

## **ITEM 1 - ADV PART 2A, BROCHURE**

**March 31, 2015**

### **Pariter Wealth Management Group, LLC**

243 Road #2

Guaynabo, PR 00966

[www.pariterwmq.com](http://www.pariterwmq.com)

This brochure provides information about the qualifications and business practices of Pariter Wealth Management Group, LLC ("PWMG"). If you have any questions about the contents of this brochure, please contact [bnieves@pariterwmq.com](mailto:bnieves@pariterwmq.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.

PWMG 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 PWMG also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by using a unique identifying number known as a CRD number. PWMG's CRD number is 146622.

## ITEM 2 - MATERIAL CHANGES

The United States Securities and Exchange Commission requires that we provide to all clients an annual summary of material changes in the ADV Part 2A. This summary discusses only specific material changes that are made to the Brochure since the last revision (March 2011). We may further provide other ongoing disclosure information about material changes as necessary, at any time, without charge.

A complete Brochure may be requested by contacting Braulio Nieves, Chief Compliance Officer, at [bnieves@pariterwmg.com](mailto:bnieves@pariterwmg.com) or 787-781-2555. This Brochure is also available on our web site at [www.pariterwmg.com](http://www.pariterwmg.com) under the Disclosure link located on the Home page.

**March 2015:** PWMG is amending this brochure previously dated March 2014 as part of the annual update requirement. There are no material changes to this March 2015 amendment.

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## **ITEM 4 - ADVISORY BUSINESS**

### Our Company & Principals

PWMG is an SEC registered investment adviser with its principal place of business located in Guaynabo, Puerto Rico. It was established in February 2008. Francisco Rivera Fernandez, is its founder and President.

### Type of Services We Offer

We provide investment advisory services, financial planning, tax planning, estate planning, and retirement planning for individuals, corporations, trusts, and other entities. Our investment advisory services are fee-based. Most of client accounts are managed on a discretionary basis, although we do offer our services on a non-discretionary basis. We may also furnish advice via consultations on various matters as directed and contracted by you. Please see item 7, for the type of clients for whom we manage assets.

### Customization of Accounts & Restrictions on Investments

Our services are offered to you only after obtaining detailed financial information and other pertinent dates about your current situation and financial goals. Once we have completed assessing your needs we evaluate our complete universe of investment research and managers to build the optimal portfolio with careful consideration of your risk tolerance, investment objectives, income and liquidity needs.

As mutually agreed to by us, you may restrict certain type of investments in your account.

### Client Assets Managed by Us

As of December 31, 2014 our total assets under management is \$148,465,642. The discretionary portion of these assets is \$148,465,642.

## **ITEM 5- FEES AND COMPENSATION**

### Compensation

We do not have a minimum account size for accounts. Our fees are negotiable and based upon the type of services you need, household assets under management (related accounts) and the size of your portfolio. Our maximum fee for management services will not exceed 2.0% of the total account value of your portfolio. This fee is calculated at the end of the quarter, based upon the average daily balance of your portfolio during the prior quarter. This will include cash, and cash equivalent items.

### Deduction of our fees

With your authorization the management fee(s) for your account will automatically be deducted from available cash or your money market fund.

### Other Fees You May Pay

In addition to management fees your account may incur the following charges: Custody, transfer fees, wire fees, priority mail or postage, mutual fund fees (management & administrative), brokerage fees and commissions (or markup/down), margin interest (if margin account.) If your trades are executed through our affiliate Pariter Securities, you will incur a minimal trade execution charge that will vary dependent upon the type and quantity of the security purchased or sold.

See Item 12 for additional information about your brokerage fees.

### Payment of Fees In advance and Account Termination

We will calculate your fees from the date your account is funded, pro-rated on your funding balance through the end of the quarter. That fee will be deducted from your available cash or money market account. All quarterly fees will be calculated at the end of each calendar quarter, based on the average daily balance of the account, including cash and cash equivalent items during the prior quarter, and charged in advance for the following quarter. Upon your termination of your account, your fee will be pro-rated and all unearned fees will be credited or refunded to you. You will only be charged fees for

the actual days your portfolio is managed by us.

