



**Finaccess Advisors, LLC**  
**Form ADV Part 2A**  
**Investment Adviser Brochure**

This brochure provides information about the qualifications and business practices of Finaccess Advisors, LLC. If you have any questions about the contents of this brochure, please contact Daniel Diaz, Chief Compliance Officer. 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 Finaccess Advisors, LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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August 2012

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## **Item 1: Summary of Material Changes**

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### **Annual Update**

This Item of the brochure is updated if material changes have occurred during the course of Finaccess Advisors, LLC's ("Finaccess Advisors" or the "Adviser") fiscal year; or with the Finaccess Advisors' Annual Updating Amendment (ADV).

### **Material Changes since the Last Update**

Adviser closed its Concord, MA location in July 2012. Upon effecting this change Adviser reduced its total number of investment advisory services, customers and assets under management, while also eliminating conducting advisory activities on a discretionary basis. Adviser currently only offers family office services on a non-discretionary basis. Adviser hired a new Chief Compliance Officer, Daniel Diaz, in July 2012.

### **Full Brochure Available**

Finaccess Advisor will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, Finaccess Advisors' Brochure may be requested by contacting Daniel Diaz, Chief Compliance Officer at (305)377-1112 or [ddiaz@finaccess.com](mailto:ddiaz@finaccess.com).

Additional information about Finaccess Advisors is also available via the Securities Exchange Commission ("SEC") web site [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC's web site also provides information about any persons affiliated with Finaccess Advisors who are registered, or are required to be registered, as investment adviser representatives of Finaccess Advisors.

## **Item 2: Advisory Business**

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### **Firm Description and Types of Advisory Services**

Finaccess Advisors, LLC, ("Finaccess Advisors") is a registered investment advisor formed in 2009 in the state of Delaware and registered to do business in Florida. Finaccess Advisors maintains its primary office in Miami, Florida.

Finaccess Advisors is owned by Finaccess Mexico, S.A. de C.V., Sociedad Operadora de Sociedades de Inversion ("Finaccess Mexico"), a corporation incorporated and existing under the laws of the United Mexican States and licensed by the CNBV in Mexico to operate, manage, and distribute mutual funds, with management fees ranging from 80 to 160 basis points. Clients of Finaccess Mexico are both individuals and corporations.

### **Principal Owners**

Finaccess Inversiones, S.A.P.I. de C.V. owns more than 75 percent of the shares of Finaccess Mexico, S.A. de C.V., Sociedad Operadora de Sociedades de Inversion. Finaccess Mexico, S.A. de C.V., Sociedad Operadora de Sociedades de Inversion ("Finaccess Mexico") is corporation incorporated and existing under the laws of the United Mexican States and licensed by the CNBV in Mexico to operate, manage, and distribute mutual funds, with management fees ranging from 80 to 160 basis points. Clients of Finaccess Mexico are both individuals and corporations. Fideicomiso Irrevocable Trust (Irrevocable Trust) Trust No. F/00728 is the trust that owns Finaccess Inversiones S.A.P.I. de C.V. The Bank of New York Mellon, S.A. Institucion de Banco Multiple is the Trustee for Fideicomiso Irrevocable (Irrevocable Trust) No. F/00728.

### **Types of Advisory Services**

Finaccess Advisors primarily offers family office investment advisory services.

On more than an occasional basis, Finaccess Advisors furnishes advice to clients on matters not involving securities, such as financial planning matters, retirement planning, trust services that often include estate planning and educational services.

Finaccess Advisor provide personalized confidential financial planning, investment management, financial advisory and family office services to individuals, corporations, trusts and charitable organizations worldwide. Advice is provided through consultation with the client and may include: determination of financial objectives, identification of financial problems, cash flow management, insurance review, investment management, education funding, retirement planning, estate planning and educational services.

Investment advice is an integral part of financial planning. In addition, Finaccess Advisors advises clients regarding cash flow, college planning, retirement planning and estate planning.

