

Item 1 - Cover Page

Mazuelos & Company, LLC

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Form ADV Part 2A Brochure

March 21, 2024

Mazuelos & Company, LLC is a registered investment adviser. An "investment adviser" means any person who, for compensation, engages in the business of advising others, either directly or through publications or writings, as to the value of securities or as to the advisability of investing in, purchasing, or selling securities, or who, for compensation and as part of a regular business, issues or promulgates analyses or reports concerning securities. Registration with the SEC or any state securities authority does not imply a certain level of skill or training.

This brochure provides information about the qualifications and business practices of Mazuelos & Company, LLC. If you have any questions about the contents of this brochure, please contact us at (954) 695-8880 or Robert@MazuelosCo.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 Mazuelos & Company, LLC is available on the SEC's website at www.adviserinfo.sec.gov. Our firm's unique CRD number is 316534.

Item 2 - Material Changes

The purpose of this page is to inform you of any material changes since the previous version of this disclosure brochure. We review and update, as needed, our brochure at least annually to make sure that it remains current.

On March 1, 2024, we submitted our firm's required annual updating amendment for fiscal year 2023. We had no material changes to report with that filing.

If you have any questions or if you would like to receive a copy of our current brochure free of charge at any time, contact us at (954) 695-8880 or Robert@MazelosCo.com.

Item 3 - Table of Contents

Item 1 - Cover Page	1
Item 2 - Material Changes.....	2
Item 3 - Table of Contents	3
Item 4 - Advisory Business	4
Item 5 - Fees and Compensation.....	5
Item 6 - Performance-Based Fees and Side-By-Side Management.....	7
Item 7 - Types of Clients	8
Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss	8
Item 9 - Disciplinary Information	11
Item 10 - Other Financial Industry Activities or Affiliations.....	11
Item 11 - Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	12
Item 12 - Brokerage Practices	12
Item 13 - Review of Accounts	14
Item 14 - Client Referrals and Other Compensation	15
Item 15 - Custody	15
Item 16 - Investment Discretion.....	15
Item 17 - Voting Client Securities.....	16
Item 18 - Financial Information.....	16
Item 19 - Requirements of State-Registered Advisers	16
Form ADV Part 2B Brochure Supplement.....	18
Privacy Notice	22

Item 4 - Advisory Business

Mazuelos & Company, LLC (hereinafter “Mazuelos & Company” or the “firm”) is a registered investment adviser based in Fort Lauderdale, Florida. We are a limited liability company, organized under the laws of the State of Florida. We have been providing investment advisory services since 2021. Robert Mazuelos, Authorized Member, Managing Director, and Chief Compliance Officer, is the sole owner of Mazuelos & Company.

You may see the term Associated Person throughout this Brochure. As used in this Brochure, this term refers to anyone from our firm who is an officer, employee, and all individuals providing investment advice on behalf of our firm, including Mr. Mazuelos. Where required, such persons are properly registered as investment adviser representatives.

Currently, we offer the following personalized investment advisory service.

Portfolio Management Services

Mazuelos & Company primarily offers its clients discretionary portfolio management services. If you participate in our discretionary portfolio management services, we require you to grant us discretionary authority to manage your account. Subject to a grant of discretionary authorization, we have the authority and responsibility to formulate investment strategies on your behalf. Discretionary authorization will allow us to determine the specific securities, and the amount of securities, to be purchased or sold for your account without obtaining your approval prior to each transaction. Discretionary authority is typically granted by the investment advisory agreement you sign with our firm and relevant trading authorization forms with your account custodian.

Because we use model portfolios, clients may not set restrictions on the specific holdings within the models nor the types of securities that can be purchased in the models. However, clients may hold assets outside of, and in addition to, holdings in the model portfolios. For assets held outside the model portfolios, you can limit our discretionary authority or you may request specific transactions by providing our firm with your written restrictions, guidelines, or instructions.

At our sole discretion, we may agree to manage assets on a non-discretionary basis. If you enter into non-discretionary arrangements with our firm, we must obtain your approval prior to executing any transactions on behalf of your account. You have an unrestricted right to decline to implement any advice provided by our firm on a non-discretionary basis.

As part of our management services, we utilize financial planning software, to assist with tailoring our investment advice to meet our clients’ needs and investment objectives. If you decide to hire our firm to manage your portfolio, we will meet with you to gather your financial information, discuss your goals, and decide how much risk you should take in your investments. The information we gather will help us implement an asset allocation strategy using one or more portfolio models provided by third-party planning software based on your specific needs and objectives.

Mazuelos & Company typically invests client assets in equity securities, mutual funds, exchange traded funds, among other types of securities. Once we construct your investment portfolio, we will monitor your portfolio’s

performance on a continuous basis, and rebalance the portfolio whenever necessary, as changes occur in market conditions, your financial circumstances, or both.

