

## **Item 1 – Cover Page**

# **Interamericas Advisor Solutions, Inc.**

**401 East Main, Suite 407  
El Paso, TX 79901**

**858-692-8202**

**April 21, 2020**

This Brochure provides information about the qualifications and business practices of Interamericas Advisor Solutions, Inc. (“Interamericas Advisor Solutions”, “firm”, “we” and “our”). When we use the words “you”, “your” and “client” we are referring to you as our client or our prospective client. If you have any questions about the contents of this Brochure, please contact us at 858-692-8202, or via email at [intamadvisors@gmail.com](mailto:intamadvisors@gmail.com). The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority.

Interamericas Advisor Solutions 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 are intended to provide you with information about which you determine to hire or retain an Adviser.

Additional information about Interamericas Advisor Solutions is also available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Item 2 – Material Changes**

Please note that there have not been material changes made to our brochure since the last delivery and or posting of our ADV.

In the future we will provide new clients with a Brochure before or at the time we enter into an advisory agreement. In the future, we will deliver to our clients, within 120 days of the end of each fiscal year, a free, updated Brochure that either includes or is accompanied by a summary of material changes. Alternatively, we may deliver a summary of material changes that includes an offer to provide a copy of the updated Brochure and information on how our clients may obtain the Brochure.

Currently, our Brochure may be requested, free of charge, by contacting Myrna Chavira, President at [intamadvisors@gmail.com](mailto:intamadvisors@gmail.com) or 858-692-8202.

Additional information about Interamericas Advisor Solutions is also available via the SEC's web site which can be accessed at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC's web site also provides information about any persons affiliated with Interamericas Advisor Solutions who are registered, or are required to be registered, as investment adviser representatives of Interamericas Advisor Solutions.

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## **Item 4 – Advisory Business**

### **Ownership**

Interamericas Advisor Solutions is wholly owned by Aleso, Inc., a corporation that is wholly owned by Myrna Chavira.

### **Assets under Management**

Interamericas Advisor Solutions does not currently have any assets under management.

### **Services**

Interamericas Advisor Solutions provides investment advice and portfolio management services on a continuing basis - including an appropriate allocation of managed assets among cash money market funds, equity, and bonds - with the selection of specific securities, which will provide proper diversification and help meet the client's stated investment objectives.

These services include the evaluation, design, construction, implementation, and monitoring of investment portfolios. Assets are allocated among appropriate investment categories in accordance with the client's financial objectives, liquidity constraints, expected time horizon, risk tolerance, and tax considerations as well as prevailing economic conditions and any other relevant factors. Existing assets are evaluated and appropriate hold or sell recommendations are made. Clients may impose restrictions on investing in certain securities or types/classes of securities.

Interamericas Advisor Solutions maintains a Limited Power of Attorney and/or Trading Authority for all discretionary accounts for the purposes of directing and/or otherwise effecting investments on behalf of the managed account as well as for the direct payment of Interamericas Advisor Solutions' fees and/or payment of commissions, custodial fees and/or other charges incurred by the managed account.

## **Item 5 – Fees and Compensation**

Fees for ongoing portfolio monitoring are generated based on annualized percentage range of 0.25% to 2.0% of portfolio assets. Fees are calculated and assessed on a quarterly basis by multiplying the assets under management by the applicable percent and dividing such product by four (4). The extent of monitoring services and all fees are agreed upon in writing prior to engagement. Monitoring fees are payable quarterly, 20 days into the quarter; and such fees will be deducted from a client's account(s) or billed to the client at their request. All fees may be negotiable under certain circumstances. Monitoring services may be terminated by either party at any time and for any reason. Any unearned fees are refunded on a pro-rata basis less reasonable startup costs.

Investment portfolios are monitored and re-evaluated on a regular basis. Asset allocation is maintained through re-balancing or adjusted as needed based on changes in client's objectives or prevailing economic conditions. Recommendations are made for placement of new funds as they become available. Clients may also be charged custodial service fees and transactional fees imposed by regulatory authorities; as well as brokerage costs, which are explained in Item 12 – Brokerage Practices.