Finaccess Advisors does not act as a custodian of client assets. The client always maintains asset control.

Finaccess Advisors' Investment Committee reviews all accounts on a monthly basis or at any time based on the request of an account owner and are responsible for recommending investments based on the client's investment planning objectives and risk tolerance.

Other professionals (e.g., lawyers, accountants, insurance agents, etc.) are engaged directly by the client on an as-needed basis. Conflicts of interest are disclosed to the client in the unlikely event they should occur.

### **Types of Agreements**

Advisers following agreements define our typical client relationships:

#### **Investment Advisory Agreement**

Most clients choose to have Finaccess Advisors manage their assets in order to obtain ongoing in-depth advice and life planning. All aspects of the client's financial affairs are reviewed, including those of their dependent children. Realistic and measurable goals are set and objectives to reach those goals are defined. As goals and objectives change over time, suggestions are made and implemented on an ongoing basis.

The scope of work and fees for an Investment Advisory Agreement is provided to the client in writing prior to the start of the relationship. An Investment Advisory Agreement includes: cash flow management; insurance review; investment management (including performance reporting); education planning; retirement planning; estate planning, as well as the implementation of recommendations within each area.

The Investment Advisory service fee is detailed in the Investment Advisory Agreement signed between Finaccess Advisors and the client and is based on a percentage of the average daily value of investable assets under management, a flat fee or as an agreed upon custodian paid referral fee equal to a percent of the sum of all fees charged by the custodian to the Finaccess Advisors client or received by the custodian for services provided to the Finaccess Advisors client. Fees are charged quarterly and paid in arrears.

Although the Investment Advisory Agreement is related to an ongoing service and constant adjustments are required, the length of service to the client is at the client's discretion. The client or Finaccess Advisors may terminate an Agreement by written notice to the other party. At termination, fees will be billed on a pro rata basis for the portion of the quarter completed. The portfolio average daily value at the completion of the prior full billing quarter is used as the basis for the fee computation, adjusted for the number of days during the billing quarter prior to termination.

#### **Family Office Services Agreement**

A Family Office Services Agreement may be executed between Finaccess Advisors and a client when the client is interested in Finaccess Advisors providing the construction and monitoring of individual and consolidated portfolios for family members, assisting in analyzing private equity holdings and investment opportunities, assisting in estate planning, assisting in the analysis and review with tax counsel of tax issues which may affect family members, and assisting in the monitoring and generation of cash flow reports.

The scope of services to be provided under a Family Office Services Agreement is provided to the client in writing prior to the start of the relationship. The Family Office Services fee is detailed in the Family Office Services Agreement signed between Finaccess Advisors and the client and is based on a flat fee. Fees are charged quarterly and paid in arrears. Fees are negotiable in advance of signing any Family Office Services Agreements with Finaccess Advisors and may be based on the types of services to be provided.

The client or Finaccess Advisors may terminate a Family Office Services Agreement by written notice to the other party. At termination, fees will be billed on a pro rata basis for the portion of the quarter completed.

### **Tailored Relationships**

Our advisory services are individually tailored to the specific needs, goals and objectives for each client. Clients may impose restrictions on investing in certain securities or types of securities.

Agreements may not be assigned without client consent.

### **Wrap Fee Programs**

Finaccess does not participate in a Wrap Fee Program.

### **Client Assets**

As of June 30, 2012, Finaccess Advisers manages approximately \$1,631 billion in assets on a non-discretionary basis. Adviser does not manage any assets on a discretionary basis.

### **Item 3: Fees and Compensation**

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#### **Compensation**

Finaccess Advisors' Investment Advisory and Family Office service fees are based on a percentage of the average daily value of investable assets under management, a flat fee or as an agreed upon custodian paid fee equal to a percent of the sum of all fees charged by the custodian to the Finaccess Advisors client or received by the custodian for services provided to the Finaccess Advisors client.

