovered as the account is reviewed. The client will receive written statements no less than quarterly from the trustee or custodian. 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.

The client is encouraged to notify the Advisor and Investment Advisor Representative if changes occur in his/her personal financial situation that might adversely affect his/her investment plan.

Accounts are re-balanced on a quarterly basis and re-optimized when deemed necessary by the Advisor or by third-party money manager for those participating in the Asset Management Program. Re-balancing is accomplished by reallocating assets to original asset targets and re-optimizing involves setting new target asset category percentages.

ITEM XIII CLIENT REFERRALS AND OTHER COMPENSATION

ACCI Capital Investments LLC, 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 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.

ACCI Capital Investments LLC does not currently maintain any Client Referral Agreements.

ITEM XIV 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 XV INVESTMENT DISCRETION

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. All discretionary trades made will be in accordance with each client's investment objectives and goals.

ITEM XVI 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 XVII FINANCIAL INFORMATION

ACCI Capital Investments LLC does not maintain any impairments or financial obligations that might prevent it from meeting any contractual obligation to its clients.

ITEM XVIII – REQUIREMENTS FOR STATE REGISTERED ADVISORS

1. State Registered Advisers are required to identify each of their principal executive officers and management persons, and describe their formal education and business background:

Mr. Jesus Maria Gil Garcia is a Director and CCO of ACCI.

Mr. Manuel Gil Garcia is a Director, Principal and Portfolio Manager for ACCI.

Please refer to Form ADV Part 2b for detailed information on ACCI principal executive's education and business experience.

2.- State Registered Advisers are required to describe any business in

which they are actively engaged (other than giving investment advice) and the approximate amount of time spent on that business.

Mr. Jesus Gil is a Director and Portfolio Manager of ACCI Capital Investments SGIIC, SA - Serrano 93, Madrid, Spain, since 2007. Mr. Gil dedicates approximately 80 HRS per month to this company (related to ACCI Capital Investment LLC). On October 15, 2013 Mr. Gil became an independent board member for a privately-owned pharmaceutical company, Labiana Life Science, S.A.V., located at c/ Venus, 26, Terrasa (Barcelona), Spain. This company is not an investment related company and is not publicly traded. He is not involved in any investment decisions for this company; nor is he required to spend time away from his ACCI duties.

Mr. Manuel Gil is a Director and Portfolio Manager of ACCI Capital Investments SGIIC, SA - Serrano 93, Madrid, Spain since 2007. He is an independent board member for a privately owned pharmaceutical company, Labiana Life Science, S.A.V., located at c/ venus, 26, terrasa (Barcelona), Spain. This company is not an investment related company and is not publicly traded.

3.- State Registered Advisers are required to disclose if the firm or a management person has been involved in one of the events listed below and disclose all material facts regarding the event:

To the best of our knowledge, none of the firm's registered advisers have been involved in an event that resulted in an award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500; or in a civil, self-regulatory organization, or administrative proceeding involving any of the following events:

- (a) an investment or an investment-related business or activity;
- (b) fraud, false statement(s), or omissions;
- (c) theft, embezzlement, or other wrongful taking of property;
- (d) bribery, forgery, counterfeiting, or extortion; or
- (e) dishonest, unfair, or unethical practices.

You may access their regulatory files by following this link:
[http://www.adviserinfo.sec.gov/\(S\(v0s1j0nivr4bef45caxf1155\)\)/IAPD/Content/Search/iapd_Search.aspx](http://www.adviserinfo.sec.gov/(S(v0s1j0nivr4bef45caxf1155))/IAPD/Content/Search/iapd_Search.aspx)

FORM ADV PART 2B - BROCHURE SUPPLEMENT

OCTOBER 2019

This brochure supplement provides information about the supervised persons listed below that supplement the ACCI CAPITAL INVESTMENTS LLC Brochure. Please contact Jesus Gil, CCO, if you have any questions about the contents of this supplement.

List of Supervised Persons

Jesus Gil, Director / Chief Compliance Officer
jgil@accipartners.com

Antonio De la Oliva, Director
adelaoliva@accipartners.com

Manuel Gil / Director / Principal / Portfolio Manager
mgil@accipartners.com

Javier Guerra / Director
jguerra@accipartners.com

ACCI CAPITAL INVESTMENTS, LLC

2000 Ponce de Leon Boulevard, Suite 516A
Coral Gables, FL 33134
Telephone: (305) 448-0014

Additional information about the above supervised persons is available on the SEC's website at www.adviserinfo.sec.gov.

MANUEL GIL
DIRECTOR / PRINCIPAL / PORTFOLIO MANAGER

Item 2 - Educational Background and Business Experience

Mr. Gil is a Director, Principal and Portfolio Manager for ACCI.

Manuel is a senior banker with over 17 years of experience in international DCM (Debt Capital Markets), with strong in-depth knowledge of Emerging Markets fixed income. He started his career in 2000 in New York as market analyst for the Trade Commission of Spain. From 2001 to 2006, he worked for Santander (Banesto) as proprietary trader, managing a 300 MM EUR book of LBO loans. In 2006 he joins BCP Securities LLC, an American boutique investment bank focused in EM bonds, as senior partner. He was a sales trader of High Yield and Emerging Markets bonds, covering European institutional clients. He is part of ACCI's portfolio management team.

Mr Gil holds a degree in Economics from Universidad de Granada, postgraduate studies from University of Miami and FINRA Series 7, 24 and 65 Certificates.

He speaks Spanish, English and French.

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. Gil is a Partner and Director of ACCI Capital Investments S.G.I.I.C., S.A., a wealth and asset management company based in Madrid, Spain and authorized by the National Securities Commission of Spain (Comision Nacional del Mercado de Valores).

