

**Part 2A of Form ADV: LIFEINVEST WEALTH MANAGEMENT, LTD Brochure**

Item 1 Cover Page

Brochure for:

**LifeInvest Wealth Management, LTD (a registered investment advisor)**  
**1110 Brickell Ave, Suite 210-A**  
**Miami, Florida 33131**  
**786-523-0500**

<http://www.LifeInvestwealth.com>

Pamela Halk  
Accountant/Consultant

Date of the brochure: February 2,2018

This brochure provides information about the qualifications and business practices of LifeInvest Wealth Management, LTD. (Formally known as EMC Management Consulting, LTD)

If you have any questions about the contents of this brochure, please contact us at (212) -258-2480 and or <http://www.LifeInvestwealth.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 LifeInvest Wealth Management, Ltd. Also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

As a registered investment advisor registration does not imply a certain level of skill or training.

**Item 2 Material Changes**

Name Change: From EMC Managers Consulting, Ltd to LifeInvest Wealth Management, LTD  
Change of principal office address: From 1460 Broadway, New York, NY 10036 TO: 1110 Brickell Ave,  
Suite 210-A, Miami, Florida 33131

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#### Item 4 Advisory Business

##### Advisory Services:

LifeInvest Wealth Management, Ltd (“LifeInvest Wealth Management”) was incorporated on November 14, 2007. LifeInvest Wealth Management is wholly owned by MCE Investment Holding, Inc., a Panamanian entity. MCE is owned 33.33% by Gabriel Osio Zamora, 33.33% by Ernesto Rangel Aguilera and 33.33% by Juan Carlos Carvallo.

LifeInvest Wealth Management’s principal service is providing fee-based investment advisory services. LifeInvest Wealth Management’s primary approach is to use a fundamental allocation strategy aimed at reducing risk and increasing performance. LifeInvest Wealth Management uses exchange listed securities; securities traded over-the-counter, equity securities of foreign issuers, warrants, corporate debt securities, commercial paper, CDs, United States government securities, and options in securities and commodities to accomplish this objective.

LifeInvest Wealth Management may recommend, on occasion, redistributing investment allocations to diversify a client's portfolio in an effort to reduce risk and increase performance. LifeInvest Wealth Management may recommend specific stocks to increase sector weighting and/or dividend potential. LifeInvest Wealth Management may recommend employing cash positions as a possible hedge against market movement which may adversely affect its clients. LifeInvest Wealth Management 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 position(s), change in risk tolerance of client, or any risk deemed unacceptable for the client’s risk tolerance. LifeInvest Wealth Management will provide investment advisory services; however, it will not provide securities execution, custodial and other administrative services. At no time will LifeInvest Wealth Management accept or maintain custody of a client’s funds or securities. LifeInvest Wealth Management manages approximately \$400 million in client assets on a non-discretionary basis.

## Item 5 Fees and Compensation

### Fees:

LifeInvest Wealth Management intends to be compensated for its investment advisory services by charging fees pursuant to the following scenarios:

Scenario 1: As compensation for providing investment advisory services to clients which are referred to LifeInvest Wealth Management by third party brokerages or related persons LifeInvest Wealth Management will be paid by such third party's brokerages or related persons a fixed monthly fee as agreed to in writing between LifeInvest Wealth Management and such third party brokerage or related person. LifeInvest Wealth Management has a contractual arrangement with Life Invest Asset Management (formally known as "LifeInvest Asset Management", formerly known until October 1<sup>st</sup> "ECG Asset Management", a company organized under the laws of Panama which has applied for authority to conduct brokerage activities in Panama and is wholly owned by the owners of LifeInvest Wealth Management. The agreement between LifeInvest Wealth Management and Life Invest Asset Management provides that LifeInvest Wealth Management will receive a fixed monthly payment for providing investment advisory services to clients which Life Invest Asset Management refers to LifeInvest Wealth Management. LifeInvest Wealth Management's affiliate, Life Invest Asset Management entered into commission-sharing arrangements with Julius Baer Bank, Pershing LLC BSI Switzerland ("BSI") and Santander Suisse (formerly HSBC). If a client account is held at BSI, then trading may occur through BSI Switzerland or Life Invest Asset Management. For client accounts held at Santander Suisse, trading occurs directly through Santander Suisse. Through Invest Life Asset Management, LifeInvest Wealth Management receives advisory fees from its affiliate, Invest Life Asset Management, including, without limitation, as a result of client trade executions, including for non-discretionary trades, through Julius Baer, Pershing, BSI. Each advisory client remains free to negotiate brokerage commission rates with Invest Life Asset Management, as introducing broker, and the executing brokers identified in this paragraph. LifeInvest Wealth Management recommends to its clients that trades be executed through Life Invest Asset Management and that Life Asset Management is an affiliate of LifeInvest Wealth Management both orally, when the advisory account is established, and in the written investment advisory agreement we request clients to sign.

