

## **1. ADV Brochure Part 2A**

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

A Registered Investment Adviser

IARD #

243 Road #2

Guaynabo, PR 00966

<http://www.PariterWMG.com>

March 2011

Registration does not imply a certain level of skill or training.

**This brochure provides information about the qualifications and business practices of Pariter Wealth Management Group, LLC. If you have any questions about the contents of this brochure, please contact [BNieves@PariterWMG.com](mailto:BNieves@PariterWMG.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.**

**Additional information about [Pariter Wealth Management Group, LLC](#) also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)**

## **2. MATERIAL CHANGES**

You will find that this document is changed in appearance and description from our former Brochure dated May 2010. It is redesigned to implement a new written format implemented by the Securities and Exchange Commission effective 2011. In reviewing this document you will find that we have not had any material changes since our last brochure.

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## **4. ADVISORY BUSINESS**

### **A. Our Company & Principals**

Established in 2008, Pariter Wealth Management Group, LLC (**PWMG**) Pariter Wealth Management Group LLC is wholly owned by Mr. Francisco Rivera Fernández, who is the founder and President of Pariter Wealth Management Group LLC.

### **B. Type of Services we offer.**

We provide investment management services, financial planning, tax planning, estate planning, and retirement planning for individuals, corporations, trusts, and other entities. Our investment advisory services are offered on a fee only basis. 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 E, for the type of clients for whom we manage assets.

### **C. 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. Or, you will not be able to restrict the type of investments in your account.

### **D. Wrap Fee Programs**

We do not offer our services through a wrap program. All of our clients receive individually managed portfolios.

### **E. Client Assets Managed by Us.**

We manage assets on a discretionary basis, as of March 25, 2011 our discretionary assets under management totaled \$84,008,326 and our non-discretionary assets under management totaled \$1,389,674.

## 5. FEES AND COMPENSATION

### A. 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 size of your portfolio. Our maximum fee charged for services will not exceed 2.0% of the assets invested in 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.

### B. 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.

### C. 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 mark-up/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.

### D. Payment of Fees In advance and Account Termination

We will calculate your fees from the date your account is funded pro-rated 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 in advance 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. 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.

### E. 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.

Although not our practice, in the event we need to execute a trade through PS, and a commission or mark-down or mark-up is charged we will do so based upon best execution, and our affiliate may receive a fee. 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 fees charged by PS are competitive and provide best execution.

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."

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

Pariter Wealth Management Group, LLC. does not manage accounts for a performance based fee, or share of capital gains.

## **7. TYPES OF CLIENTS**

Pariter Wealth Management Group LLC provides investment management services to high net worth individuals, corporations and business owners. We also offer investment management services to pension and profit-sharing plans, institutions, foundations, and endowments.

We do not have any special fees or requirements for our accounts in addition to the fee schedule noted in item 5, above.

## **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 quarterly basis. On a regular 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 our selectection 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 REIT's 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.



## **9. DISCIPLINARY INFORMATION**

We are required to disclose any of the following legal or disciplinary events that may be material to a client's or potential clients evaluation. We have no events or disclosures to make on behalf of our firm or management personnel.

## **10. OTHER FINANCIAL INDUSTRY ACTIVITIES and AFFILIATIONS**

### **A. Pending and Current Registrations with broker/dealers.**

Pariter Securities LLC is an affiliate of Pariter Wealth Management LLC, and a registered securities broker/dealer and member of FINRA (Financial Industry Regulatory Authority.) Pariter Risk Management is an insurance agency affiliate of PWM, insurance products that are regulated as securities may also be offered through Pariter Securities. Some of the employees may work for one, or more of the affiliated companies. However, their services are primarily offered through PWM; the time generally spent with the other affiliates, is for the purpose of executing and implementing the investment decisions made by and through PWM.

We do not allow our representatives to dually register with an unaffiliated broker/dealer.

### **B. Registrations or applications of our Firm or associated person(s) with futures commission, or commodity pool operators.**

Neither our Firm nor our financial consultants are registered, or pending registration with the Commodities and Futures Trading Commission, or Commodities Board.

