

ITEM 1: COVER PAGE

Atlantis Investment Coaching, LLC

Office Address:
District View The Work Place
450 Ave De La Constitucion Ste 200
San Juan, PR 00901-2317
(787) 919-7314

Websites: <https://atlantiscoaching.com> & <https://atlantis.breakthroughinvesting.com>

Facebook: <https://www.facebook.com/savinginvestors>

Twitter: <https://twitter.com/savinginvestors>

Instagram: <https://www.instagram.com/atlantiscoaching>

LinkedIn: <https://www.linkedin.com/company/atlantis-investment-coaching-llc>

Email: info@atlantiscoaching.com

April 5, 2023

This brochure provides information about the qualifications and business practices of Atlantis Investment Coaching, LLC. If you have any questions about the contents of this brochure, please contact us at (787) 919-7314, or info@atlantiscoaching.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 Atlantis Investment Coaching, LLC is also available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for Atlantis Investment Coaching, LLC is 145416.

Atlantis Investment Coaching, LLC is a Registered Investment Adviser in the Commonwealth of Puerto Rico and is registered in other jurisdictions where it is required. Please note that registration does not imply a certain level of skill or training.

ITEM 2: MATERIAL CHANGES

1. Since our last brochure dated November 18, 2022, we added item 5.G to reflect our use of non-compensated client testimonials in advertisements.