#### **Fee Billing**

Fees for Investment Advisory Services and Family Office services are not directly charge by Finaccess. Services fees are debit directly by the authorized custodian and are based on a percentage of the average daily value of investable assets under management. Finaccess receives a flat fee or as an agreed upon custodian paid fee equal to a percent of the sum of all fees charged by the custodian to the Finaccess Advisors client or received by the custodian for services provided to the Finaccess Advisors client.

#### **Calculation and Payment**

The specific manner in which fees are charged by Finaccess Advisors is established in a Referral Fee Agreement signed between Finaccess Advisors, its clients and the authorized custodian. A copy of this agreement was disclosed in writing to each client following the execution of the agreement. The authorized custodian provides Finaccess on quarterly basis a report of all Referral Fee's (which are comprised of custody fee's, advisory fees and Custodian Discretionary Management Account service fee) due under the Agreement, and remits payment within thirty (30) days from the last day of the previous calendar quarter. All Referral fees may be prorated for each capital contribution and withdrawal made during the applicable calendar quarter. Accounts initiated or terminated during a calendar quarter will be charged a prorated fee.

#### **Termination of Agreement**

A client may terminate any of the aforementioned agreements at any time by notifying Finaccess Advisors in writing and paying the agreed upon fee detailed in the particular agreement signed between Finaccess Advisors and the client. At termination, Investment Advisory Service and Family Office Service fees will be billed on a pro rata basis for the portion of the quarter completed.

Finaccess Advisors may terminate any of the aforementioned agreements at any time by notifying the client in writing. At termination, Investment Advisory Service and Family Office Service fees will be billed on a pro rata basis for the portion of the quarter completed.

Finaccess Advisors reserves the right to terminate any engagement where a client has willfully concealed or has refused to provide pertinent information about financial situations when

necessary and appropriate, in Finaccess Advisor's judgment, to providing proper financial advice.

### **Other Compensation**

Neither Finaccess Advisors nor any of its supervised persons (employees) accept compensation for the sale of securities or other investment products.

### **General Information on Compensation and Other Fees**

Finaccess Advisors' fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, third party investment and other third parties such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus.

Such charges, fees and commissions are exclusive of and in addition to Finaccess Advisors' fee.

All fees paid to Finaccess Advisors for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and variable annuity sub-accounts to their shareholders. These fees and expenses are described in each fund's or sub account's prospectus. These fees will generally include a management fee, other expenses, and a possible distribution fee. If the fund also imposes sales charges, a client may pay an initial or deferred sales charge. A client could invest in a mutual fund or sub-account directly, without the services of Finaccess Advisors. In that case, the client would not receive the services provided by Finaccess Advisors which are designed, among other things, to assist the client in determining which mutual funds or sub-accounts are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the funds/sub-accounts and the fees charged by Finaccess Advisors to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

Clients should note that similar advisory services may (or may not) be available from other registered investment advisers for similar, lower or higher fees.



## **Item 4: Performance-Based Fees and Side-by-Side Management**

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### **Performance-Based Fees**

Neither Finaccess Advisors nor any of its Supervised Persons (employees) accepts performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

Finaccess Advisors does not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for the Adviser to recommend an investment that may carry a higher degree of risk to the client.

## **Item 5: Types of Clients**

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### **Types of Clients**

As described in Item 3, Finaccess Advisors provides investment advice to individuals, trusts and charitable organizations worldwide.

Client relationships vary in scope and length of service.

### **Account Minimums**

Finaccess Advisors does not provide investment advisory services and family offices services that require a minimum dollar value of assets under management.

## **Item 6: Methods of Analysis, Investment Strategies and Risk of Loss**

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### **Methods of Analysis**

Finaccess Advisors may employ the following security analysis methods: Fundamental analysis; charting/technical analysis; and cyclical analysis.

