

Finequities LLC

Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of Finequities LLC. If you have any questions about the contents of this brochure, please contact us at (877) 205-5574 or by email at: santiago@finequities.com/support@finequities.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 Finequities LLC is also available on the SEC's website at www.adviserinfo.sec.gov. Finequities LLC's CRD number is: 305744.

3077 S. Dixie Hwy #204
West Palm Beach, FL 33405
(877) 205-5574
santiago@finequities.com
www.finequities.com

Registration as an investment adviser does not imply a certain level of skill or training.

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Item 2: Material Changes

In this item, Finequities LLC identifies material changes to this brochure since its annual amendment filing of October 12, 2022.

Item 3: Table of Contents

Item 1: Cover Page	
Item 2: Material Changes.....	ii
Item 3: Table of Contents.....	iii
Item 4: Advisory Business	2
Item 5: Self Elected Trading	3
Item 6: Fees and Compensation.....	4
Item 7: Performance-Based Fees and Side-By-Side Management	4
Item 8: Types of Clients	4
Item 9: Methods of Analysis, Investment Strategies, & Risk of Loss	5
Item 10: Disciplinary Information	7
Item 11: Other Financial Industry Activities and Affiliations	7
Item 12: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....	8
Item 13: Brokerage Practices	8
Item 14: Review of Accounts.....	8
Item 15: Client Referrals and Other Compensation.....	9
Item 16: Custody	9
Item 17: Investment Discretion.....	9
Item 18: Voting Client Securities (Proxy Voting)	9
Item 19: Financial Information.....	9

Item 4: Advisory Business

A. Description of the Advisory Firm

Finequities LLC (hereinafter “FIN”) is a limited liability company organized in the state of Florida. The firm became registered as an investment adviser in November 2019 and launched its interactive application to provide investment advisory services in 2021. Its principal owner is Santiago Jimenez de Andrade.

B. Types of Advisory Services

Fin provides social investment platform through its interactive mobile application available on the App Store or other similar online stores. Users can download the app and enjoy investment advisory services along with other social features of the platform.

For the social network part, users chat about strategies, share thoughts and follow other’s portfolios for guidance. It also provides investment advice through custom portfolios based on characteristics input by the client, such as the client’s risk tolerance, income, and current assets, among others.

FIN’s custom portfolio service entails the use of algorithm-based investment advice, rather than in-person investment advice. FIN has designed a proprietary investor profile questionnaire to gather this information. FIN’s recommended custom portfolios are limited to recommendations on purchasing and selling equity securities. FIN does not manage client’s accounts. Clients may open a brokerage account through the application and execute securities transactions if they choose to do so. Clients are responsible for executing transactions in their account as FIN will not have any trading authority over client accounts.

FIN also provides general financial data such as markets, daily news, indexes, stock, crypto information and a screener, which filters through thousands of companies detail descriptions for further analysis.

Services Limited to Specific Types of Investments

FIN limits its investment advice to equity securities.

C. Client Tailored Services and Client Imposed Restrictions

FIN will provide a specific set of recommendations for each client based on their personal restrictions, needs, and targets. Clients may request FIN exclude certain securities or securities in certain sectors or industries from FIN's recommendations in accordance with the client's values or beliefs. However, if the restrictions would require FIN to deviate from its standard suite of services, FIN reserves the right to end the relationship.

D. Wrap Fee Programs

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, and certain other administrative fees. FIN does not participate in wrap fee programs.

E. Assets Under Management

FIN does not manage client accounts on a continuous basis.

Item 5: Self Elected Trading

Finequities may permit Clients outside of the Advisory Portfolios (Diversified portfolios and "Portfolio Flavors") to make their own investment decisions and direct their own trades through the mobile App or Finequities website. This is referred to as "Self-Elected Trading." With Self-Elected Trading, Finequities provides participating clients with access to a comprehensive list of securities contained in the indices offered. Finequities provides the ability to limit such list to reasonably match a Client's suitability level or category based on the information provided by the Client. Finequities will not be providing any specific recommendations or investment advice about the securities on the Self-Elected Trading List and providing the Self-Elected Trading List does not mean that Finequities is recommending that Client purchase, hold or sell any of the securities on the Self-Elected Trading List. Finequities is only providing advisory services to the extent that it has pre-selected the Self-Elected Trading List. As a result, Finequities is only acting as an investment adviser with respect to selecting the Self-Elected Trading List, and not in connection with transactions which are made by Clients that choose to conduct Self-Elected Trading in Client's own discretion. If a Client purchases a security under Self-Elected Trading, Finequities does not provide specific recommendations or advice as to the amount of the security or whether the specific security or transaction or amount to be traded is appropriate for the individual beyond its inclusion in the Self-Elected Trading List. Similarly, Finequities does not provide monitoring or advice as to when or if the Client should sell, buy more, or continue to hold such security, whether such trading or security is overly concentrated or volatile, or whether the amount purchased or held is

suitable for the client. A security suitable for investment may become unsuitable based on market events, volatility or an excessive concentration in such security. Finequities will not consider investments and assets outside of Finequities. Clients choosing to purchase individual securities on the Self-Elected Trading List may create an excessive concentration in one or more securities, sectors, or asset classes without the client's knowledge, inconsistent with their risk profile and contra indicated to Finequities' recommendation. Finequities does not monitor Self-Elected Trading for such events or considerations. Each Client shall be solely responsible for the trading decisions of such Client's Self-Elected Trading.