#### Other Compensation We May Receive

In the event you selected our affiliated broker dealer Pariter Securities, LLC (PS) your account will be charged a transaction fee for the transactions executed in your account. We may also receive additional compensation in the form of service fees (i.e. 12(b)-1 fees for mutual funds purchased for your account. In the event your portfolio is a qualified ERISA Plan, such fees will be credited back to the Plan. When we execute a trade through PS, we will do so based upon best execution; our affiliate PS may receive a transaction fee and the executing broker dealer will receive a commission, mark-down or mark-up. This additional compensation may be a conflict of interest, however PWMG will assure that all recommendations are made in accordance with your investment objectives and goals, and that the total fees charged are competitive and provide best execution.

PS has an agreement in place with Axiom Capital Management, LLC ("Axiom") whereby all persons or entities referred to Ascendent Capital, LLC ("Ascendent"), a branch office of Axiom, by PS that subscribe to GPB managed funds, Axiom will assign a 40% share of Ascendent's membership interest in GPB SLP, LLC based on a pro-rata share of investors PS brings into the fund. GPB, SLP, LLC is the entity that is entitled to receive the profits allocations from GPB managed funds. This additional compensation arrangement for PS may present a conflict of interest for PWMG. In making investment recommendations, PWMG will consider your investment objectives and goals and that an investment in GPB managed funds is in your best interest.

Our advisory fees will not be reduced in the event of PS's receipt of other compensation. You have the option to direct the activity in your account through a broker dealer that is not affiliated with us.

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

### **ITEM 6 - PERFORMANCE BASED FEES and SIDE-BY-SIDE MANAGEMENT**

Pariter Wealth Management Group, LLC does not manage accounts for a performance-based fee or participate in side-by-side management. Performance based fees are fees that are based on a share of capital gains or capital appreciation of a client's account. Side-by-side management refers to the practice of managing accounts that are charged performance-based

fees while at the same time managing accounts that are not charged performance-based fees.

## **ITEM 7 - TYPES OF CLIENTS**

PWMG provides investment advisory services to individuals, high net worth individuals, corporations and business owners. We also offer investment management services to pension and profit-sharing plans, institutions, foundations, and endowments.

PWMG does not require a minimum account size, however you should be advised that smaller accounts are more difficult to diversify and rebalance and may not experience the same performance as larger accounts.

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

We primarily offer a fee based investment platform on a discretionary basis based on your financial goals, suitability and risk tolerance.

Our process starts with several steps of analysis for us to determine the proper and prudent recommendation(s) for your portfolio:

- 1. Data Gathering** of your financial situation, goals and income or liquidity needs for your account.
- 2. Analysis** of the available financial strategies applicable to your situation.
- 3. Implementation** of an individualized portfolio based on the objectives you have identified.
- 4. Follow up** of the investments and continuous monitoring of your portfolio.

In order to accomplish your goals we may invest in multiple market sectors and global markets such as stocks, bonds, open end and closed end funds, ETF s, real estate investments trusts (REIT s), limited partnerships and others with the goal of minimizing risk and providing the proper diversification according to your stated objectives.

Through the analysis process, PWMG utilizes different sources of information and market overview such as Morningstar, Bloomberg, Thompson One Reuters, Closed End Fund Association (CEFA), Electronic Municipal Market Access (EMMA), research published by Forbes Tax Advantage Investors, Roger Conrad s Canadian Edge, Street Authority Market Advisors, Argus Market Watch, Barrons and others.

Performance and capital preservation are not guaranteed; constantly changing market

conditions create the necessity of constantly reevaluating your portfolio. On a periodic basis each and every position and sector of your portfolio will be analyzed. Depending on the market conditions, positions and sectors that have a poor performance and/or outlook will be taken out of the strategy. On the contrary, if a position or a sector provide a positive outlook and fits your risk tolerance and strategy; it will be implemented for your portfolio. Our asset rebalancing process is implemented according to the appreciation or depreciation of the assets in your portfolio. The overexposed positions (sectors) will be sold to acquire positions (sectors) that are underexposed in that portfolio.

One of the most important criteria to be analyzed is the cost effectiveness of the selected product(s). During the selection process, we will take into consideration aspects such as fund loads, fees and any other expense that could affect your returns.

### **Risk**

The investment returns and principal value on the stocks, open end and closed end mutual funds, and bonds fluctuate, and may be worth more or less than their original cost. Closed end mutual funds trade on the secondary market and carry a liquidity risk; our financial consultant may utilize leverage strategies to enhanced the yield. On the other hand, leverage may increase price volatility and market risk. Investment instruments like REITs and limited Partnerships do not trade on the secondary market and do not have immediate liquidity. You may only invest in this type of an investment if you are an accredited investor.