Mr. Gil is a Board Member of Labiana Pharmaceuticals SA and Labiana Life Sciences, S.A., two Spanish private companies active in human pharma and animal health, respectively. He also holds a minority stake in both companies.

Item 5 - Additional Compensation

Mr. Gil is compensated for his work in ACCI Capital Investments S.G.I.I.C., S.A. and may receive compensation in the form of dividends from his other investments.

Item 6 - Supervision

Mr. Gil is directly supervised by the firm's CCO.

ANTONIO DE LA OLIVA **DIRECTOR**

Item 2 - Educational Background and Business Experience

Antonio de la Oliva is an Executive Director for ACCI. He graduated in Business Administration from the Universidad Pontificia de Comillas, ICADE (E2), Madrid in 2009 and also holds a Master in Financial Accounting from Instituto de Estudios Bursátiles de España.

Antonio has 10 years of experience in Finance. Antonio started working in 2010 in KPMG. Before founding ACCI Capital Investments SGIIC SA in Madrid, Spain, he worked before in Alchemia Advisors EAFI, advising HNMI on their Fixed Income strategies. He was in charge of designing optimal asset allocation models depending on each client's profile. Prior to his work in Alchemia, he worked in New York for BCP Securities LLC, a boutique investment bank focused on Emerging Market Debt.

In August 2019 he and his partners founded Acci Capital LLC and assumed functions as Director.

He is fluent in Spanish and English.

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. Antonio de la Oliva is founding partner in ACCI Capital Investments S.G.I.I.C., S.A., an asset management company based in Madrid, Spain and authorized by the National Securities Commission of Spain (Comision Nacional del Mercado de Valores). He has a role of executive director as well as Secretario no consejero.

Mr. Antonio de la Oliva has 95% ownership in Dauro Partners S.L. which is his private company where he is also sole administrator. Antonio is also sole administrator of Dauro Management S.L. and ACCI Family Office in Spain.

Item 5 - Additional Compensation

Mr. Antonio is compensated for his work in ACCI Capital Investments S.G.I.I.C., S.A. and may receive compensation in the form of dividends or working compensations from his other investments and or companies

Item 6 - Supervision

Mr. Antonio is directly supervised by the Board of the Company in ACCI Capital Investments SGIIC SA in Madrid and by the CCO for his activities in ACCI Capital Investments LLC.

JESUS GIL
Director / Chief Compliance Officer

Item 2 - Educational Background and Business Experience

Mr. Gil is a Director and CCO for ACCI. He graduated in Law from the University of Granada in 1999 and did a Master in International Politics and European Studies at the College of Europe in Bruges, Belgium, in 2000-2001.

Jesus is a senior banker with over 17 years of experience in international markets with a clear focus on Private Banking, and with strong in-depth knowledge in the Latam markets. He started his career in 2001 at the European Commission in Brussels, Belgium, and later on he moved to Geneva, Switzerland, in 2002 to start working for the World Trade Organization as legal expert. In 2006 he started his career at the Private Banking industry working for Citi Private Banking in Geneva covering Latam clients as junior banker. In 2008 he was hired by UBS in Geneva, Switzerland, to work as banker for External Asset Managers from Latam region. In 2010 he was promoted to Executive Director and started working at UBS as Business Developer for the same department. From 2013 to 2017 he was assigned to UBS Panama to continue his position from the UBS Panama offices. He resigned from UBS in October 2018 and joined Acci Capital in Spain as one of the founding partners.

In August 2019 he starts together with other partners founded Acci Capital LLC and assumed functions as CCO.

He speaks Spanish, English and French.

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. Gil is a Partner and Director of ACCI Capital Investments S.G.I.I.C., S.A., a wealth and asset management company based in Madrid, Spain and authorized by the National Securities Commission of Spain (Comision

Nacional del Mercado de Valores).

Mr. Gil is shareholder (0.62% ownership) of Labiana Pharmaceuticals SA and Labiana Life Sciences, S.A., two Spanish private companies active in human pharma and animal health, respectively.

Item 5 - Additional Compensation

Mr. Gil is compensated for his work in ACCI Capital Investments S.G.I.I.C., S.A. and may receive compensation in the form of dividends from his other investments.

Item 6 - Supervision

Mr. Gil is directly supervised by the Board of the Company.

JAVIER GUERRA **DIRECTOR**

Item 2 - Educational Background and Business Experience

Mr. Guerra is a Director for ACCI.

Javier brings an investment experience of €1.2b+ in private equity. He co-founded WHEB Infrastructure, where he was a member of the investment committee, responsible for investment origination and execution, and for the management and optimization of the portfolio. Before that he was involved in the inception of a €300m private equity fund. Additionally, he has over four years of experience in management consulting and investment banking. Javier holds a General Management Program (PDG) from IESE Business School, he's a Diplome Grande Ecole graduate from ESCP Europe in Paris, holds a MSc in Management at CASS Business School in London and a MSc in East Asia Studies.

He is a Spanish national, fluent in English, French, Italian and conversational Mandarin.

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. Guerra is a Partner and Managing Director of ACCI Capital Investments S.G.I.I.C., S.A., a wealth and asset management company based in Madrid, Spain and authorized by the National Securities Commission of Spain (Comision Nacional del Mercado de Valores).

Mr. Guerra is a director and owner of 99% of Gravitas Investments and Consulting, a company registered under the laws of Spain. He is also a director and 100% owner of GIC Capital LLC, a company registered under the laws of Florida, US.

Item 5 - Additional Compensation

Mr. Guerra is compensated for his work in ACCI Capital Investments S.G.I.I.C., S.A. and may receive compensation in the form of dividends from

his other investments.

Item 6 - Supervision

Mr. Guerra is directly supervised by the firm's CCO.

