



**Consultiva Internacional, Inc.**

**Form ADV Part 2A**

**March 30, 2012**

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This brochure provides information about the qualifications and business practices of Consultiva Internacional, Inc. ("Consultiva"). If you have any additional questions about the contents of this brochure, please contact us at (787) 763-5868. 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 Consultiva Internacional, Inc. is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Any reference to or use of the terms "registered investment adviser" or "registered," does not imply that Consultiva or any person associated with it has achieved a certain level of skill or training.

## Item 2- Material Changes

On July 28, 2010, the United States Securities and Exchange Commission published "Amendments to Form ADV" which amends the disclosure document that we provide to clients as required by SEC Rules. The Brochure dated April 19, 2011 (the "Initial Filing"), was prepared according to the SEC's new requirements and rules.

Pursuant to new SEC Rules, we are required to prepare a summary of any material changes to this Brochure within 120 days of the close of our fiscal year. In order to comply with this rule, we will deliver an updated Brochure, which will include a summary of any material changes, and deliver the entire document to you within 120 days of the close of our fiscal year.

Since the Initial Filing, Consultiva prepared an other than annual amendment dated June 15, 2011. This Brochure replaces the June 15, 2011 filing. Since that filing, Consultiva has updated its assets under management; however that change is not material.

Currently, our Brochure may be requested by contacting Consultiva at (787) 763-5868 or e-mailing your request to [info@consultiva.com](mailto:info@consultiva.com).

Additional information about Consultiva 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 of our affiliated persons who are registered, or are required to be registered, as investment adviser representatives of Consultiva.

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## Item 4- Advisory Business

### ***Our Company & Principals***

Consultiva is an independent investment management consulting firm. Myrna Rivera, Founder, CEO and Chairman, is the firm's majority shareholder. Consultiva is a federally registered investment adviser registered with the Securities and Exchange Commission under the Investment Advisers Act of 1940 and has been offering investment advisory services since February 2000.

### ***Services We Offer***

Consultiva provides investment advisory services for many types of clients (see Item 7 below for more information about our clients). Our process begins with an assessment of your needs and current circumstances, after which we will work with you to design a customized investment strategy and policy that will guide the investment process. Consultiva will then recommend the investment alternatives best suited to implement your customized strategy, including Independent Investment Manager(s) ("IIM(s)"). Once you have selected from these investment alternatives, we will assist you with the implementation of your chosen strategy.

Consultiva will provide ongoing evaluations of your portfolio's performance and will also assist you in identifying strategic market opportunities and diversifying your portfolio. Consultiva may also provide investment related consultations as you may require.

### ***Customization of Accounts & Restrictions on Investments***

Our services for you are customized and tailored to meet your specific individual or organizational needs and/or stated objectives within your governance and investment framework. After an in-depth assessment of your organizational or personal financial circumstances and goals, we will work with you to clearly define objectives and determine the most appropriate investment strategies to meet your goals. Strategies should reflect not only your specific growth and risk parameters, but also your views regarding specific types of investments or strategies you may wish to enhance or avoid.

### ***Access to Asset Wrap Management Programs***

We also offer asset supervision through a wrap program of your choice based on your custodial needs and relationships with broker-dealers, including Consultiva Securities, Inc. ("CSI"), our affiliated broker-dealer. Through CSI, we offer the Master's Program, a wrap fee program sponsored by Wells Fargo Advisors L.L.C. ("Wells Fargo Advisors"), a division of Wells Fargo & Company.

### ***Assets Under Management***

As of December 31, 2011, Consultiva had \$688,197,103 in non-discretionary assets under management and \$6,545,730 in discretionary assets under management.

## Item 5- Fees and Compensation

### *Compensation*

Consultiva's ongoing advisory fees are calculated based upon the assets we supervise for you (i.e., the total value of securities, money market funds and cash). Our fees are negotiable, influenced by your particular circumstances, such as your asset allocation, frequency of reporting, your geographic location, or other services you may require. Our fees for asset supervision are:

#### Retail Clients

<b>Retail</b>				<b>% Fee</b>	<b>\$\$ Fee</b>
Greater than	\$0	Less than	\$1,000,000	0.75%	\$7,500
Greater than	\$1,000,000	Less than	\$2,500,000	0.70%	\$17,500
Greater than	\$2,500,000	Less than	\$5,000,000	0.60%	\$30,000
Greater than	\$5,000,000	Less than	\$10,000,000	0.50%	\$50,000
Greater than	\$10,000,000	Less than	\$20,000,000	0.34%	\$68,000
Greater than	\$20,000,000	Less than	\$30,000,000	0.30%	\$90,000
Greater than	\$30,000,000	Less than	\$40,000,000	0.24%	\$96,000
Greater than	\$40,000,000	Less than	\$50,000,000	0.20%	\$100,000