Wrap Fee Programs

Mazuelos & Company does not manage or sponsor any wrap fee programs. Our portfolio management fees are exclusive of, and in addition to brokerage commissions, transaction fees, and other related costs and expenses that will be incurred by the client. However, we will not receive any portion of the commissions, fees, and costs. Please see Item 5 below for information regarding additional fees and Item 12 below for further information on brokerage practices, fees, and transaction costs.

Assets Under Management

As of December 31, 2023, we managed approximately \$15,270,937 in discretionary assets. We did not have any non-discretionary assets under management.

Item 5 - Fees and Compensation

Portfolio Management Fees

Mazuelos & Company charges an annual fee based upon a percentage of the assets being managed. Financial planning is included at no additional charge. Our annualized fees are as follows:

<u>Assets Under Management</u>	<u>Annual Fee</u>
Under \$1,000,000	1.25%
\$1,000,001 to \$3,000,000	1.00%
\$3,000,001 to \$5,000,000	0.60%
Above \$5,000,000	Negotiable

Portfolio management fees are negotiable depending on factors such as the amount of assets under management, range of investments, and complexity of the client's financial circumstances, among others. The agreed upon fee to be paid by the client will be clearly stated in the management agreement signed by the client and the firm. Portfolio management fees are payable quarterly, in arrears based on the average daily balance, as detailed in the management agreement. If the management agreement is executed at any time other than the first day of a calendar quarter, our fees will apply on a pro rata basis, which means that the advisory fee is payable in proportion to the number of days in the quarter for which you are a client.

The firm treats cash and cash equivalents as an asset class. Accordingly, unless otherwise agreed in writing, all cash and cash equivalent positions (e.g., money market funds, etc.) are included as part of assets under management for purposes of calculating the firm's advisory fee. At any specific point in time, depending upon perceived or anticipated market conditions/events (there being no guarantee that such anticipated market conditions/events will occur), the firm may maintain cash and/or cash equivalent positions for defensive, liquidity, or other purposes. While assets are maintained in cash or cash equivalents, such amounts could miss market advances and, depending upon current yields, at any point in time, the firm's advisory fee could exceed the interest paid by the client's cash or cash equivalent positions.

The firm has a fiduciary duty to provide services consistent with the client's best interest. As part of its investment advisory services, the firm will review client portfolios on an ongoing basis to determine if any changes are necessary based upon various factors, including but not limited to investment performance, fund manager tenure, style drift, account additions/withdrawals, the client's financial circumstances, and changes in the client's investment objectives. Based upon these and other factors, there may be extended periods of time when the firm determines that changes to a client's portfolio are neither necessary nor prudent. Notwithstanding, unless otherwise agreed in writing, the firm's annual investment advisory fee will continue to apply during these periods, and there can be no assurance that investment decisions made by the firm will be profitable or equal any specific performance level(s).

At our discretion, we may combine the account values of family members living in the same household to determine the applicable management fee. For example, we may combine account values for you and your minor children, joint accounts with your spouse, and other types of related accounts. Combining account values may increase the asset total, which may result in your paying a reduced management fee based on the available breakpoints in our fee schedule stated above.

We will deduct our fee directly from the managed account(s) through the unaffiliated, qualified custodian holding the client's funds and securities provided that:

- Mazuelos & Company does not have access to client funds for payment of fees without client consent in writing. The client provides written authorization permitting the fees to be paid directly from the client's account held by the account custodian.
- Mazuelos & Company sends the client an invoice showing the amount of the fee, the time period covered by the fee, the value of the client's assets on which the fee is based, and the specific manner in which the fee was calculated.
- Mazuelos & Company discloses to the client that it is the client's responsibility to verify the accuracy of the fee calculation and that the custodian will not determine whether the fee is properly calculated.
- Mazuelos & Company will send an invoice to the custodian indicating the amount of the fee to be paid by the custodian.
- The custodian agrees to send the client a statement, at least quarterly, indicating all amounts dispersed from the account, including the amount of the advisory fee paid directly to Mazuelos & Company. Mazuelos & Company will also receive a copy of your account statements from the custodian. Please review each statement for accuracy. Please let us know immediately if you have questions about or if you did not receive a statement.

The client must consent in advance to direct debiting of advisory fees from their account(s).

You may terminate the management agreement within five days of entering into the management agreement without penalty. After the five-day period, either party may terminate the management agreement upon 10 days' prior written notice to the other party. Fees will be pro-rated for any partial quarter. Any pre-paid, unearned fees will be promptly refunded to the client.

Additional Fees and Expenses

All fees paid to Mazuelos & Company for investment advisory services are separate and distinct from the fees and expenses charged to shareholders by mutual funds or exchange traded funds. These fees and expenses are described in each fund's prospectus. These fees generally include a management fee, other fund expenses, and a possible distribution fee. If the fund also imposes sales charges, you may pay an initial or deferred sales charge.