Investment Advisor representatives may also receive compensation from purchase and sale of securities and other investment products, including asset-based sales charges or service fees from the sales of investment company products in certain circumstances. Please note that while the advisor may rely on the broker dealer for best execution in terms of price, for securities that may involve an ongoing expense ratio,

the advisor has an obligation to choose the most cost effective product that still meets the client needs, i.e. the most favorable terms reasonably available under the circumstances.

The relationship between the parties may be terminated by either party upon 30 days written notice. Notwithstanding the above, if the appropriate disclosure statement was not delivered to the client at least 48 hours prior to the client entering into any written or oral advisory contract with this investment adviser, then the client has the right to terminate the contract, without a penalty, within five (5) business days after entering into the contract.

### **General Program Disclosure**

Additional information regarding these advisory arrangements will be disclosed by Interamericas Advisor Solutions in the client agreement and by delivery of the Form ADV Part 2A for Interamericas Advisor Solutions and the Disclosure Document for the respective Portfolio Manager. The factors that can bear upon the relative cost of the service or program include the cost of the services if provided separately, the trading activity in the client's account which results from client investment objectives and type of securities that are invested in.

### **Minimum Account Balance**

If the client account value falls below the minimum account balance required by a specific Portfolio Manager, Interamericas Advisor Solutions and such Portfolio Manager shall have the right to terminate the Offshore Client Account.

## **Item 6 – Performance-Based Fees and Side-By-Side Management**

Interamericas Advisor Solutions does not charge performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client) or engage in side by side management.

## **Item 7 – Types of Clients**

Interamericas Advisor Solutions may provide portfolio management services to individuals, high net worth individuals, trusts, corporate pension and profit-sharing plans, Taft-Hartley plans, private investment funds, trust programs, other institutions and other Investment Advisors.

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

### **Risk of Loss**

All investment programs have certain risks that are borne by the investor. Investing in securities involves risk of loss that clients should be prepared to bear. Questions regarding risks may be directed to the firm.

### **Analysis**

Interamericas Advisor Solutions may use Charting, as well Fundamental, Technical and Cyclical analysis. Investment decisions take into consideration how a particular security will affect the overall portfolio. We assess its potential for growth and/or income, the security's impact on overall portfolio risk, and possible tax consequences. Factors that may be considered when making investment decisions include, but are not limited to (listed in alphabetical order):

- Ability to Communicate with Management
- Analyst Forecast

- Balance of Company Leverage & Liquidity
- Beta
- Business Mix
- Cash Flow
- Dividend Policy (Payout/Growth)
- Dividends
- Earnings Consistency & Quality
- Economic Considerations
- Economic MOAT
- EPS
- Historic Business Results & Growth
- Industry Outlook
- Industry/Sector
- Insider & Large Holders Transactions
- Institutional Ownership
- Investment Timeframe
- Local vs. Global
- Management Quality
- Market Liquidity & Capitalization
- Market Price vs. Fair Value
- Market Share of Products/Services
- Options & Premiums
- P/E Ratio
- P/E to Growth
- Profitable Margin Growth
- Return on Equity
- Return on Sales
- Return on Assets
- Sector vs. Current Holdings
- Suitability
- Tax Considerations
- Technical & Psychological Considerations
- Time of Year

### **Interamericas Advisor Solutions Guidelines of Investing:**

Interamericas Advisor Solutions generally conforms to the following guidelines with respect to its investment methodology:

- Buy and hold good stocks and quality bonds
- Use options to mitigate risk and produce income
- Perform research to uncover hidden opportunities
- Analyze and discern the “big picture”
- Assess each investment’s potential for growth and/or income, overall impact on portfolio risk, and possible tax consequences
- Research Continuity and commitment to our strategy
- Maintain a long-term perspective
- Keep costs among the lowest and provide best-in-class wealth management services

## **Item 9 – Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Interamericas Advisor Solutions or the integrity of Interamericas Advisor Solutions’ management. Interamericas Advisor Solutions has no information applicable to this Item.