#### Institutional Clients

<b>Institutional</b>				<b>Cumulative</b>		
	<b>Assets</b>	<b>% Fee</b>	<b>\$\$ Fee</b>	<b>Amount</b>	<b>% Fee</b>	<b>\$\$ Fee</b>
First	\$5,000,000	0.50%	\$25,000.00	\$5,000,000	0.50%	\$25,000
Next	\$5,000,000	0.35%	\$17,500.00	\$10,000,000	0.43%	\$42,500
Next	\$10,000,000	0.25%	\$25,000.00	\$20,000,000	0.34%	\$67,500
Next	\$20,000,000	0.15%	\$30,000.00	\$40,000,000	0.24%	\$97,500
Next	\$20,000,000	0.10%	\$20,000.00	\$60,000,000	0.20%	\$117,500
Next	\$84,000,000	0.07%	\$58,800.00	\$144,000,000	0.12%	\$176,300
Next	\$200,000,000	0.05%	\$100,000.00	\$344,000,000	0.08%	\$276,300

Fees cover investment monitoring, review and reporting. Transaction fees are in addition to our management fees. The IIM is required to seek best execution.

Our suggested minimum portfolio size is \$100,000

#### Institutional Clients – Fixed Income Only

<b>Institutional Fixed Income Only</b>				<b>Cumulative</b>		
	<b>Assets</b>	<b>% Fee</b>	<b>\$\$ Fee</b>	<b>Amount</b>	<b>% Fee</b>	<b>\$\$ Fee</b>
First	\$5,000,000	0.30%	\$15,000	\$5,000,000	0.30%	\$15,000
Next	\$5,000,000	0.21%	\$10,500	\$10,000,000	0.26%	\$25,500
Next	\$10,000,000	0.15%	\$15,000	\$20,000,000	0.20%	\$40,500
Next	\$20,000,000	0.09%	\$18,000	\$40,000,000	0.15%	\$58,500
Next	\$20,000,000	0.06%	\$12,000	\$60,000,000	0.12%	\$70,500
Next	\$200,000,000	0.04%	\$84,000	\$260,000,000	0.06%	\$154,500
Next	\$200,000,000	0.03%	\$60,000	\$460,000,000	0.05%	\$214,500

### **Master Program Fees** **Equity Balanced Accounts**

This program is a “wrap” account, inclusive of transaction and custody fees.  
Minimum account size is \$100,000

<u>Eligible Assets</u>	<u>Annualized Fee</u>
First \$250,000	1.50%
Next \$750,000	1.25%
\$1,000,000-\$2,000,000	1.00%
Over \$2,000,000	negotiable

Consultiva may also charge fixed or hourly fees that may be negotiated, depending upon the scope of a particular client’s needs or mandate.

### ***Deduction of Fees***

Fees for Consultiva’s services will be invoiced to you on a quarterly basis, unless we agree otherwise. Our fees are based on the value of your portfolio under our supervision at the beginning of each calendar quarter. You may direct your custodian to allow the deduction of fees on a quarterly basis in advance.

Certain large institutional or individual advisory relationships may be eligible for our commission recapture program. In order to qualify for the commission recapture program, CSI must be the broker of record and the transactions must exceed a certain threshold or volume of transactions. The “recaptured” commissions will be credited to offset your advisory fees.

### ***Other Fees and Expenses***

In addition to the investment advisory fees described above, your brokerage or custodial account may incur additional charges such as custody fees, transfer fees, wire fees, priority mail or postage fees, mutual fund fees (management and administrative), brokerage fees and commissions, mark-up/down and margin interest (if your portfolio is margined). Please see your sponsor’s brochure if you have a wrap account for details about these other fees and expenses.

### ***Payment of Fees in Advance***

Fees payable to Consultiva are charged in advance. If for any reason you decide to terminate your relationship with Consultiva, we request 30 days advance written notice. Upon receipt of your written termination notice, we will refund, on a pro rata basis, any unearned fees.

### ***Other Compensation***

If your assets are held at CSI, we may on occasion, receive additional compensation in the form of marketing service fees for mutual funds (i.e., 12b-1 fees) purchased in your account or compensation from certain insurance contracts. In the event your portfolio is a qualified ERISA Plan, such fees will be credited back to the Plan.