## **ITEM 9 - DISCIPLINARY INFORMATION**

Registered investment advisers are required in this item to provide you with all material facts regarding any legal or disciplinary events that would be material to your evaluation of PWMG.

No disciplinary events exist for PWMG or its management.

## **ITEM 10 - OTHER FINANCIAL INDUSTRY ACTIVITIES and AFFILIATIONS**

PWMG is an affiliate of Pariter Securities, LLC, a registered broker/dealer and member of FINRA (Financial Industry Regulatory Authority) and SIPC (Securities Investor Protection Corporation). PWMG is also an affiliate of Pariter Risk Management, an insurance agency.



As such, investment adviser representatives of PWMG are licensed to sell securities and insurance products for separate commission based compensation. As a result of such sales activity, there may be a potential conflict of interest.

Some of the employees of PWMG may work for one, or more of the affiliated companies. However, their services are primarily offered through PWMG; the time generally spent with the other affiliates is for the purpose of executing and implementing the investment decisions made by and through PWMG.

## **ITEM 11 - CODE OF ETHICS**

PWMG has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at PWMG must acknowledge our Code of Ethics annually.

If you would like a copy of this document please request it from the contact person shown on the top of this brochure.

## **ITEM 12 - BROKERAGE PRACTICES**

### **A. Factors in recommending or selecting brokers to execute trades**

#### **1. Research or Soft Dollar Benefits**

We do not receive research or soft dollar benefits for the execution of trades in your accounts.

#### **2. Brokerage for Client Referrals.**

In our selection or recommendation of broker/dealers for your account we do not consider any referrals from any broker/dealer or third party.

#### **3. Directed Brokerage.**

Not all advisers require clients to direct brokerage. With your permission we will direct your business through our affiliate Pariter Securities, based upon them obtaining best execution for your transaction(s) through your custodial broker/dealer National Financial Services. In the event a client directs PWMG to use

another broker/dealer, the client may negotiate their own arrangement with that broker/dealer in accordance with their own needs. In this event PWMG will not be responsible for monitoring best execution.

## **B. Aggregation of Trades**

When possible we will aggregate trades, and allocate them to the applicable account. Aggregated trades normally provide the lowest execution cost.

## **C. Agency Cross Securities Transactions and Principal Transactions**

It is our policy that the firm will not do any “agency cross securities transactions”. An “agency cross transaction” is defined as a transaction where a person acts as an investment adviser in relation to a transaction in which the investment adviser, or any person controlled by or under common control with the investment adviser, acts as broker for both the advisory client and for another person on the other side of the transaction.

PWMG may on occasion effect principal transactions for client accounts with its affiliated Broker Dealer, Pariter Securities, LLC. Principal transactions are generally defined as transactions where an adviser, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to any advisory client. When acting as principal, Pariter Securities, LLC will buy or sell securities for its own account, accept the risk of market price and liquidity fluctuations and receive a dealer’s profit or loss when executing an order. When executing orders in fixed-income securities as principal, Pariter Securities, LLC receives a dealer markup or markdown on such transactions. Such transactions will be documented with a full disclosure of PWMG’s role in the transaction to the client prior to execution or settlement. The client must acknowledge their understanding and agreement with PWMG’s role in the transaction pursuant to the requirements outlined in Sec. 206(3)-2 of the Investment Advisers Act of 1940. Prior to engaging in principal transactions with a client, PWMG will determine that such transactions are in the best interests of the client including PWMG’s duty with respect to the best price and execution for transactions for our clients..

For each client that engages in principal transactions with Pariter Securities, LLC PWMG will send a written disclosure, no less frequently than annually, containing a list of all principal transactions executed in the client’s account, the date, and the total amount of remuneration received, or to be received, by Pariter Securities in connection with the transaction.

## **ITEM 13 - REVIEW OF ACCOUNTS**

We review your account on a transactional as well as a quarterly basis. You will receive a quarterly performance report that will show your investments, your rate of return and profits/losses on your position. This will be compared to the indices that best represent your stated investment objective. On a random basis your financial consultant's supervisor will select accounts to review.