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

### **Broker Dealer - Insight Securities, Inc.**

Myrna is the CEO of Insight Securities, Inc. (“Insight”), a broker/dealer registered with the SEC and various state jurisdictions and a member firm of the Financial Industry Regulatory Authority (“FINRA”). Notwithstanding the above, clients have the option to designate their broker-dealer.

### **Insurance – Precise Insurance**

Myrna Chavira is the Vice President of Precise Insurance Group. Advisory clients are not obligated to use Precise Insurance Group as their insurance agency or agent or to use any recommended insurance company for any recommended insurance transaction. To the extent insurance products are offered to advisory clients of Interamericas Advisor Solutions, the supervised persons will be indirectly paid (salary) by the insurance company in the basic course of business. This creates a conflict of interest as there is an incentive for them to recommend insurance products based on the compensation received, rather than on the client’s needs. Notwithstanding such conflict of interest, Interamericas Advisor Solutions addresses its fiduciary duty by utilizing insurance products only where it is the best interest of clients, and after consultation with the client and no advisory fees are charged on insurance products. *See Item 12 - Brokerage Practices and Item 14 - Client Referrals and Other Compensation* for a discussion of the conflict so interest and compensation related to these relationships. The amount of time spent on these activities is no more than (2) two percent of her time.

## **Item 11 – Code of Ethics**

Interamericas Advisor Solutions has adopted a Code of Ethics to ensure that securities transactions by Interamericas Advisor Solutions employees are consistent with Interamericas Advisor Solutions’ fiduciary duty to its clients and to ensure compliance with legal and regulatory requirements and the firms standards of business conduct.

The principals and employees of the firm are permitted to invest in the same securities that the firm

recommends to clients. They may recommend to clients or may buy and sell securities for client accounts at or about the same time that they buy or sell in their own account. This creates a conflict of interest because the principals and employees of the firm may have an incentive to execute their orders in front of client orders. To mitigate this conflict, employees are not permitted to enter buy or sell orders in the same or similar securities contemporaneously with client orders.

Interamericas Advisor Solutions requires transaction confirmation and quarterly reporting for all registered representatives who provide investment advisory services to clients of Interamericas Advisor Solutions. A written copy of Interamericas Advisor Solutions' Code of Ethics is available upon request, free of charge.

## **Item 12 – Brokerage Practices**

Interamericas Advisor Solutions will supervise and direct the investments of the client accounts subject to such limitations as the client may impose in writing. Interamericas Advisor Solutions, as agent and attorney-in-fact with respect to the client's account, without prior consultation with the client, may place orders for the execution of such securities transactions with Interamericas Advisor Solutions or other third-party broker/dealers. Interamericas Advisor Solutions will allocate brokerage transactions in a manner it believes to be fair and responsible to its clients, and consistent with client objectives. Adhering to a strict formula will not be practicable given the variation in client objectives and guidelines.

We may place all or a portion of the transactions with a broker with whom the client has a special advisory or consulting relationship. Such transactions are placed with a broker who may have provided manager selection services, performance measurement services, asset allocation services, or a variety of other consulting or monitoring assistance, all with the specific knowledge and full approval of the client.

We do not maintain agreements with referring brokers regarding our internal allocation of brokerage transactions. However, all or a sizable portion of a particular clients' brokerage transaction business may be directed to a particular broker if the client has directed, agreed or stipulated us to do so. Commissions are not intended to compensate brokers for client referrals.