If you select CSI as your broker-dealer to execute transactions for your advisory accounts, you may be charged a commission, if the program you select is not inclusive of transaction fees. This additional compensation may be perceived as a conflict of interest; however Consultiva will assure that all recommendations are made in accordance with your investment objectives and goals, and

that the fees charged by CSI are competitive and that all efforts are made to provide best execution. If you have an IIM, then they, and not Consultiva, will monitor your execution fees for best execution.

Consultiva's advisory fees will not be reduced in the event of CSI's receipt of other compensation unless you have qualified for our commission recapture program. With the exception of the Master's Program, you have the option to direct the activity of your account through a broker-dealer that is not affiliated with Consultiva.

For additional information, please see Item 14 "Client Referrals and Other Compensation".

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

Consultiva does not charge a performance based fee or share of capital gains.

### **Item 7- Types of Clients**

Consultiva provides advisory services for the following types of clients: individuals and families, banks, pension and profit sharing plans, 401k plans, endowments, foundations, credit unions, Taft-Hartley plans, insurance companies, trusts and estates, charitable organizations, municipalities and corporations. Consultiva does not have any special fees or requirements to our clients beyond the fee schedule or minimum account sizes noted in Item 5, above.

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

Consultiva begins the consulting process with each client by engaging in an analysis in the following areas:

1. Evaluating your personal and financial circumstances ("Needs Analysis")
2. Performing capital markets research
3. Performing independent investment management research and due diligence
4. Investment cost analysis

#### ***Needs Analysis***

Consultiva employs a liability-based approach in assisting clients in defining and quantifying goals and objectives.

#### ***Capital Markets Research***

Consultiva professionals gather and examine studies, audit opinions, attend conferences and determine Consultiva's position on key issues, such as economic growth, expected returns, interest rates, current valuations and asset allocation. We continually receive and evaluate research of world economies and markets from third party sources, and develop conclusions to assess courses of action based upon your goals and objectives.

### ***Independent Investment Management Research and Due Diligence***

Consultiva continually researches and interviews investment management firms that we believe can add value to your portfolio when we construct teams to implement your investment strategy. Our goal is to build an optimum investment management team for you. Defining the most appropriate team of investment managers and funds will depend on the size of your total portfolio, the nominal investment objective required, the asset allocation required, and the investment policies and guidelines that are established as a result of the Needs Analysis. Once we determine the appropriate mix of assets, strategies and acceptable guidelines for your portfolio, we will evaluate the appropriate number and types of managers.

### ***Investment Cost Analysis***

Although inevitable, cost is certainly a manageable variable. We examine the various alternatives to accessing a manager or strategy, always mindful that the maximum benefit accrue to you. We explore potential managers for their access through cost effective management platforms and through pooled funds. Cost effective custody and trading options often times stem from these examinations.

### **Item 9- Disciplinary Information**

There is no material legal or disciplinary event to disclose related to Consultiva's business or its management.

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

#### ***Pending and Current Registrations with Broker-Dealers***

The majority of Consultiva's employees and senior management are dually registered with Consultiva and CSI. Employees are not allowed to register with an outside firm.

#### ***Pending and Current Registrations with the CFTC***

Consultiva is not registered with the Commodities and Futures Trading Commission, nor does Consultiva advise clients on commodities or futures markets.

#### ***Material Relationships and Conflicts of Interest***

Consultiva does not pay a referral fee or share investment advisory fees with anyone who is not registered as an investment adviser.

#### ***Recommendation and Selection of other Investment Advisers***

Consultiva's primary business is to help you assess the probability of achieving their investment objectives and to craft a team of independent investment managers/funds to actively manage your portfolio. During our initial investment manager or investment fund evaluation, we examine results that generally meet CFA Institute standards for how managers publish their performance records. We review the quality of each candidate's record and take great care to ensure that the manager's or fund's record is (1) a fair representation of their true performance and (2) achievable within your investment policy guidelines. The client makes the final decision to select (or not select) an IIM or fund.

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

All Consultiva employees are deemed "access persons" and are subject to Consultiva's Code of Ethics (the "Code"). Unless prior permission from Consultiva's Chief Compliance Officer (the "CCO") is given, all personnel are prohibited from purchasing a security for a personal securities account in an initial public offering or in a private placement. These restrictions do not apply to trades with respect to U.S. government securities. These restrictions also would not apply to accounts in which the applicable personnel have an interest but which are subject to a discretionary investment management agreement, whether with Consultiva or another manager.