### **Methods of Analysis**

Finaccess Advisor uses the following methods of analysis in formulating its investment advice and/or managing client assets:

***Fundamental Analysis.*** Finaccess Advisor attempt to measure the intrinsic value of a security by looking at economic and financial factors (including the overall economy, industry conditions, and the financial condition and management of the company itself) to determine if the company is underpriced (indicating it may be a good time to buy) or overpriced (indicating it may be time to sell).

Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock.

***Charting/Technical Analysis.*** The terms “charting” and “technical” analysis are generally used synonymously and therefore, for the purpose of this document, the term, “technical analysis” will be used. Finaccess Advisor analyze past market movements and apply that analysis to the present in an attempt to recognize recurring patterns of investor behavior and potentially predict future price movement.

Technical analysis does not consider the underlying financial condition of a company. This presents a risk in that a poorly-managed or financially unsound company may underperform regardless of market movement.

***Cyclical Analysis.*** In this type of technical analysis, we measure the movements of a particular stock against the overall market in an attempt to predict the price movement of the security.

### **Investment Strategies**

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time.

Other strategies may include long-term purchases, short-term purchases and trading.

### **Risk of Loss**

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.

- Market Risk: The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- Inflation Risk: When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- Currency Risk: Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- Reinvestment Risk: This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- Business Risk: These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- Liquidity Risk: Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- Financial Risk: Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

## **Item 7: Disciplinary Information**

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Adviser and its employees have not been involved in legal or disciplinary events related to past or present investment clients.

## **Item 8: Other Financial Industry Activities and Affiliations**

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### **Financial Industry Activities**

Finaccess Advisors is not registered as a broker-dealer, and none of its management persons are registered representatives of a broker-dealer.

Neither Finaccess Advisors nor any of its management persons is registered as (or associated with) a futures commissions merchant, commodity pool operator, or a commodity trading advisor.

### **Financial Industry Affiliations**

Finaccess Advisors is owned by Finaccess Mexico, S.A. de C.V., Sociedad Operadora de Sociedades de Inversion ("Finaccess Mexico"), a corporation incorporated and existing under the laws of the United Mexican States and licensed by the CNBV (National Banking and Securities Commission) in Mexico to operate, manage, and distribute mutual funds. Clients of Finaccess Mexico are both individuals, for profit and non-profit corporations and government entities. There is no conflict between any of Finaccess Advisors' clients and Finaccess Mexico's client.

Potential conflicts of interest are disclosed to the client in the unlikely event they should arise.

### **Other Investment Advisors**

While Finaccess Advisors may recommend or select other investment advisors for its clients, Finaccess Advisors does not receive any compensation in the event such recommendations are provided.

## **Item 9: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

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### **Code of Ethics**

Finaccess Advisors employees must comply with a Code of Ethics and Statement for Insider Trading. The Code describes Advisers' high standard of business conduct, and fiduciary duty to its clients. The Code's key provisions include:

- Statement of General Principles;
- Policy on and reporting of Personal Securities Transactions;
- A prohibition on Insider Trading;
- Restrictions on the acceptance of significant gifts;
- Procedures to detect and deter misconduct and violations; and
- Requirement to maintain confidentiality of client information.

Daniel Diaz, Chief Compliance Officer reviews all employee trades at least on a quarterly basis.

Finaccess Advisors' employees must acknowledge the terms of the Code of Ethics at least annually. Any individual not in compliance with the Code of Ethics may be subject to termination.

Clients and prospective clients can obtain a copy of Finaccess Advisors' Code of Ethics by contacting Daniel Diaz at (305) 377-1112.

### **Participation or Interest in Client Transactions – Personal Securities Transactions**

Finaccess Advisors and its employees may buy or sell securities identical to those recommended to clients for their personal accounts. The Code of Ethics, described above, is designed to assure that the personal securities transactions, activities and interests of the employees of Finaccess Advisors will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code certain classes of securities, primarily mutual funds, have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of Finaccess Advisors' clients. In addition, the Code requires pre-clearance of many transactions. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics, and designed to reasonably prevent conflicts of interest between Finaccess Advisors and its clients.