With regard to client directed brokerage, we are required to disclose that we may be unable to negotiate commissions, block or batch client orders or otherwise achieve the benefits described above, including best execution, if you limit our brokerage discretion. Directed brokerage commission rates may be higher than the rates we might pay for transactions in non-directed accounts. Also, clients that restrict our brokerage discretion may be disadvantaged in obtaining allocations of new issues of securities that we purchase or recommend for purchase in other clients' accounts. It is our policy that such accounts do not participate in allocations of new issues of securities obtained through brokers and dealers other than those designated by the client. As a general rule, we encourage each client to compare the possible costs or disadvantages of directed brokerage against the value of the custodial or other services provided by the broker to the client in exchange for the directed broker designation.

## **Item 13 – Review of Accounts**

Interamericas Advisor Solutions, Inc., as investment advisor, reviews all investment advisory accounts. Changes in market prices, interest rates, news stories, earning reports, etc., that are deemed to have an effect on a client account would initiate a review of the account. All investment advisory accounts are reviewed on a regular basis by Myrna Chavira, President and Chief Compliance Officer.



Clients receive statements from the custodian of assets at least quarterly, or monthly, if there is activity in the account. (*See Item 15 on Custody*) Clients may give written request to receive their statements and trade confirmations electronically from the custodian.

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

### **Brokerage Compensation**

#### ***Mutual Funds Charges***

When recommending investments in mutual funds, it is our policy to review and consider available share classes. The Firm's policy is to select the most appropriate share classes based on various factors including but not limited to; minimum investment requirements, trading restrictions, internal expense structure, transaction charges, availability and other factors. When considering all the appropriate factors we attempt to select a share class that is the 'lowest cost' share class in order to address our duty to obtain best execution. However, in order to select the most appropriate share class, the Interamericas Advisor Solutions may select retail, institutional or other structured share classes when appropriate that have a higher cost. Institutional share class mutual funds typically have lower cost than other share classes and generally do not have an associated 12b-1 fee, leading to a lower overall expense ratio than share class A, B, or C shares of the same mutual fund. To the extent mutual funds are utilized as third-party managers, fees from the issuers of such mutual funds will be in addition to the consulting fee paid herein. The client is advised that, in addition to the annual advisory fee, each mutual fund in which assets are invested will incur separate investment advisory fees and other expenses for which client will bear a proportionate share.

#### **Cash and Money Market Funds**

If an investment advisory client utilizes Insight as the broker-dealer, Interamericas' selection of money market mutual funds, or comparable investments in which to hold cash reserves in the client's account is limited to certain investments. The selection includes money-market, municipal money-market and government money-market funds, and the issuers of funds pay Insight a distribution fee in its capacity as a broker-dealer. This compensation is in addition to other fees, etc. received from client accounts. Additionally, cash balances arising from the sales of securities, redemption of debt securities, dividend and interest payments and funds received from clients are so invested automatically on a daily basis. When securities are sold, funds are deposited on the first business day after settlement date. Funds placed in a client's account by personal check usually will not be invested until the second business day following the day that the deposit is credited to the client's account. Due to the foregoing practices, Insight may obtain federal funds prior to the date that deposits are credited to client accounts and thus may realize some economic benefit because of the delay in investing these funds. Where an unaffiliated broker-dealer or other entity acts as custodian of the client's account assets, Interamericas Advisor Solutions has no control over the manner in which the cash reserves will be handled. The client and/or custodian will make that determination. This compensation is historically minimal in relation to all other compensation earned by Interamericas Advisor Solutions.

Interamericas Advisor Solutions does not have any arrangements, oral or in writing, where it is paid cash by or receives some economic benefit (including commissions, equipment or non-research services) from a non-client in connection with giving advice to clients.

Interamericas Advisor Solutions does not directly or indirectly compensate any person for client referrals.

## Item 15 – Custody

While Interamericas Advisor Solutions’ attempt to recommend custodians based on anticipated services needed by the client, the final decision to custody assets with a given custodian is at the discretion of the Interamericas Advisor Solutions’ clients, including those accounts under ERISA or IRA rules and regulations, in which case the client is acting as either the plan sponsor or IRA accountholder. Certain custodians may apply fees for custodial services rendered.