You could invest in a mutual fund directly, without the services of Mazuelos & Company. In which case, you would not receive the services provided by Mazuelos & Company, which are designed, among other things, to assist you in determining which mutual fund or funds are most appropriate to your financial condition and objectives. Accordingly, you should review both the fees charged by the funds and the fees charged by Mazuelos & Company to fully understand the total amount of fees to be paid by you to evaluate the advisory services being provided.

IRA Rollover Considerations

As a normal extension of financial advice, we provide education or recommendations related to the rollover of an employer-sponsored retirement plan. A plan participant leaving employment has several options. Each choice offers advantages and disadvantages, depending on desired investment options and services, fees and expenses, withdrawal options, required minimum distributions, tax treatment, and the investor's unique financial needs and retirement plans. The complexity of these choices may lead an investor to seek assistance from us.

An Associated Person who recommends an investor roll over plan assets into an Individual Retirement Account ("IRA") may earn an asset-based fee as a result, but no compensation if assets are retained in the plan. Thus, we have an economic incentive to encourage an investor to roll plan assets into an IRA. In most cases, fees and expenses will increase for the investor as a result because the above-described fees will apply to assets rolled over to an IRA, and outlined ongoing services will be extended to these assets.

We are fiduciaries under the Investment Advisers Act of 1940 and when we provide investment advice to you regarding your retirement plan account or individual retirement account, we are also fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. We have to act in your best interests and not put our interests ahead of yours. At the same time, the way we make money creates some conflicts with your interests.

Item 6 - Performance-Based Fees and Side-By-Side Management

Performance-based fees are based on a share of capital gains on or capital appreciation of the client's assets. Mazuelos & Company does not charge or accept performance-based fees.

Item 7 - Types of Clients

Mazuelos & Company generally offers investment advisory services to individuals, including high net worth individuals, trusts, and small businesses. We do not require a minimum account balance to establish an advisory relationship.

Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss

The investment advice provided along with the methods of analysis and the strategies recommended by Mazuelos & Company will vary depending on your specific financial situation and goals. There are many risks to consider. This brochure does not disclose all of the possible risks and other significant aspects of investing in financial markets. In light of the risks, you should fully understand the nature of the contractual relationship(s) into which you are entering and the extent of your exposure to risk. Certain investing strategies may not be suitable for everyone. You should carefully consider whether the strategies employed would be appropriate for you in light of your experience, objectives, financial resources and other relevant circumstances.

Investing in securities involves risk of loss that you should be prepared to bear. We cannot and do not represent, warrant, or imply that the services or methods of analysis employed by us can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to market corrections or declines.

Mazuelos & Company generally uses the following method of analysis:

- **Fundamental Analysis** – fundamental analysis is a technique that attempts to determine a security's value by focusing on underlying factors that affect a company's actual business and its future prospects. The term refers to the analysis of the economic well-being of a financial entity as opposed to only its price movements.

We generally use the following investment strategy:

- **Long Term Purchases** – securities held for over a year.

General Investment Risk: All investments come with the risk of losing money. Investing involves substantial risks, including complete possible loss of principal plus other losses and may not be suitable for everyone. Investments, unlike savings and checking accounts at a bank, are not insured by the government to protect against market losses. Different market instruments carry different types and degrees of risk and you should familiarize yourself with the risks involved in the particular market instruments in which you intend to invest.

Loss of Value: There can be no assurance that a specific investment will achieve its investment objectives and past performance should not be seen as a guide to future returns. The value of investments and the income derived may fall as well as rise and investors may not recoup the original amount invested. Investments may also be affected by any changes in exchange control regulation, tax laws, withholding taxes, international, political, and economic developments, and government, economic, or monetary policies.

Interest Rate Risk: Fixed income securities and funds that invest in bonds and other fixed income securities may fall in value if interest rates change. Generally, the prices of debt securities rise when interest rates fall, and their prices fall when interest rates rise. Longer-term debt securities are usually more sensitive to interest rate changes.

Credit Risk: Investments in bonds and other fixed income securities are subject to the risk that the issuer(s) may not make required interest payments. An issuer suffering an adverse change in its financial condition could lower the credit quality of a security, leading to greater price volatility of the security. A lowering of the credit rating of a security may also offset the security's liquidity, making it more difficult to sell. Funds investing in lower quality debt securities are more susceptible to these problems and their value may be more volatile.

Foreign Exchange Risk: Foreign investments may be affected favorably or unfavorably by exchange control regulations or changes in the exchange rates. Changes in currency exchange rates may influence the share value, the dividends or interest earned and the gains and losses realized. Exchange rates between currencies are determined by supply and demand in the currency exchange markets, the international balance of payments, governmental intervention, speculation, and other economic and political conditions. If the currency in which a security is denominated appreciates against the US Dollar, the value of the security will increase. Conversely, a decline in the exchange rate of the currency would adversely affect the value of the security.