Scenario 2: As compensation for providing investment advisory services to clients originated by LifeInvest Wealth Management, clients will pay LifeInvest Wealth Management an annual fee equal to approximately 1% of the assets under management pursuant to a financial advisory contract. (To date there have been no such fees)

Client is responsible for all custodial and securities execution fees charged by the custodian and executing broker-dealer. LifeInvest Wealth Management's fee is separate and distinct from the custodian and execution fees. LifeInvest Wealth Management's clients have the right to use a different broker which is not affiliated with LifeInvest Wealth Management.

Clients may request to terminate their advisory contract with LifeInvest Wealth Management, in whole or in part, by giving thirty (30) days advance written notice. Upon termination, any fees paid in advance will be prorated to the date of termination and any excess will be refunded to client. Client's advisory agreement with LifeInvest Wealth Management is nontransferable without client's written approval.

Item 6      Performance-Based Fees and Side-By-Side Management

None
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Item 7      Types of Clients

**LifeInvest Wealth Management provides investment advisory services to individuals and requires a minimum investment of \$500,000 for new accounts opened at BSI, \$1,000,000.00 at Julius Baer, \$100,000 at Pershing, LLC and \$3 million at Santander Suisse.** LifeInvest Wealth Management will not accept an investor as a client if such investor's investment objectives are inconsistent with the LifeInvest Wealth Management philosophy and investment approach. LifeInvest Wealth Management does not refer to its services as financial planning.

Item 8      Methods of Analysis, Investment Strategies and Risk of Loss

LifeInvest Wealth Management's methods of security analysis include charting and using fundamentals. LifeInvest Wealth Management's sources of information that are referred to for investment advice include research material prepared by outside sources, corporate rating services and annual reports, prospectuses, filings with the Securities and Exchange Commission. LifeInvest Wealth Management's investment strategies used to implement investment advice given to our clients include long term purchases. Investing in securities involves risk of loss that clients should be prepared to bear.



Item 9      Disciplinary Information

None
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Item 10      Other Financial Industry Activities and Affiliations

Affiliations:

LifeInvest Wealth Management, LTD. has the following affiliations as a result of common ownership:

A. MCE Investment Holdings, Inc. (Parent of LifeInvest Wealth Management)

B. ECO Group Advisors

C. Life Invest Asset Management. (formally known as ECG, Broker/dealer organized under the laws of Panama. Formerly known as ECO Group Casa de Valores)

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

LifeInvest Wealth Management complies with The Insider Trading and Securities Fraud Enforcement Act of 1988. LifeInvest Wealth Management monitors the LifeInvest Wealth Management personal securities transactions of all access persons. In addition, LifeInvest Wealth Management has adopted a written Code of Ethics in compliance with SEC Rule 204A-1. This Code is based on the principle that the officers, directors, and employees (or persons having similar status or function) of LifeInvest Wealth Management have a fiduciary duty to place the interests of the clients ahead of their own interests. The Code applies to all supervised persons and focuses principally on monitoring and reporting of personal transactions in securities. Supervised persons must avoid activities, interests and relationships that might interfere with making decisions in the best interests of clients. LifeInvest Wealth Management adheres to the following principles:

- We are fiduciaries. Our duty is at all times to place the interests of our clients first. Supervised persons must avoid putting their own personal interests ahead of the interests of our clients. A supervised person may not induce or cause a client to take action, or not to take action, for personal benefit, rather than for the benefit of the client.
- All personal securities transactions will be conducted in such a manner as to be consistent with the Code of Ethics and to avoid any actual or potential conflict of interest or any abuse of a supervised person's position of trust and responsibility.
- Access persons must regularly submit reports LifeInvest Wealth Management disclosing their beneficial ownership of securities and the acquisition and disposition of such beneficially owned securities. These reports shall detail the (i) title and type of security; (ii) exchange ticker symbol or CUSIP number as applicable; (iii) number of shares; (iv) principal amount of each security; (v) name of any broker, dealer, or bank with which the access person maintains an account in which any securities are held for the access person's direct or indirect benefit; (vi) date that the access person submits the report; (vii) nature of the transaction (i.e., purchase, sale, or other type of acquisition or disposition); (viii) price of the security at which the transaction was affected; (ix) name of the broker, dealer, or bank with or through which the transaction was affected; (ix) name of the broker, dealer, or bank with or through which the transaction was effected; and (x) date the access person submits the report, as applicable.
- All trading by supervised persons must give preference to client portfolios. Specifically, no supervised person may (i) purchase securities for himself or an account over which he has control or a beneficial interest in until all LifeInvest Wealth Management client accounts to which such security has been recommended have acquired all sought positions, or (ii) sell for himself or an account over which he has control or a beneficial interest in until all LifeInvest Wealth Management client accounts for which such security has been recommended to sell have sold such security.
- All supervised persons must; promptly, completely, and truthfully answer client inquiries; maintain the confidentiality of all information that our clients have entrusted to LifeInvest Wealth Management concerning its clients even if they leave LifeInvest Wealth Management; fully comply with all federal laws, rules, and regulations governing the provision of investment advisory services to clients; and promptly report any circumstances which appear to be or could be a violation of this Code to LifeInvest Wealth Management's Chief Compliance Officer.