Custodians provide Interamericas Advisor Solutions with access to its institutional trading and custody services, which are typically not available to retail investors. These services generally are available to independent investment advisors on an unsolicited basis, at no charge to them so long as a total of at least a pre-determined amount of the advisor’s clients’ assets are maintained in accounts at a Custodian. Each custodian’s services include brokerage services that are related to the execution of securities transactions, custody, research, including that in the form of advice, analyses and reports, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

Custodians are compensated by customers through commissions or other transaction-related or asset-based fees for securities trades that are executed through the custodian or that settle into custodial accounts.

The cost to trade securities varies between custodians; therefore, Interamericas Advisor Solutions may be motivated to recommend the custodian with the lowest trading cost in order to minimize their expenses.

Custodians may also make available to Interamericas Advisor Solutions other products and services that benefit Interamericas Advisor Solutions but may not benefit its clients’ accounts. These benefits may include national, regional or Interamericas Advisor Solutions-specific educational events organized and/or sponsored by the custodian(s). Other potential benefits may include occasional business entertainment of personnel of Interamericas Advisor Solutions by custodian personnel, some of which may accompany educational opportunities. Other of these products and services assist Interamericas Advisor Solutions in managing and administering clients’ accounts. These include software and other technology (and related technological training) that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts), provide research, pricing information and other market data, facilitate payment of Interamericas Advisor Solutions’ fees from its clients’ accounts, and assist with back-office training and support functions, recordkeeping and client reporting. Many of these services generally may be used to service all or some substantial number of Interamericas Advisor Solutions accounts. The Custodians also makes available to Interamericas Advisor Solutions other services intended to help Interamericas Advisor Solutions manage and further develop its business enterprise. These services may include professional compliance, legal and business consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, employee benefits providers, human capital consultants, insurance and marketing. In addition, the custodians may make available, arrange and/or pay vendors for these types of services rendered to Interamericas Advisor Solutions by independent third parties. Custodians may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to Interamericas Advisor Solutions. While, as a fiduciary, Interamericas Advisor Solutions endeavors to act in its clients’ best interests, Interamericas Advisor Solutions’ recommendation that clients maintain their assets in accounts at a certain custodian may be based in part on the benefit to Interamericas Advisor Solutions of the availability of some of the foregoing products and services and other arrangements and not solely on the nature, cost or

quality of custody and brokerage services provided, which may create a potential conflict of interest.

Where a securities transaction occurs in an investment advisory accounts, the respective advisory clients will receive at least one report or statement for that month from their custodian that details transactions, lists all security positions, and realized and unrealized gains or losses. Notwithstanding the above, advisory clients will receive quarterly reports or statements where no securities transactions occurred. These statements enable the client to review and audit the performance of their investment advisory account. Interamericas Advisor Solutions urges you to carefully review your custodial statements.

## **Item 16 – Investment Discretion**

Interamericas Advisor Solutions will supervise and direct the investments of the client accounts subject to such limitations as the client may impose in writing. Interamericas Advisor Solutions, as agent and attorney-in-fact with respect to the client's account, without prior consultation with the client, may, (a) direct the purchase, sell, exchange, conversion, and otherwise trade in stocks, bonds and other securities including money market instruments, (b) direct the amount of securities purchased, sold, exchanged, and otherwise traded.

## **Item 17 – Voting Client Securities**

As a matter of firm policy and practice, Interamericas Advisor Solutions does not have any authority to and does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. Interamericas Advisor Solutions may provide advice to clients regarding the clients' voting of proxies.

## **Item 18 – Financial Information**

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about Interamericas Advisor Solutions' financial condition. Interamericas Advisor Solutions 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. Additionally, we do not require or solicit prepayment of more than \$500 in fees per client, six months or more in advance. Therefore, we have no additional material additional financial disclosures to make.