Concentrated Position Risk: Certain Associated Persons may recommend that clients concentrate account assets in an industry or economic sector. In addition to the potential concentration of accounts in one or more sectors, certain accounts may, or may be advised to, hold concentrated positions in specific securities. Therefore, at times, an account may, or may be advised to, hold a relatively small number of securities positions, each representing a relatively large portion of assets in the account. As a result, the account will be subject to greater volatility than a more sector diversified portfolio. Investments in issuers within an industry or economic sector that experiences adverse economic, business, political conditions, or other concerns will impact the value of such a portfolio more than if the portfolio's investments were not so concentrated. A change in the value of a single investment within the portfolio will affect the overall value of the portfolio and will cause greater losses than it would in a portfolio that holds more diversified investments.

Cybersecurity Risks: Our firm and our service providers are subject to risks associated with a breach in cybersecurity. Cybersecurity is a generic term used to describe the technology, processes, and practices designed to protect networks, systems, computers, programs, and data from cyber-attacks and hacking by other computer users, and to avoid the resulting damage and disruption of hardware and software systems, loss or corruption of data, and/or misappropriation of confidential information. In general, cyber-attacks are deliberate; however, unintentional events may have similar effects. Cyber-attacks may cause losses to clients by interfering with the processing of transactions, affecting the ability to calculate net asset value or impeding or sabotaging trading. Clients may also incur substantial costs as the result of a cybersecurity breach, including those associated with forensic analysis of the origin and scope of the breach, increased and upgraded cybersecurity, identity theft, unauthorized use of proprietary information, litigation, and the dissemination of confidential and proprietary information. Any such breach could expose our firm to civil liability as well as regulatory inquiry and/or action. In addition, clients could be exposed to additional losses as a result of unauthorized use of their personal information. While our firm has established a business continuity plan and systems designed to prevent cyber-attacks, there are inherent limitations in such plans and systems, including the possibility that certain risks have not been identified. Similar types of cyber security risks are also present for issuers of securities, investment

companies and other investment advisers in which we invest, which could result in material adverse consequences for such entities and may cause a client's investment in such entities to lose value.

Pandemic Risks: Large-scale outbreaks of infectious disease can greatly increase morbidity and mortality over a wide geographic area, crossing international boundaries, and causing significant economic, social, and political disruption. It is difficult to predict the long-term impact of such events because they are dependent on a variety of factors including the global response of regulators and governments to address and mitigate the worldwide effects of such events. Workforce reductions, travel restrictions, governmental responses and policies and macroeconomic factors could negatively impact investment returns.

Recommendation of Particular Types of Securities

As disclosed under the Advisory Business section in this brochure, we recommend all types of securities and we do not necessarily recommend one particular type of security over another since each client has different needs and different tolerance for risk. Each type of security has its own unique set of risks associated with it and it would not be possible to list here all of the specific risks of every type of investment. Even within the same type of investment, risks can vary widely. However, in very general terms, the higher the anticipated return of an investment, the higher the risk of loss associated with that investment.

Risks Associated with Investing in Equities: Investments in equities generally refers to buying shares of stocks by an individual or firms in return for receiving a future payment of dividends and capital gains if the value of the stock increases. There is an innate risk involved when purchasing a stock that it may decrease in value and the investment may incur a loss.

Risks Associated with Investing in Mutual Funds: Mutual funds are professionally managed collective investment systems that pool money from many investors and invest in stocks, bonds, short-term money market instruments, other mutual funds, other securities, or any combination thereof. The fund will have a manager that trades the fund's investments in accordance with the fund's investment objective. While mutual funds generally provide diversification, risks can be significantly increased if the fund is concentrated in a particular sector of the market, primarily invests in small cap or speculative companies, uses leverage (i.e., borrows money) to a significant degree, or concentrates in a particular type of security (i.e., equities) rather than balancing the fund with different types of securities. The returns on mutual funds can be reduced by the costs to manage the funds. In addition, while some mutual funds are "no load" and charge no fee to buy into, or sell out of, other types of mutual funds do charge such fees which can also reduce returns.

Risks Associated with Investing in Exchange Traded Funds (ETF): Investing in stocks & ETF's carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Investments in these securities are not guaranteed or insured by the FDIC or any other government agency.

Risks Associated with Investing in Cryptocurrency: Cryptocurrency (e.g., bitcoin and ether), often referred to as "virtual currency," "digital currency," or "digital assets," is designed to act as a medium of exchange. Cryptocurrency is an emerging asset class. There are thousands of cryptocurrencies, the most well-known of which is bitcoin. Certain of the firm's clients may have exposure to bitcoin or another cryptocurrency, directly or indirectly through an investment such as an ETF or other investment vehicles. Cryptocurrency operates without central authority or banks and is not backed by any government. Cryptocurrencies may experience very high volatility and related investment vehicles may be affected by such volatility. As a result of holding cryptocurrency,

certain of the firm's clients may also trade at a significant premium or discount to NAV. Cryptocurrency is also not legal tender. Federal, state, or foreign governments may restrict the use and exchange of cryptocurrency, and regulation in the U.S. is still developing. The market price of many cryptocurrencies, including bitcoin, has been subject to extreme fluctuations. If cryptocurrency markets continue to be subject to sharp fluctuations, investors may experience losses if the value of the client's investments decline. Similar to fiat currencies (i.e., a currency that is backed by a central bank or a national, supra-national or quasi-national organization), cryptocurrencies are susceptible to theft, loss and destruction. Cryptocurrency exchanges and other trading venues on which cryptocurrencies trade are relatively new and, in most cases, largely unregulated and may therefore be more exposed to fraud and failure than established, regulated exchanges for securities, derivatives and other currencies. The SEC has issued a public report stating U.S. federal securities laws require treating some digital assets as securities.