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

Our material relationships are with our affiliates, as described above (in A.) You should know that insurance products might result in a higher compensation to the agent on a transaction basis.

### **D. Recommendation and selection of other investment advisers for your account(s.)**

We manage your account(s) we do not recommend or select other investment advisers.

## 11. OUR CODE OF ETHICS

### Participation or Interest in Client Transactions and Personal Trading

#### A. Code of Ethics

Pariter Wealth Management LLC 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.

#### B. Participation or Interest In Client Transactions

Our Firm and our advisory affiliates do not recommend, buy or sell securities for you account in which we or our related person have a financial interest.

#### C. Personal Trading

Our Firm allows employees to trade in the same securities as for your account. At no time may they receive a better price than you do for your account, nor may they trade for their own accounts in amounts that could affect the price of a security. Their personal trading is closely monitored to assure that they are placing your interest ahead of their own.

## 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 may not be responsible for monitoring best execution.

#### **B. Aggregation of Trades**

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

## **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 consultants supervisor will select accounts to review.

## **14. CLIENT REFFERALS and OTHER COMPENSATION**

We often invest in Mutual Fund companies for your account. We may receive fees for those products from the Mutual Fund Company. Sales of mutual funds to you must meet your stated account needs and objectives, and all sales must meet our criteria for performance ranking.

We do not have any arrangements with Solicitors for referrals, nor do we participate in sales contests sponsored by outside companies.

## **15. CUSTODY**

The qualified custodian for your account is National Financial Services. They will send you quarterly account statements, unless you have monthly activity (purchases, sales, deposits, etc.) that will generate a monthly statement. Our Firm will send you quarterly performance statements of your activities, you should compare our statements to the custodians statements and report any error immediately, preferably in writing to us and the custodian.

## **16. INVESTMENT DISCRETION**

Clients may engage Pariter Wealth Management Group LLC services on either a non-discretionary, or 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 procedures, limitations and restrictions you have given us for your account.

PWMG do 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(E) above, for more information.

## **17. VOTING CLIENT SECURITIES**

We do not vote proxies on behalf of you of your account. You will receive all proxies from your custodian or the company or transfer agent. You may receive these electronically as well. If you wish to discuss the matters contained in the proxy please call your financial adviser.

## **18. FINANCIAL INFORMATION**

### **A. Custody**

We do not have custody of your assets and may only charge our fees automatically from your account with your written permission.

### **B. Our Financial Condition**

We do/do not have any financial condition that could reasonably be expected to impair our financial commitment to you.

**Part 2B of Form ADV:****1. Brochure Supplement**

**Pariter Wealth Management Group, LLC**  
A Registered Investment Adviser

IARD #

243 Road #2

Guaynabo, PR 00966

<http://www.PariterWMG.com>

787-781-2555

March 2011

This Part 2B Brochure Supplement augments the ADV Part 1A, and should be reviewed by you as one document to provide you with information about Pariter Wealth Management Group, LLC. and your financial adviser. If you did not receive Part 2A, or have any questions about this brochure, please contact Braulio Nieves at [bnieves@pariterwmg.com](mailto:bnieves@pariterwmg.com)

**This brochure supplement provides information about the following  
Financial Adviser(s):**

**Francisco Fernández Rivera**  
**Javier Reyes**

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## **Francisco Fernández Rivera**

### 2. Educational Background and Business Experience

Mr. Francisco Fernández Rivera 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 also 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 President of the following companies, which are not investment related: Bio-Fats & Oils, Envirosafe Industrial Services Corp. and Plasmatech Caribbean Corp, recycling; CCR Development Group, soda concentrate manufacturing; Digital Technology Media, Focal Point Media and Focal Point Acquisition, Corp., advertising services; FJR Properties, Inc., real estate; Agrocaripe CpreORP, agricultural; and Tropical Aviation Corp. and Aviation Corp, aviation. These businesses involve a significant amount of time, and compensate him, although mainly conducted outside of normal business hours.

## 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 Vice President of Digital Technology Media, an advertising company.

## 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.