Within 10 days of employment, access persons are required to submit to the CCO (a) an acknowledgement that they have read and understood the Code and (b) a statement disclosing all securities in which personnel have any direct or indirect beneficial ownership other than types of securities that are exempt under the Code.

All access persons must report all personal securities transactions quarterly and certify on an annual basis that they have read and understood the Code and have disclosed all personal securities transactions required pursuant to the Code. Consultiva will provide a copy of the Code to any client or prospective client upon request.

Consultiva permits its employees to engage, on a limited basis, in personal securities transactions. To avoid any potential conflicts of interest involving personal trades, Consultiva adopted the Code, which includes formal insider trading, information barriers, and personal securities transactions policies and procedures. The Code requires, among other things, that access persons:

1. Place client interests ahead of Consultiva's,
2. Engage in personal investing that is in full compliance with the Code,
3. Avoid taking advantage of their position, and
4. Maintain full compliance with applicable federal securities laws.

The Code also requires access persons to: (1) pre-clear certain personal securities transactions including investments in initial public offerings (IPOs) and private placements, (2) report personal securities transactions on at least a quarterly basis, and (3) provide Consultiva with a detailed summary of holdings (both initially upon commencement of employment and annually thereafter) over which the access person has a direct or indirect beneficial interest.

Clients may authorize Consultiva to use CSI as the client's broker-dealer. With client authorization, CSI may act as agent for the buyer and/or seller when instructed to do so by the client or the IIM of such client's portfolios. CSI does not participate in underwritings, is not a market maker and does

not execute principal trades for client accounts. All transactions for client accounts are executed through First Clearing LLC, an affiliate of Wells Fargo Advisors, or the client's custodian.

### **Item 12- Brokerage Practices**

Consultiva does not receive research, products or services in connection with client securities transactions. Consultiva also does not direct brokerage to any other broker-dealer or third party in exchange for referrals.

With the client's permission, Consultiva may direct business to CSI, based upon best execution principles. When CSI cannot provide best execution, Consultiva will direct trades to other broker-dealers. If a client instructs Consultiva to execute trades through a certain broker-dealer, Consultiva will not monitor those execution costs unless we have agreed to do so, in writing, on your behalf. Consultiva does not currently provide consulting services in exchange for directed brokerage.

Consultiva does not aggregate trades; however an IIM may do so when it results in best execution.

### **Item 13- Review of Accounts**

On a quarterly basis, clients receive a written report that presents investments, portfolio performance and profits/losses of holdings. This performance is compared to benchmarks that best represent a client's stated investment objectives. Consultiva is able to meet with clients and discuss the quarterly report and address any questions or issues raised by the client.

Additionally, at least annually, accounts are randomly selected and reviewed by Consultiva's independent auditors. In addition, personnel from Consultiva's supervisory staff randomly select and review accounts based on exception reports (factors which note activity or performance that was unexpected). This process is performed on a continual basis.

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

On occasion, Consultiva may receive client referrals from independent solicitors. Solicitors may need to be registered as an investment adviser and they will provide you with necessary disclosure forms which require client acknowledgement and signature. Solicitors will be compensated by Consultiva and will receive a portion of our advisory fees.

Neither Consultiva nor its personnel receive any items of value, in the form of prizes, awards or items of economic benefit, from non-clients.

### **Item 15- Custody**

The clearing agent, providing securities transactions and back office support for client accounts, is First Clearing LLC, unless a different custodian is selected by the client. First Clearing LLC will send clients monthly account statements, and in certain cases quarterly statements. Consultiva prepares quarterly performance reports of client activity unless a different time period has been negotiated. Consultiva will compare a client's IIM statements to the clearing agent or custodian

statements and attempt to reconcile any differences. However, if the client notes any differences, such differences should be reported immediately to Consultiva and the custodian.

#### **Item 16- Investment Discretion**

Generally, relationships with Consultiva are advisory, not discretionary. However, upon a client's specific request, Consultiva may assume limited discretion for the purchase and sale of securities in a client's portfolio.

#### **Item 17- Voting Client Securities**

Consultiva does not vote proxies on behalf of clients. Clients or their IIM will receive all proxies from the custodian, directly from the company or the transfer agent. Clients may receive proxies electronically as well.

#### **Item 18- Financial information**

Consultiva has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.