Cryptocurrency exchanges may stop operating or permanently shut down due to fraud, technical glitches, hackers, or malware. Due to relatively recent launches, most cryptocurrencies have a limited trading history, making it difficult for investors to evaluate investments. Generally, cryptocurrency transactions are irreversible such that an improper transfer can only be undone by the receiver of the cryptocurrency agreeing to return the cryptocurrency to the original sender. Digital assets are highly dependent on their developers and there is no guarantee that development will continue or that developers will not abandon a project with little or no notice. Third parties may assert intellectual property claims relating to the holding and transfer of digital assets, including cryptocurrencies, and their source code. Any threatened action that reduces confidence in a network's long-term ability to hold and transfer cryptocurrency may affect investments in cryptocurrencies.

Many significant aspects of the U.S. federal income tax treatment of investments in cryptocurrency are uncertain and an investment in cryptocurrency may produce income that is not treated as qualifying income for purposes of the income test applicable to regulated investment companies. Certain cryptocurrency investments may be treated as a grantor trust for U.S. federal income tax purposes, and an investment by the firm's clients in such a vehicle will generally be treated as a direct investment in cryptocurrency for tax purposes and "flow-through" to the underlying investors.

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 us or of the integrity of our management. Neither our management persons nor we have a history of material legal or disciplinary events.

Item 10 - Other Financial Industry Activities or Affiliations

Our firm and our Associated Persons conduct financial industry relationships on an independent and unaffiliated basis. This practice minimizes any material advisory business conflicts of interest with clients.

Robert Mazuelos, Authorized Member, Managing Director, and Chief Compliance Officer, is not involved in any other financial industry activities and does not have any financial industry affiliations.

Item 11 - Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Description of Our Code of Ethics

Mazuelos & Company has adopted a Code of Ethics (the "Code") to address investment advisory conduct. The Code focuses primarily on fiduciary duty, personal securities transactions, insider trading, gifts, and conflicts of interest. The Code includes Mazuelos & Company's policies and procedures developed to protect client's interests in relation to the following topics:

- The duty at all times to place the interests of clients first;
- The requirement that all personal securities transactions be conducted in such a manner as to be consistent with the code of ethics.
- The responsibility to avoid any actual or potential conflict of interest or misuse of an employee's position of trust and responsibility;
- The fiduciary principle that information concerning the identity of security holdings and financial circumstances of clients is confidential; and
- The principle that independence in the investment decision-making process is paramount.

A copy of Mazuelos & Company's Code of Ethics is available upon request to Robert Mazuelos, Authorized Member, Managing Director, and Chief Compliance Officer, at (954) 695-8880 or Robert@MazuelosCo.com.

Personal Trading Practices

At times, Mazuelos & Company and/or its Associated Persons may take positions in the same securities as clients. This is considered a conflict of interest with clients since we have the ability to trade ahead of you and to potentially receive better pricing than you receive. To mitigate this conflict of interest, it is our policy that neither our Associated Persons nor we shall have priority over your account in the purchase or sale of securities. When placing separate trades for clients and our own accounts, we will generally be "last in" and "last out" for the trading day when trading occurs. In any case, we will uphold our fiduciary responsibilities to our clients. Front running (trading shortly ahead of clients) is prohibited. Should a conflict occur because of materiality (e.g., a thinly traded stock), disclosure will be made to the relevant client(s) at the time of trading.

Item 12 - Brokerage Practices

Mazuelos & Company has an institutional custodial relationship with Charles Schwab & Co., Inc. (Schwab), a FINRA-registered broker-dealer, member SIPC and a Qualified Custodian as defined under Rule 206(4)-2 of the Investment Advisers Act of 1940, as amended. Schwab Advisor Services (formerly called Schwab Institutional) is Schwab's business serving independent investment advisory firms like us. We are independently owned and operated; and, are not affiliated with Schwab. Schwab will hold your assets in a brokerage account; and, will buy and sell securities when we instruct them to do so. While we recommend that you use Schwab as

custodian/broker, you will decide whether to do so and open your account with Schwab by entering into an account agreement directly with them. We do not open the account for you.

