

Puente Asesoramiento de Inversiones, LLC
Form ADV Part 3 – CRS (Customer Relationship Summary)
March 2022

Item 1: Introduction

Puente Asesoramiento de Inversiones, LLC (“we” or “the Adviser”) is registered with the Securities and Exchange Commission (“SEC”) as an investment adviser.

It is important for you to understand the difference in fees and services between brokerage firms and investment advisers. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://www.investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

Item 2: Relationships and Services

What investment services and advice can you provide me? We offer asset/portfolio management and financial advice to individuals, institutions and corporations. Our investment advisory services are provided through various types of discretionary and non-discretionary accounts pursuant to an Investment Advisory Agreement (“IAA”), which is tailored to specific needs, goals, and objectives of each client. If we service you on a non-discretionary basis, you make the ultimate decision regarding the purchase or sale of investments recommended by us. We may also provide additional services for clients from time to time as agreed between the client and the Adviser. Accounts are typically reviewed by the Chief Compliance Officer on a periodic basis or as needed due to market conditions or transactional activity, amongst other items. The Chief Compliance Officer typically reviews daily transactions entered into for investment advisory clients to determine that correct entries have been made for all client records. Monitoring of your account is included as part of the standard services we provide to you. We do not offer advice only with respect to proprietary products, or a limited menu of products or types of investments. The minimum dollar value for establishing an account is generally \$1,000,000, although initial investments of a lesser amount may be accepted at our discretion. *Please see [Form ADV Part 2A \(Brochure\) Items 4 and 7](#) for more detailed information.*

Conversation Starters Ask your financial professional

- **Given my financial situation, should I choose an investment advisory service? Why or why not?**
- **How will you choose investments to recommend to me?**
- **What is your relevant experience, including your licenses, education, and other qualifications? What do these qualifications mean?**

Item 3: Fees, Costs, Conflicts and Standard of Conduct

What fees will I pay? For discretionary and non-discretionary advisory accounts, we charge management fees that typically range from 0.375% to 2%, annually, of the net asset value of your account. Management fees are negotiable, vary due to account size and other factors, are payable quarterly in arrears, and are set in and governed by the IAA. Generally, you provide us with authorization to debit your account for fees on a quarterly basis. Management fees are prorated for each capital contribution and withdrawal made during the applicable calendar month. Accounts initiated or terminated during a calendar month will be charged a prorated fee. At times, management fees may be flat or fixed upon negotiation. A client may pay more or less fees than similar clients depending on the particular circumstances of the client, size, additional or differing levels of servicing or as otherwise agreed with specific clients. Clients that negotiate fees, including a flat fee, may end up paying a higher fee than that set forth above as a result of fluctuations in the client’s assets under management and account performance. The Adviser may also charge performance fees. In such instances, performance fees would generally be between 5% and 10%, individually negotiated with each client and may be subject to a High Water Mark. If applicable, performance fee will be charged on a quarterly basis in arrears. Additionally, you will incur certain charges imposed by custodians, brokers, and other third parties such as fees charged by fund managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic funds 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. The more assets you have in the advisory account, including cash, the more you will pay us. We therefore have an incentive to increase the assets in your account in order to increase our fees. You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. *Please see [Form ADV Part 2A \(Brochure\) Item 5](#) for more detailed information.*

Conversation Starters Ask your financial professional

- **Help me understand how these fees and costs might affect my investments. If I give you \$1,000,000 to invest, how much will go to fees and costs, and how much will be invested for me?**

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What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have? When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they affect the recommendations we provide you. Here are some examples to help you understand what this means: The Adviser maintains common ownership with affiliated entities, including Puente Servicios Financieros LLC (broker-dealer). These affiliations may present an incentive since the related persons can recommend the services of the Adviser, or we can receive research and reporting services from them. Our employees and their family members can recommend or invest in securities in which our related persons or affiliate, directly or indirectly, have a position or material financial interest. Similarly, we and our related persons can buy or sell for ourselves securities that we also recommend to you. Such transactions can include trading in securities in a manner inconsistent with the advice given to you. In certain instances, the results of the investment activities of our associated or related persons for their accounts can differ from the results achieved by or for the account or accounts that we manage for you. Additionally, if your account is subject to performance fees, such fee arrangement can create an incentive for Adviser to recommend investments which may be riskier or more speculative than those which would be recommended under a different fee arrangement. Performance fee arrangements may also create an incentive to favor higher fee paying accounts over other accounts in the allocation of investment opportunities. We have policies and procedures to monitor the potential conflicts disclosed above. Such procedures are designed and implemented to ensure that all clients are treated fairly and equally, and to prevent conflicts from influencing the allocation of investment opportunities among clients. We render only disinterested and impartial advice to clients and our goal is to comply with fiduciary obligations. We are responsible for recommending investments based on your investment objectives and risk tolerance. ***Please see Form ADV Part 2A (Brochure) Items 6, 10, 11 for more detailed information.***

Conversation Starters Ask your financial professional

- **How might your conflicts of interest affect me, and how will you address them?**

How do your financial professionals make money? Neither we nor any of our supervised persons (employees) accept compensation for the sale of securities or other investment products. Our financial professionals are solely compensated on a salary basis. In the event that investment advisors get increased compensation based on production, or based on registration with affiliate broker dealer, we will promptly make relevant amendments and disclosures.

Item 4: Disciplinary History

Do you or your financial professionals have legal or disciplinary history? No, we do not, as noted on Form ADV Part 1, Item 11, Part 2A Item 9, or disclosures for any of our financial professionals in Items 14 A-M of their Form U4. Please visit Investor.gov/CRS for a free and simple search tool to research us or our financial professionals.

Conversation Starters Ask your financial professional

- **As a financial professional, do you have any disciplinary history? For what type of conduct?**

Item 5: Additional Information

To obtain more information, you may visit Investor.gov for a free and simple search tool to research our firm and our financial professionals. To report a problem to the SEC, visit Investor.gov or call the SEC's toll-free investor assistance line at (800) 732-0330. If you have a problem with your investments, investment account or a financial professional, contact us in writing at 801 Brickell Avenue, Suite 2010, Miami, FL 33131. For additional information on our investment advisory services, see our Form ADV and additional details on IAPD on Investor.gov. Information regarding our firm can also be found at adviserinfo.sec.gov or by calling our firm at (786) 832-0540 for up-to-date information or to request a copy of the relationship summary.

Conversation Starters Ask your financial professional

- **Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?**