## **ITEM 14 - CLIENT REFFERALS and OTHER COMPENSATION**

A solicitor is defined as a third-party (non-employee) who solicits or refers new investment advisory clients to an investment adviser. PWMG may use the services of solicitors and pay cash compensation to the solicitor for referring prospective advisory clients to PWMG. The solicitor's cash compensation is based on a percentage of advisory fess received by PWMG from a solicited client. Client investment advisory fees are not increased as a result of payments made to solicitors.

PWMG may use research information provided by our clearing firm, National Financial Services, whom acts as the custodian for your investment advisory account. PWMG does not have an agreement to compensate National Financial Services for the receipt of such research information. WM dos not accept any form of compensation, including cash, sales awards or other prizes, from a non-client in conjunction with the investment advisory services we provide to you.

## **ITEM 15 - CUSTODY**

PWMG does not have custody of any of the assets in your account. Your account assets will held by National Financial Services, an independent, qualified custodian. The custodian will send you trade confirmations for any trading that we do on your behalf. They will provide you with monthly statements that include all of the transactions in your account. If there is no activity in your account, the statement will be sent quarterly. You should review these statements promptly when you receive them.

## **ITEM 16 - INVESTMENT DISCRETION**

Clients may engage Pariter Wealth Management Group LLC services on either a discretionary or a non-discretionary basis. In the event you decide to contract PWMG on

a discretionary basis, PWMG may have broad discretionary authority to determine the time, type and amount of securities to be bought or sold. In all cases, our discretion will be exercised in a manner consistent with the stated investment objectives for your account. When we select the securities and amount of those securities, we observe the investment limitations and restrictions you have given us for your account.

PWMG will not accept discretion for the transfer of your assets, or withdrawals from your account; you must authorize such activity in writing to us.

See Item 4 above, for more information.

## **ITEM 17 - VOTING CLIENT SECURITIES**

PWMG does not vote proxies on behalf of its investment advisory clients. You will receive proxy voting material direct from the issuer, transfer agent or custodian and will be responsible for voting your own proxies.

PWMG does not tender instructions for securities pursuant to tender offers or class actions. You will be responsible for initiating participation in tender offers or class actions by securities issuers.

## **ITEM 18 - FINANCIAL INFORMATION**

Registered investment advisers are required in this item to provide you with certain financial information or disclosures about PWMG's financial condition. PWMG has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to its clients and has not been the subject of a bankruptcy proceeding.

## **ITEM 19 - REQUIREMENTS FOR STATE-REGISTERED ADVISERS**

**ADV PART 2B, BROCHURE SUPPLEMENT  
MARCH 2014**

**Pariter Wealth Management Group, LLC**

243 Road #2

Guaynabo, PR 00966

[www.pariterwmg.com](http://www.pariterwmg.com)

787-781-2555

**FRANCISCO RIVERA FERNANDEZ  
JAVIER REYES  
BRAULIO NIEVES ROMÁN**

This Brochure Supplement provides information about Francisco Rivera Fernandez, Javier Reyes and Braulio Nieves Román that supplements the Pariter Wealth Management, LLC Brochure. You should have received a copy of that Brochure. Please contact Braulio Nieves at [bnieves@pariterwmg.com](mailto:bnieves@pariterwmg.com) if you did not receive Pariter Wealth Management LLC's Brochure or if you have any questions about the content of this Brochure Supplement.

Additional information about Francisco Rivera Fernandez, Javier Reyes and Braulio Nieves Román is available on the SEC's website at [www.adviserinfo.set.gov](http://www.adviserinfo.set.gov). You can search this site by using a unique identifying number, known as a CRD number. Francisco Rivera Fernandez's CRD number is 2303039, Javier Reyes' CRD number is 3014365 and Braulio Nieves Román's CRD # is 4314517.

## **Francisco Rivera Fernández**

### **2. Educational Background and Business Experience**

Mr. Francisco Rivera Fernández founded Pariter Wealth Management Group, LLC (PWMG) in 2008. He is its President and principal owner. Mr. Rivera is also the sole shareholder of Pariter Securities LLC, an affiliated broker dealer, and Pariter Risk Management, an affiliated insurance agency. Mr. Rivera has more than 20 years of experience as a financial consultant, working with the preparation and implementation of financial strategies and solutions for individual clients and business owners.