Your Custody and Brokerage Costs

Schwab generally does not charge you separately for custody services, but it is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. Schwab's commission rates applicable to our client accounts were negotiated based on our commitment to maintain \$10 million of our clients' assets in accounts at Schwab. This commitment benefits you because the overall commission rates you pay are lower than they would be if we had not made the commitment. In addition to commissions, Schwab charges you a flat dollar amount as a "prime broker" or "trade away" fee for each trade that we have executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into your Schwab account. These fees are in addition to the commissions or other compensation you pay the executing broker-dealer. Because of this, and in order to minimize your trading costs, we have Schwab execute most trades for your account.

Research and Other Soft Dollar Benefits

Although not considered "soft dollar" compensation, Mazuelos & Company will normally receive benefits from Schwab Advisor Services in the form of access to its institutional brokerage, trading, custody, reporting and related services, many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer our clients' accounts while others help us manage and grow our business. Schwab's support services are generally available on an unsolicited basis (we do not have to request them) and at no charge to us as long as we keep a total of at least \$10 million of our clients' assets in accounts at Schwab. If we have less than \$10 million in client assets at Schwab, it may charge us quarterly service fees. Below is a detailed description of Schwab's support services:

Services that Benefit You: Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Schwab's services described in this paragraph generally benefit you and your account.

Services that May Not Directly Benefit You: Schwab also makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts. They include investment research, both Schwab's own and that of third parties. We may use this research to service all or some substantial number of our clients' accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:

- provide access to client account data (such as duplicate trade confirmations and account statements);
- facilitate trade execution and allocate aggregated trade orders for multiple client accounts;
- provide pricing and other market data;
- facilitate payment of our fees from our clients' accounts; and
- assist with back-office functions, recordkeeping, and client reporting.

Services that Generally Benefit Only Us: Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:

- educational conferences and events
- technology, compliance, legal, and business consulting;
- publications and conferences on practice management and business succession; and
- access to employee benefits providers, human capital consultants, and insurance providers.

Schwab may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab may also discount or waive its fees for some of these services or pay all or a part of a third party's fees. Schwab may also provide us with other benefits such as occasional business entertainment of our personnel.

Mazuelos & Company understands its duty for best execution and considers all factors in making recommendations to clients. These research services may be useful in servicing all Mazuelos & Company clients and may not be used in connection with any particular account that may have paid compensation to the firm providing such services. While Mazuelos & Company may not always obtain the lowest commission rate, Mazuelos & Company believes the rate is reasonable in relation to the value of the brokerage and research services provided.

Brokerage for Client Referrals

We do not receive client referrals from broker-dealers and custodians with which we have an institutional advisory arrangement. We do not receive other benefits from a broker-dealer in exchange for client referrals.

Directed Brokerage

We routinely recommend that you direct our firm to execute transactions through one or more broker-dealers with which we have a business relationship (i.e., Schwab). As such, we may be unable to achieve the most favorable execution of your transactions and you may pay higher brokerage commissions than you might otherwise pay through another broker-dealer that offers the same types of services. Not all advisers require their clients to direct brokerage to a specific broker-dealer.

Trade Aggregation (Block Trading)

We do not place block trades (i.e., aggregate trades for multiple client accounts for an average share price). Therefore, we may not be able to buy and sell the same quantities of securities for you as we do for other clients and you may pay higher commissions, fees, and/or transaction costs than other clients since trades are executed separately for each client account. We do not combine multiple orders for shares of the same mutual funds purchased for advisory accounts we manage because mutual funds do not trade in blocks.

Item 13 - Review of Accounts

Mazuelos & Company monitors client account holdings on a continuous basis and portfolios are rebalanced as needed. We recommend formal account reviews and meetings with clients at least annually. All accounts are reviewed by Robert Mazuelos, Authorized Member, Managing Director, and Chief Compliance Officer.

Additional reviews may be offered in certain circumstances. Triggering factors that may stimulate additional reviews include, but are not limited to, changes in economic conditions, changes in the client's financial situation or investment objectives, or upon client request.

Clients will receive statements directly from their account custodian(s) on at least a quarterly basis. Mazuelos & Company also provides performance reports at least quarterly.

Item 14 - Client Referrals and Other Compensation

We do not receive any compensation, directly or indirectly, from any third party in connection with providing investment advice to you nor do we compensate any individual or firm for client referrals.

As described in Item 12 above, Mazuelos & Company receives economic benefits from our custodial broker dealer in the form of support products and services they make available to us and other independent investment advisors whose clients maintain their accounts at these custodial broker dealers. The availability of custodial products and services is not dependent upon or based on the specific investment advice we provide our clients, such as buying or selling specific securities or specific types of securities for our clients. The products and services provided by the custodial broker dealer, how they benefit us, and the related conflicts of interest are described above (see Item 12 – Brokerage Practices).

Item 15 - Custody

We do not have physical custody of any of your funds and/or securities. Your funds and securities will be held with a bank, broker-dealer, or other independent, qualified custodian. Where we directly debit your account(s) for the payment of our advisory fees and in certain situations where we accept standing letters of authorization from you to transfer assets to third parties on your behalf, Mazuelos & Company is deemed to exercise custody over those funds or securities. In all cases, we maintain safeguards in accordance with regulatory requirements and guidelines regarding the safekeeping of your assets.