### **Participation or Interest in Client Transactions – Financial Interest and Principal/Agency Cross**

Finaccess Advisors and its employees do not recommend to clients, or buy or sell for client accounts, securities in which they have a material financial interest.

It is Finaccess Advisors' policy that Adviser will not affect any principal or agency cross securities transactions for client accounts. Finaccess Advisors will also not cross trades between client accounts.

**Participation or Interest in Client Transactions – Aggregation**

Finaccess Advisors and its employees may trade in the same securities with client accounts on an aggregated basis when consistent with Finaccess Advisors' obligation of best execution. In such circumstances, the affiliated and client accounts will share commission costs equally and receive securities at a total average price. Finaccess Advisors will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. Completed orders will be allocated as specified in the initial trade order. Partially filled orders will be allocated on a pro rata basis. Any exceptions will be explained on the order.



## **Item 10: Brokerage Practices**

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### **Research and Other Soft Dollar Benefits**

Finaccess Advisors does not receive formal soft dollar benefits other than execution from broker/dealers in connection with client securities transactions. See disclosure below in “Directed Brokerage – Other Economic Benefits”.

### **Brokerage for Client Referrals**

Finaccess Advisors does not receive client referrals from other broker-dealers or investment advisors.

### **Directed Brokerage**

Finaccess Advisors does not have any affiliation with product sales firms. Specific custodian recommendations are made to clients based on their need for such services. Finaccess Advisors recommends custodians based on the proven integrity and financial responsibility of the firm and the best execution of orders at reasonable commission rates.

Finaccess Advisors does not receive fees or commissions from any of these arrangements.

### **Best Execution**

Finaccess Advisors in seeking to obtain the best execution of portfolio transactions. The Adviser may consider the quality and reliability of brokerage services, as well as research and investment information and other services provided by brokers and dealers. Factors considered by Finaccess Advisors in selecting brokers and dealers may include the following: price, the broker's or dealer's facilities, reliability and financial responsibility; the ability of the broker or dealer to effect securities transactions, particularly with regard to such aspects as complexity of the trade, timing, order size and execution of orders; and the research and other services provided by that broker or dealer to Finaccess Advisors that are expected to enhance our general portfolio manager capabilities, notwithstanding that a client may not be the direct or exclusive beneficiary of such services. Commission rates, being a component of price, are one factor considered together with other factors. Accordingly, Finaccess Advisors in its discretion, may cause a client to pay a commission for effecting a transaction that may be in excess of the amount another broker would have charged for effecting that same transaction and this may be done where we have determined in good faith that the commission is reasonable in relation to the value of the brokerage and/or research services provided by the broker or dealer to our client(s).

The commissions paid by Finaccess Advisors' clients shall comply with Finaccess Advisors' duty to obtain “best execution.” However, a client may pay a commission that is higher than another qualified broker-dealer might charge to effect the same transaction where Finaccess Advisors determines, in good faith, that the commission is reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealers service, including among others, the value of research provided, execution capability, commission rates, and responsiveness. Consistent with the foregoing, while Finaccess Advisors will seek competitive rates, it may not necessarily obtain the lowest possible commission rates for client transactions.

### **Trade Aggregation**

Finaccess Advisors does not aggregate or block trades.

## **Item 11: Review of Accounts**

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### **Reviews**

Finaccess Advisors' Investment Committee reviews all accounts on a monthly basis, more frequently when market conditions dictate or at any time upon request of the client. Finaccess Advisors' Investment Committee is responsible for recommending investments based on a client's investment planning objectives and risk tolerance. There are three (3) members of Finaccess Advisors' Investment Committee: Javier Lopez Casado, Alex Camargo and Daniel Diaz.

Other conditions that may trigger a review are changes in market, political or economic conditions, tax laws, new investment information, and changes in a client's own situation.