From 1991 to 2009, Mr. Rivera was a Senior Financial Consultant with Signator Investors, where he managed and supervised portfolios for high net worth individuals and retirement plan accounts. During his last five years with Signator Investors Mr. Rivera was ranked as one of their top investment managers, and for fifteen years he was their top state level manager. Also from 1991 until 1997 he was an agent for John Hancock, after which he became an independent agent with Signator, where he qualified as a John Hancock Chairman's Council Member for 12 years. He was a two-time recipient of the John Hancock Quality Service Award, and was ranked for five years as an investment and advisory products leader. Furthermore, Mr. Rivera has received various awards and designations from Eaton Vance Funds and Oppenheimer Funds. Born in Puerto Rico in 1969, he attended the University of Puerto Rico, where he graduated Magna Cum Laude with a BS degree in Accounting and Finance.

### **3. Item Disciplinary Information:**

Mr. Rivera was involved in a customer complaint that was settled in 2007, without him contributing to the settlement. Details about this event may be reviewed at: <http://www.finra.org/Investors/ToolsCalculators/BrokerCheck/>

In order to review this event you should enter his first and last name in the pop up window.

### **4. Other Business Activities**

Mr. Rivera is also an insurance broker; president of CCR Development, a soda concentrate manufacturing company; president of FJR Acquisition Corp., a billboard real estate company and he is in advertising services with Focal Point Media Corp.

### **5. Additional Compensation**

Mr. Rivera as sole shareholder of Pariter Securities LLC and Pariter Risk Management will share in the profits earned by those companies.

### **6. Supervision**

Activity in accounts managed by Mr. Rivera may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Javier Reyes, who may be reached at 787-781-2555, performs those reviews.

## **Javier Reyes**

### **2. Educational Background and Business Experience**

Mr. Javier Reyes is Vice President of Pariter Wealth Management Group, LLC (PWMG) and President of Pariter Securities LLC, its affiliated broker dealer. He is also an agent for Pariter Risk Management, an insurance affiliate. He received a BA in Business Administration from the University of Puerto Rico.

Mr. Reyes began his financial career in 1998 working for Jefferson Pilot Securities Corporation, after which he went to work for Washington Square Securities, Inc. While with Washington Square Securities Mr. Reyes managed and supervised portfolios for high net worth individuals, pension plans and trusts. In 2001 he went to work for John Hancock Financial Services. In 2001 he also joined Signator Investors, Inc. as an Investment Adviser, where he prepared and implemented portfolio management strategies for high net worth individuals. He also advised clients on estate tax planning, successions and business planning. He remained licensed with John Hancock and Signator until 2008 when he joined Pariter Securities, LLC; PWGM; and Pariter Risk Management. Mr. Reyes was born in 1973 and is a resident of Puerto Rico.

### **3. Item Disciplinary Information:**

Mr. Reyes has no legal or disciplinary events.

### **4. Other Business Activities**

Mr. Reyes is not involved in any outside business activities.

### **5. Additional Compensation**

Mr. Reyes is compensated by Pariter Securities, LLC, and as an agent of Pariter Risk Management will receive compensation for insurance products.

### **6. Supervision**

Activity in accounts managed by Mr. Reyes may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Francisco Rivera, who may be reached at 787-781-2555, performs those reviews.

## **Braulio Nieves Román**

### **2. Educational Background and Business Experience**

Braulio Nieves Román is a Registered Investment Advisor, specializing in retirement planning, specifically in custom made strategies involving defined benefit/defined contribution plans. He is also the chief compliance officer of PWMG, and principal and head of operations of Pariter Securities LLC. He also serves as president of Pariter Risk Management, an insurance agency. Prior to joining PWMG, from 2001 to 2008, he worked as an Investment Advisor Representative working along with Francisco Rivera at John Hancock Financial Services and Signator Investors, working as a financial planner for individuals as well as businesses. He also has over 10 years of experience in the insurance industry. Mr. Nieves graduated from the University of Puerto Rico, with a bachelor's degree in Advertising and Public Relations. He holds Series 6, 7, 63, 65, and 24.

### **3. Item Disciplinary Information:**

Mr. Nieves has no legal or disciplinary events.

### **4. Other Business Activities**

Mr. Nieves is and insurance broker for property & casualty insurance.

### **5. Additional Compensation**

Mr. Nieves is compensated by Pariter Securities, LLC, and as an agent of Pariter Risk Management will receive compensation for insurance products.

### **6. Supervision**

Activity in accounts managed by Mr. Nieves may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Francisco Rivera, who may be reached at 787-781-2555, performs those reviews.