The Chief Compliance Officer of LifeInvest Wealth Management carries out all compliance-related mandates as set forth by the Code of Ethics. A copy of the firm's Code of Ethics is available upon request by all clients and prospective clients.

Item 12 Brokerage Practices

LifeInvest Wealth Management has a contractual arrangement with Life Invest Asset Management, (formerly known as ECG a company organized under the laws of Panama to conduct brokerage activities in Panama and is wholly owned by the owners of LifeInvest Wealth Management). The agreement between LifeInvest Wealth Management and Life Invest Asset Management provides that LifeInvest Wealth Management will receive a fixed monthly payment for providing investment advisory services to clients which Life Invest Asset Management refers to LifeInvest Wealth Management.

LifeInvest Wealth Management does not provide trade execution services for its advisory clients. Instead LifeInvest Wealth Management recommends, but does not require, that its clients execute their trades for their account(s) through its affiliate, Life Invest Asset Management, which has entered into commission-sharing arrangements with Julius Baer Bank, BSI Switzerland (“BSI”) and Santander Suisse for such referrals. If a client account is held at BSI, then trading may occur through BSI Switzerland or Life Invest Asset Management. For client accounts held at Santander Suisse, trading occurs directly through Santander Suisse. Through Life Invest Asset Management, LifeInvest Wealth Management ultimately receives advisory fees from its affiliate, Life Invest Asset Management, including, without limitation, as a result of client trade executions, including for non-discretionary trades, through Julius Baer Bank, Pershing, LLC, BSI or Santander Suisse. Each advisory client remains free to negotiate brokerage commission rates with Life Invest Asset Management, as introducing broker, and the executing brokers identified in this paragraph. By directing brokerage clients may be unable to achieve most favorable execution of client transactions, and this practice may ultimately cost more money.

Despite these existing arrangements, LifeInvest Wealth Management’s clients have the right to use a different broker for their trade executions; currently, however, none of our advisory clients uses unaffiliated brokerage services. The commission-sharing arrangements by and among Life Invest Asset Management, Julius Bear Bank, BSI and Santander Suisse indirectly benefit LifeInvest Wealth Management, creating a potential conflict of interest when LifeInvest Wealth Management recommends (but does not require) its clients to execute their trades through Life Invest Asset Management. Even though LifeInvest Wealth Management only suggests that its clients open account(s) with its affiliate, LifeInvest Asset Management, LifeInvest Wealth Management will disclose these commission-sharing arrangements to its clients orally when discussing the nature of the services LifeInvest Wealth Management provides and in its investment advisory agreement with each client. LifeInvest Wealth Management believes this disclosure will adequately guide its clients’ decision as to which broker to select for trade execution.

LifeInvest Wealth Management will aggregate orders to purchase a new bond offering by placing a block order with the corresponding financial institution on behalf of the client with client approval.

Item 13      Review of Accounts

LifeInvest Wealth Management reviews the holdings of individual accounts held by it. Client accounts will be reviewed on a quarterly basis though clients may also request a review by LifeInvest Wealth Management of their objectives and holdings on an off-cycle basis. Any development affecting a client's holdings will trigger a review and appropriate advice being given. A continuous day-to-day review will be made of securities held by clients as well as a broad group of other securities in order to determine what changes, if any, should be suggested to clients.

Reviewers:

Monica Calabrese (Senior Vice President of Sales and Chief Compliance Officer) will conduct the quarterly and daily review of client holdings. M. Calabrese will review all of the clients for which reviews are to be conducted and all such reviews will be performed at identical review levels.

Client will receive prompt notification of any investment recommendation made for the Client's Portfolio as well a monthly or quarterly statement (as applicable) showing Client's Portfolio and a review of all transactions occurring during the applicable period.

<p>Item 14 Client Referrals and Other Compensation</p> <p>No client referrals.</p>
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Item 15 Custody

LifeInvest Wealth Management, LTD does not hold client funds or securities.
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Item 16 Investment Discretion

LifeInvest Wealth Management, LTD has non-discretionary accounts



Item 17      Voting Client Securities

None

Item 18 Financial Information

N/A
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Item 19      Requirements for State-Registered Advisers

N/A
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