

Insigneo Advisory Services, LLC.
Form ADV Part 3 – CRS (Customer Relationship Summary)
June 18, 2020

Item 1: Introduction

Insigneo Advisory Services, LLC (“we” or “the Adviser”) is registered with the Securities and Exchange Commission (“SEC”) as an investment adviser.

Is An Investment Advisory Right For You?

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, 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 investment advisory services to retail and institutional clients through discretionary and non-discretionary accounts pursuant to an Investment Advisory Agreement (“IAA”). The advice we provide is tailored to specific needs, goals, and objectives of each client. We call this relationship “Insigneo’s Managed Account Program.” Within this Program, we provide our own managed portfolio to clients which we call the Insigneo MultiAsset Portfolios (“I-maps’). With I-maps, the Investment Committee of the Adviser for I-maps selects securities appropriate for your risk profile which are held directly in your account. We also provide portfolio management and administrative services to client accounts, including researching, analyzing, structuring and negotiating potential investments, monitoring the performance of investments and advising clients as to the disposition of investment opportunities (Consulting Services). Additionally, we can recommend to certain clients that they authorize the active discretionary management of a portion of their assets by certain investment managers that are not affiliated with Adviser. From time to time, we may also recommend affiliated investment managers to certain clients based on their investment objectives, guidelines and risk profiles. In such cases, we will continue to render services to such clients and, in addition, monitor and review the performance of the third-party manager and the performance of the accounts that are being managed. We require a minimum account size of \$100,000 to manage your account, although we reserve the right to waive it. I-maps has an account minimum of \$50,000, although in certain circumstances it may be waived.

Conversation Starters Ask your financial professional

- **Given my financial situation, should I choose an investment advisory service?**
- **Given my financial situation, should I choose a brokerage service? Should I choose both types of services? 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? Fees for the management of accounts will be based upon a percentage of the total assets in the account. We typically receive an annual management fee, between 0.40% and 2%, based on the gross asset value of the account, although all rates are negotiable. Clients of Discretionary and Non-Discretionary accounts are required to authorize us to directly debit management fees from their accounts quarterly. Fees for Consulting Services and other non-discretionary programs are billed to clients, although clients may pre-authorize their custodians to automatically deduct the fees upon receipt of an invoice. Fees for Consulting Services are typically based on a fixed amount or as a percentage of assets managed, as agreed with the client. Depending on the custodian’s capacities to calculate advisory fees, fees for all programs are paid in advance or in arrears, and all fees are deducted or billed to you quarterly. Clients who participate in the Managed Account Program will also be subject to a platform fee, which is comprised of Insigneo fees for services, fee-billing engine and technology, account rebalancing, account reporting, and other operational and administrative services. Additionally, you will also 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. We may also send brokerage orders through our affiliate, Insigneo Securities. Upon processing orders through Insigneo Securities and those orders are executed, your account will be charged a flat service fee reflected as a service charge on your confirmation. This charge is utilized in part to cover certain operational and execution costs incurred by the Insigneo Securities trading desk. Separately, we offer Wrap Fee Programs (including I-maps) which provides clients with the ability to invest in certain investment products without

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Form ADV Part 3 – CRS (Customer Relationship Summary)
June 8, 2020

incurring separate customary brokerage commissions and markups/markdowns charges. In this case, one fee is charged as a percentage of assets under management, which includes the cost of brokerage and platform fee with IAS's affiliate Insigneo Securities. The management fee for the Wrap Program ranges from 0.50% to 2.0% of the gross asset value of the account. A portion of the fees paid to us are used to cover the securities brokerage commissions and transactional costs attributed to the management of our clients' portfolios.

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: We may direct execution of client securities through Insigneo Securities, limiting the ability of commission rates to be negotiated on an arms' length basis with other execution venues. You may be able to obtain less expensive execution of securities transactions if a broker-dealer other than Insigneo Securities is used. Additionally, we are under common control with Insigneo Capital S.A., who acts as Investment Manager to certain private placement and/or pooled investment vehicles that may be offered to you. The directors/ beneficial owners of Insigneo Capital are also directors / beneficial owners of the Adviser and its affiliates. Insigneo Capital, its affiliates and their respective members, shareholders, officers and employees and their respective affiliates, may from time to time (1) incur expenses on behalf of the referenced offerings, (2) receive additional compensation for offering such investments, and (3) spend substantial time and attention on other business activities, among others. 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. We have policies and procedures to monitor the potential conflicts disclosed above. 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.

How do your financial professionals make money? Our financial professionals receive a percentage of the fee received by the Adviser based on assets under management, according to respective arrangements between the Adviser and each individual financial professional. Additionally, some of our supervised persons accept compensation for the sale of securities or other investment products, in their individual capacities as registered representatives of our affiliated broker-dealer, Insigneo Securities. Some of our supervised persons also accept trailer fees pertaining to grandfathered existing positions of certain mutual fund shares. Please ask us for more information, and you can find more information about this in our ADV

Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me? Your fee does not vary based on the type of investments we select on your behalf. 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. As your investment adviser, we will 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.

Item 4: Disciplinary History

Do you or your financial professionals have legal or disciplinary history? The Adviser does not have legal or disciplinary history, however, some of our financial professionals have certain disclosures and disciplinary history, as noted in Items 14 A–M on Form U4. Information on legal or disciplinary history may be publicly available through BrokerCheck. 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

Where is additional information available? Seek out additional information. 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

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June 8, 2020

professional, contact us in writing at 777 Brickell Avenue, Suite 1010. Miami, FL 33131. For additional information on our investment advisory services, see our Form ADV on IAPD or Investor.gov. Information regarding our firm can be found at adviserinfo.sec.gov. Or by calling our firm at 305-373-9000 for up-to-date information.

Who is the primary contact person at your firm? An investment adviser representative (portfolio manager) will be assigned your account. Who can you talk to if you have concerns about how this person is treating you? You may reach our Chief Compliance Officer, Beatriz Gutierrez, at 305-373-9000, Ext 1202, and your concerns will be addressed immediately.