Account reviewers are members of Adviser's Investment Committee. They are instructed to consider the client's current security positions and the likelihood that the performance of each security will contribute to the investment objectives of the client.

### **Reporting**

Clients receive periodic communications on at least an annual basis. Investment Advisory Agreement clients receive quarterly portfolio reviews and may request an additional portfolio review at any time.

## **Item 12: Client Referrals and Other Compensation**

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### **Other Compensation**

Finaccess Advisors does not receive any economic benefits (other than normal compensation and benefits described in Item 10) from any firm or individual for providing investment advice.

## **Item 13: Custody**

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### **Custody – Fee Debiting**

Client investment assets will be held with a custodian agreed upon by the client and Finaccess Advisors. The custodian is advised in writing of the limitation of Finaccess Advisors' access to the account. The custodian sends a statement to the client, at least quarterly, indicating all amounts disbursed from the account including the amount of advisory fees paid directly to Finaccess Advisors.

### **Custody – Account Statements**

As described above, clients receive at least quarterly statements from the broker-dealer, bank or other qualified custodian that holds and maintains client's investment assets. All assets are held at qualified custodians and the custodians provide monthly account statements directly to clients at their address of record, by secure email or with password protected online access. At the discretion of the client, Finaccess Advisors is provided with copies of monthly statements or given password protected online access to statements. Finaccess also utilizes account aggregation software to access the daily activity and performance of many of its clients. The availability of a client's daily activity and performance is dependent upon the client's custodian and the availability of a data feed to the account aggregation entity utilized by Finaccess Advisors.

Clients are urged to carefully review such statements and compare such official custodial records to the reports that Finaccess Advisors provides. Finaccess Advisors reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

## **Item 14: Investment Discretion**

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Finaccess Advisors only provides investment advisory services on a non-discretionary basis with its clients.

For non-discretionary Investment Advisory Agreements the Adviser makes recommendations to the client and, if client decides to accept such recommendations, client will directly execute the recommendations via signed written instruction provided to the custodian.

In all client relationship, the client approves the custodian to be used and the commission rates paid to the custodian.

## **Item 15: Voting Client Securities**

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Finaccess Advisors does not have any authority to and does not vote proxies on behalf of clients. Clients retain the responsibility for receiving and voting proxies for securities maintained in their portfolios; clients receive these proxies directly from either custodians or transfer agents.

If requested, Finaccess Advisors may provide advice to clients regarding proxy votes. If any conflict of interest exists, it will be disclosed to the client. Clients may contact Daniel Diaz at (305) 377-1112 for information about proxy voting.

## **Item 16: Financial Information**

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Finaccess Advisors 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.

Finaccess Advisors does not require prepayment of fees of both more than \$1,200 per client, and more than six months in advance; and therefore is not required to provide a balance sheet to clients.



**Finaccess Advisors, LLC**  
**Form ADV Part 2B**  
**Investment Adviser Brochure Supplement**

**Supervisor: Daniel Diaz**

**Supervisor of:**

**Javier Lopez Casado**  
**Alexandre Camargo**

**August 2012**

This brochure supplement provides information about Adviser's Supervised Persons that supplements the Finaccess Advisors, LLC's brochure. You should have received a copy of that brochure. Please contact Daniel Diaz, Chief Compliance Officer if you did not receive Finaccess Advisors, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Adviser's Supervised Persons is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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[ddiaz@finaccess.com](mailto:ddiaz@finaccess.com)

## **Educational Background and Business Experience**

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### **Education and Business Background**

Finaccess Advisors requires that advisors in its employ have a bachelor's degree and further coursework demonstrating knowledge of financial planning. Examples of acceptable coursework include: an MBA, a CFP®, a CFA, a ChFC, JD, CTFA, EA or CPA. Additionally, advisors must have work experience that demonstrates their aptitude for financial planning and investment management.