You will receive account statements from the independent, qualified custodian(s) holding your funds and securities at least quarterly. The account statements from your custodian(s) will indicate the amount of our advisory fees deducted from your account(s) each billing period. The custodian holding client assets will not verify the calculation of the advisory fees. You should carefully review account statements for accuracy. If you have questions regarding your account or if you did not receive a statement from your custodian, please contact Robert Mazuelos, Authorized Member, Managing Director, and Chief Compliance Officer at (954) 695-8880 or Robert@MazuelosCo.com.

Item 16 - Investment Discretion

Mazuelos & Company offers Portfolio Management Services on a discretionary basis. Clients must grant discretionary authority in the management agreement. Discretionary authority extends to the types and amounts of securities to be bought and sold in client accounts. Apart from the ability to withdraw advisory fees, Mazuelos & Company does not have the ability to withdraw funds or securities from the client's account. The client provides Mazuelos & Company discretionary authority via a limited power of attorney in the management agreement and in the contract between the client and the custodian.

Because we use model portfolios, clients may not set restrictions on the specific holdings within the models nor the types of securities that can be purchased in the models. However, clients may hold assets outside of, and in addition to, holdings in the model portfolios. For assets held outside the model portfolios, you can limit our discretionary authority or you may request specific transactions by providing our firm with your written restrictions, guidelines, or instructions.

Please refer to the "Advisory Business" section in this Brochure for more information on our discretionary management services.

If you have engaged us for non-discretionary portfolio management services, Mazuelos & Company will obtain your approval prior to executing all transactions in your account(s).

Item 17 - Voting Client Securities

Mazuelos & Company does not accept authorization to vote proxies on behalf of clients. At your request, we may offer you advice regarding corporate actions and the exercise of your proxy voting rights. If you own shares of applicable securities, you or your designated representative are responsible for exercising your right to vote as a shareholder. In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward any electronic solicitations to vote proxies.

Item 18 - Financial Information

Our firm does not have any financial conditions or impairments that would prevent us from meeting our contractual commitments to you. We do not take physical custody of client funds or securities, or serve as trustee or signatory for client accounts, and, we do not require the prepayment of more than \$500 in fees six or more months in advance. Therefore, we are not required to include a financial statement with this brochure.

Item 19 - Requirements of State-Registered Advisers

Principal Executive Officers and Management Persons

Robert Mazuelos, Authorized Member, Managing Director, and Chief Compliance Officer is the sole owner and management person for Mazuelos & Company. Please see Item 2 below in the attached Form ADV Part 2B brochure supplement for information regarding his educational and business background.

Outside Business Activities

As disclosed above in Item 10 – Other Financial Industry Activities and Affiliations in this Form ADV Part 2A disclosure brochure and in the Form ADV Part 2B brochure supplement, Mr. Mazuelos is not involved in any other financial industry activities and does not have any financial industry affiliations or outside business activities otherwise material to our advisory business.

Performance Based Fees

Performance based fees are based on a share of capital gains on or capital appreciation of the client's assets. As disclosed above at Item 6 of this Form ADV Part 2A disclosure brochure, our Associated Persons and we do not accept performance-based fees.

Disciplinary Information

We have no material history of legal or disciplinary events to report under this item. Information regarding Mazuelos & Company and its management persons can be found at www.adviserinfo.sec.gov.

Other Relationships or Arrangements With Issuers of Securities

Mazuelos & Company and its Associated Persons do not have any relationships or arrangements with any issuer of securities.

Robert Mazuelos

Personal CRD Number: 5818400

Mazuelos & Company, LLC

4240 Galt Ocean Drive, #506
Fort Lauderdale, FL 33308

Phone: (954) 695-8880
Email: Robert@MazuelosCo.com

Form ADV Part 2B Brochure Supplement

March 21, 2024

This Brochure Supplement provides information about Robert Mazuelos that supplements the Disclosure Brochure of Mazuelos & Company, LLC, a copy of which you should have received. Please contact us at (954) 695-8880 or Robert@MazuelosCo.com if you did not receive the Disclosure Brochure or if you have any questions about the contents of this Brochure Supplement.

Additional information about Mr. Mazuelos is available on the SEC's website at www.adviserinfo.sec.gov. Mr. Mazuelos' individual CRD number is 5818400. Mazuelos & Company, LLC's unique CRD number is 316534.