Finequities does not charge any management fee for self-elected trading service since is not offering any advisory services in connection with such actual trading and such trading is done solely by the client.

Item 6: Fees and Compensation

The use and enjoyment of the social network is free of charge. However, if you choose to make investments based on our portfolio recommendations, there is a one-time \$15 fee (per recommended portfolio) paid only once if the unrealized gain of your portfolio is \$15 greater than the value of your purchase. This will apply to all recommended portfolios that Finequities offers on a discretionary basis.

In turn, in the case of the sale of any of the individual shares that are part of the recommendation, the same rule will be followed with respect to earnings: $\text{Selling price} - \text{purchase price} = \15 fee .

Once the investor chooses one of our recommended portfolios, we will adapt the capital to be invested to the investment. In this way, Finequities will adapt the client's investment to the number of shares to be purchased.

Item 7: Performance-Based Fees and Side-By-Side Management

FIN does not accept performance-based fees or other fees based on a share of capital gains.

Item 8: Types of Clients

FIN generally provides advisory services to the following types of clients although any person can subscribe to the FIN app:

- ❖ Individuals
- ❖ High-Net-Worth Individuals

There is no account minimum for FIN's services.

Item 9: Methods of Analysis, Investment Strategies, & Risk of Loss

A. Methods of Analysis and Investment Strategies

Methods of Analysis

FIN's methods of analysis include Charting analysis, Fundamental analysis, Modern portfolio theory, Quantitative analysis and Technical analysis.

Charting analysis involves the use of patterns in performance charts. FIN uses this technique to search for patterns used to help predict favorable conditions for buying and/or selling a security.

Fundamental analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

Modern portfolio theory is a theory of investment that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, each by carefully choosing the proportions of various asset.

Technical analysis involves the analysis of past market data; primarily price and volume.

Investment Strategies

FIN recommends long term trading.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

B. Material Risks Involved

Methods of Analysis

Charting analysis strategy involves using and comparing various charts to predict long and short-term performance or market trends. The risk involved in using this method is that only past performance data is considered without using other methods to crosscheck data. Using charting analysis without other methods of analysis would be making the

assumption that past performance will be indicative of future performance. This may not be the case.

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Modern portfolio theory assumes that investors are risk averse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio exists with a more favorable risk-expected return profile – i.e., if for that level of risk an alternative portfolio exists which has better expected returns.

Technical analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not take into account new patterns that emerge over time.

Investment Strategies

Long term trading is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

C. Risks of Specific Securities Utilized

Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below are not guaranteed or insured by the FDIC or any other government agency.

Equity investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Item 10: Disciplinary Information

A. Criminal or Civil Actions

There are no criminal or civil actions to report.

B. Administrative Proceedings

There are no administrative proceedings to report.

C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

Item 11: Other Financial Industry Activities and Affiliations

A. Registration as a Broker/Dealer or Broker/Dealer Representative

Neither FIN nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither FIN nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

Neither FIN nor its management persons have any financial industry relationships that create a material conflict of interest with its clients.

D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections

FIN does not utilize nor select third-party investment advisers.

Item 12: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

A. Code of Ethics

FIN has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. FIN's Code of Ethics is available free upon request to any client or prospective client.

B. Recommendations Involving Material Financial Interests

FIN does not recommend that clients buy or sell any security in which a related person to FIN or FIN has a material financial interest.

C. Investing Personal Money in the Same Securities as Clients

FIN will not recommend to clients securities in which the firm or its representatives also invest.

D. Trading Securities At/Around the Same Time as Clients' Securities

Please see Item 11.C above.

Item 13: Brokerage Practices

FIN does not recommend brokers/custodians to its clients and will not have any trading authority over client accounts.

Item 14: Review of Accounts

FIN does not review client accounts.

Item 15: Client Referrals and Other Compensation

A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

FIN does not receive any economic benefit, directly or indirectly from any third party for advice rendered to FIN's clients.

B. Compensation to Non - Advisory Personnel for Client Referrals

FIN reserves the right to compensate any user who refers a friend to sign up on the Fin App.

Item 16: Custody

FIN does not have custody of client funds or securities.

Item 17: Investment Discretion

FIN does not accept discretionary authority to manage securities accounts on behalf of clients.

Item 18: Voting Client Securities (Proxy Voting)

FIN will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

Item 19: Financial Information

A. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither FIN nor its management has any financial condition that is likely to reasonably impair FIN's ability to meet contractual commitments to clients.

B. Bankruptcy Petitions in Previous Ten Years

FIN has not been the subject of a bankruptcy petition in the last ten years.