### **Supervised Persons**

**Daniel Eduardo Diaz**

**Born: 1977**

#### **Education:**

Florida International University, Bachelor of Business Administration with a Major in Finance

#### **Professional Background:**

2002-2004: Accounts Payable, MCM Corporation  
2004-2005: Operations Analyst, BankBoston International  
2005-2006: Assistant Relationship Manager, BankBoston International  
2006-2010: Private Banking Officer, Banco Santander Int'l Miami  
2010-2012: Assistant Vice President, Banco Santander Int'l Miami  
2012-Present: Chief Compliance Officer, Finaccess Advisors, LLC.  
Investment Committee, Finaccess Advisors, LLC.

**Javier Lopez Casado**

**Born: 1968**

#### **Education:**

J.D., Universidad Complutense de Madrid  
LLM Legal and Tax Advisory for Corporations, Univ. Politécnica de Madrid  
M.B.A. University of Miami

#### **Current Licenses:**

Series 65

#### **Professional Background:**

1992-1994: Jr. Lawyer, Bufete de Abogados Hernández-Canut  
1995-1996: Lawyer, Bufete Iberoamericano de Negocios  
1996-1997: Private Banking Officer Latin America, Banco Santander  
1997-1999: Asst. V.P. Priv. Banking Latin America, Banco Santander Central Hispano Int'l.

1999-2003:	V.P. Private Banking Family Office, Banco Santander Central Hispano Int'l.
2003-2008:	Sr. Banker Family Office, Grupo Santander - Santander Private Banking
2008-2010:	Sr. V.P. Private Wealth Banco Santander Int'l-Miami
2010-2012:	Managing Director, Finaccess Advisors, LLC. Investment Committee, Finaccess Advisors, LLC.
2012-Present:	Chief Executive Officer, Finaccess Advisors, LLC. Investment Committee, Finaccess Advisors, LLC.

**Alexandre de Arruda Camargo e Ribeiro da Silva**

**Born: 1977**

Education:

Suffolk University, Bachelor of Business Administration with a Major in Finance  
CFA Level II Candidate

Current Licenses:

Series 65

Licenses Previously Held:

Series 63

Series 7

Professional Background:

1999-2000:	Floor Walker, Fidelity Investment
2000-2001:	Registered Representative, First Investor's Corporation
2001-2006:	Senior Banker & Partner, The Funding Group Boston
2006-2007:	Investment Product Specialist II, BankBoston International
2007-2010:	Fixed Income/Equity Trader, Banco Santander International
2010-2012:	Investor, JP Morgan Chase & Co
2012-Present:	Portfolio Manager, Finaccess Advisors LLC Investment Committee, Finaccess Advisors, LLC.

## **Disciplinary Information**

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Neither Finaccess Advisors nor any Supervised Persons have been involved in any activities resulting in a disciplinary disclosure.

## **Other Business Activities**

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Disclosures on Outside Business Activities are provided in Form ADV Part 2A Item 8 – Other Financial Industry Activities and Affiliations above. The Adviser does not have any associated persons that maintain any outside Business Activities at this time; as such no material conflict of interest with clients exists.

As disclosed in Form ADV Part 2A Item 3 – Fees and Compensation, neither Finaccess Advisors nor any Supervised Persons receive commissions, bonuses or other compensation based on the sale of securities or other investment products.

## **Additional Compensation**

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No Supervised Person receives any economic benefit outside of regular salaries or bonuses related to amount of sales, client referrals or new accounts.

## **Supervision**

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Daniel Diaz, Chief Compliance Officer, supervises all persons named in this Form ADV Part 2B Investment Adviser Brochure Supplement. Daniel Diaz supervises these persons by holding regular staff, investment and other ad hoc meetings. In addition, Daniel Diaz regularly reviews client reports, emails, and trading, as well as employees' personal securities transaction and holdings reports. Daniel Diaz may be reached at (305)377-1112.