Educational Background and Business Experience - Item 2

Robert Mazuelos

Year of Birth: 1968

Formal Education After High School:

- Florida Atlantic University, M.B.A., 1996
- University of Florida, B.S., Finance, 1990

Business Background:

- Mazuelos & Company, LLC, Authorized Member/Managing Director/Chief Compliance Officer/Investment Adviser Representative, 08/2021 - Present
- Winston & Company, Investment Adviser Representative, 11/2017 – 02/2022
- Retired, 01/2014 – 10/2017
- Mercator Asset Management LP, Portfolio Manager, 06/2008 – 12/2013
- Hansberger Global Investors, Inc., Portfolio Manager, 04/1995 – 04/2008

Disciplinary Information - Item 3

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Mr. Mazuelos. Mr. Mazuelos has not been involved in any legal or disciplinary events reportable under this item. Information regarding Mr. Mazuelos' history can be found online at www.adviserinfo.sec.gov. His individual CRD number is 5818400.

Other Business Activities - Item 4

Mr. Mazuelos is not involved in any other financial industry activities and does not have any financial industry affiliations.

Additional Compensation – Item 5

Mr. Mazuelos does not receive any additional forms of compensation for advisory services provided to clients of Mazuelos & Company, LLC.

Supervision - Item 6

Mr. Mazuelos is an investment adviser representative of Mazuelos & Company, LLC. In this role, he is responsible for monitoring client portfolios for investment objectives and other supervisory reviews. Mr. Mazuelos is also the sole Authorized Member, Managing Director, and Chief Compliance Officer of Mazuelos & Company, LLC. In this capacity, he is responsible for the implementation of the firm's compliance program and the overall supervision of the firm's personnel. Mr. Mazuelos is not supervised by other Associated Persons of our firm.

Mazuelos & Company, LLC has implemented a Code of Ethics and an internal compliance program that guides the firm in meeting its fiduciary obligations to clients. Mr. Mazuelos adheres to the code of ethics and compliance manual as mandated. Clients may contact Mr. Mazuelos at the phone number listed on the cover of this Brochure Supplement, to obtain a copy of Mazuelos & Company, LLC's code of ethics.

Additionally, Mazuelos & Company, LLC is subject to regulatory oversight by various agencies. These agencies require registration by Mazuelos & Company, LLC and Mr. Mazuelos. As a registered entity, Mazuelos & Company, LLC is subject to examinations by regulators, which may be announced or unannounced. Mazuelos & Company, LLC is required to periodically update the information provided to these agencies and to provide various reports regarding firm business and assets under management.

Requirements for State-Registered Advisers - Item 7

This disclosure is required by state securities authorities. As such, we are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Mr. Mazuelos.

- A. Mr. Mazuelos has NOT been involved in any of the events listed below.
1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
 - a) an investment or an investment-related business or activity;
 - b) fraud, false statement(s), or omissions;
 - c) theft, embezzlement, or other wrongful taking of property;
 - d) bribery, forgery, counterfeiting, or extortion; or
 - e) dishonest, unfair, or unethical practices.
 2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
 - a) an investment or an investment-related business or activity;
 - b) fraud, false statement(s), or omissions;
 - c) theft, embezzlement, or other wrongful taking of property;
 - d) bribery, forgery, counterfeiting, or extortion; or
 - e) dishonest, unfair, or unethical practices.

B. Mr. Mazuelos has NOT been the subject of a bankruptcy.

Information regarding Mr. Mazuelos' history can be found online at www.adviserinfo.sec.gov. His individual CRD number is 5818400.

Privacy Notice

Mazuelos & Company, LLC

This notice is being provided to you in accordance with the Securities and Exchange Commission's rule regarding the privacy of consumer financial information ("Regulation S-P"). Please take the time to read and understand the privacy policies and procedures that we have implemented to safeguard your nonpublic personal information.

INFORMATION WE COLLECT

Mazuelos & Company, LLC must collect certain personally identifiable financial information about its customers to provide financial services and products. The personally identifiable financial information that we gather during the normal course of doing business with you may include:

- information we receive from you on applications or other forms;
- information about your transactions with us, our affiliates, or others;
- information we receive from a consumer reporting agency.

INFORMATION WE DISCLOSE

We do not disclose any nonpublic personal information about our customers or former customers to anyone, except as permitted or required by law, or as necessary to provide services to you. In accordance with Section 248.13 of Regulation S-P, we may disclose all of the information we collect, as described above, to certain nonaffiliated third parties such as our attorneys, accountants, auditors and persons or entities that are assessing our compliance with industry standards. We enter into contractual agreements with all nonaffiliated third parties that prohibit such third parties from disclosing or using the information other than to carry out the purposes for which we disclose the information.

CONFIDENTIALITY AND SECURITY

We restrict access to nonpublic personal information about you to those Employees who need to know that information to provide financial products or services to you. We maintain physical, electronic, and procedural safeguards that comply with federal standards to guard your nonpublic personal information.

ACCURACY

Mazuelos & Company, LLC strives to maintain accurate personal information in our client files at all times. However, as personal situations, facts and data change over time; we encourage our clients to provide feedback and updated information to help us meet our goals. If you have questions or need to update your information, please contact us at (954) 695-8880 or Robert@MazuelosCo.com.

Effective August 2021