ITEM 3: TABLE OF CONTENTS

ITEM 1: COVER PAGE..... 1

ITEM 2: MATERIAL CHANGES..... 1

ITEM 3: TABLE OF CONTENTS..... 2

ITEM 4: ADVISORY BUSINESS..... 4

 A. DESCRIPTION OF OUR BUSINESS..... 4

 B. DESCRIPTION OF ADVISORY SERVICES WE OFFER:..... 4

Financial Planning Services:..... 4

Selection of Other Advisers:..... 4

Types of Investments:..... 4

 C. IF, OR HOW WE TAILOR OUR ADVISORY SERVICES TO YOUR INDIVIDUAL NEEDS 5

 D. WRAP FEE PROGRAMS 6

 E. AMOUNT OF ASSETS WE MANAGE 6

ITEM 5: FEES & COMPENSATION..... 6

 A. HOW WE ARE COMPENSATED..... 6

Consultations, Financial Analyses and Financial Plans:..... 6

Other Advisers:..... 6

Educational Workshops:..... 7

 B. HOW OUR FEES ARE PAID 7

 C. OTHER TYPES OF FEES: 8

 D. DO WE CHARGE IN ADVANCE:..... 8

 E. DO WE GET COMPENSATED (*COMMISSIONS*) FOR THE SALES OF SECURITIES..... 9

 F. DO WE PROVIDE CONTINUOUS AND REGULAR SUPERVISORY OR MANAGEMENT SERVICES TO SECURITIES PORTFOLIOS 9

 G. DO OUR ADVERTISEMENTS USE CLIENT TESTIMONIALS 9

ITEM 6: PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT 9

ITEM 7: TYPES OF CLIENTS 9

ITEM 8: METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS 9

 A. OUR ANALYSIS & STRATEGIES AND ASSOCIATED MATERIAL RISKS: 10

 B. DO WE RECOMMEND PRIMARILY A PARTICULAR TYPE OF SECURITY: 10

ITEM 9: DISCIPLINARY INFORMATION 10

 A. CRIMINAL OR CIVIL ACTIONS:..... 10

 B. ADMINISTRATIVE PROCEEDING BEFORE THE SEC OR ANY OTHER GOVERNMENT AGENCY 11

 C. ANY SELF- REGULATORY ORGANIZATION (SRO) PROCEEDINGS..... 11

ITEM 10: OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS 11

 A. ARE WE REGISTERED REPRESENTATIVES OF A SECURITIES BROKER/DEALER: 11

 B. ARE WE A FUTURES COMMISSION MERCHANT, COMMODITY POOL OPERATOR OR A COMMODITY TRADING ADVISOR 11

 C. DO WE HAVE ANY OTHER FINANCIAL RELATIONSHIPS OR ARRANGEMENTS THAT ARE MATERIAL TO OUR BUSINESS..... 11

 D. DO WE RECOMMEND OTHER REGISTERED INVESTMENT ADVISERS AND RECEIVE COMPENSATION: . 11

ITEM 11: CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING 11

 A. DESCRIBE OUR CODE OF ETHICS:..... 11

 B. DO WE HAVE ANY MATERIAL FINANCIAL INTERESTS IN INVESTMENTS WE RECOMMEND: 12

C. DO WE INVEST IN SECURITIES WE RECOMMEND TO YOU:	12
D. DO WE BUY OR SELL SECURITIES ABOUT THE SAME TIME AS YOU:	12
ITEM 12: BROKERAGE PRACTICES	12
A. DESCRIBE THE FACTORS WE USED IN SELECTING A CUSTODIAN FOR YOU:	12
1. <i>Soft dollars</i> :	13
2. <i>Brokerage for client referrals</i> :	13
3. <i>Directed brokerage</i> :	13
B. AGGREGATING CLIENT ACCOUNTS:	13
ITEM 13: REVIEW OF ACCOUNTS	13
A. FREQUENCY & NATURE OF REVIEWS:	13
B. REVIEWS ON AN OTHER-THAN-PERIODIC BASIS:	13
C. CLIENT REPORTS:	13
ITEM 14: CLIENT REFERRALS AND OTHER COMPENSATION	14
A. DO WE GET ECONOMIC BENEFITS FROM A NON-CLIENT FOR PROVIDING CERTAIN ADVICE TO YOU:..	14
B. DO WE PAY FOR CLIENT REFERRALS:	14
ITEM 15: CUSTODY	14
ITEM 16: INVESTMENT DISCRETION	14
ITEM 17: VOTING CLIENT SECURITIES	14
A. DO WE ACCEPT AUTHORITY TO VOTE CLIENT SECURITIES:	14
B. IF WE DO NOT HAVE THAT AUTHORITY, DISCLOSE THAT FACT:	14
ITEM 18: FINANCIAL INFORMATION	15
A. DO WE REQUIRE PREPAYMENT OF FEES OF MORE THAN \$500/ MORE THAN 6 MONTHS IN ADVANCE:	15
.....	
B. IF WE REQUIRE SUCH PREPAYMENT, OR HAVE CUSTODY OR DISCRETION, IS THERE ANY IMPAIRMENT	15
FOR US TO MAKE A REFUND, IF NECESSARY:	
C. BANKRUPTCY	15
ITEM 19: REQUIREMENTS FOR STATE REGISTERED ADVISORS	15
A. OUR EDUCATION & BUSINESS BACKGROUNDS:.....	15
B. ANY OTHER BUSINESS ACTIVITIES:	15
C. PERFORMANCE-BASED FEES:	16
D-1. ARBITRATION:	16
D-2. CIVIL OR ADMINISTRATIVE PROCEEDINGS:.....	16
E. RELATIONSHIP WITH ISSUER OF SECURITIES:.....	16
ITEM 20: ADDITIONAL INFORMATION	16
A. YOUR PRIVACY:	16
B. CLASS ACTION LAWSUITS:	17

ITEM 4: ADVISORY BUSINESS

A. Description of our business

Atlantis Investment Coaching, LLC (“Atlantis”) has been a Registered Investment Adviser since 2007. Omar Pereira owns 100% of Atlantis.

B. Description of advisory services we offer:

Atlantis has always been an independent firm that offers the following investment advisory services, which are personalized to each individual client: financial planning, and selection of other advisers.

The following paragraphs describe our services and fees. Please refer to the description of each investment advisory service listed below for information on how we tailor our advisory services to your individual needs.

Financial Planning Services:

We offer broad-based and modular financial planning services. Financial planning includes tax planning, insurance planning, retirement planning and estate planning. Financial planning services may include consultations and/or written financial plans, which analyze your financial situation and makes appropriate recommendations for strategies and methods of implementation of the strategies.

NOTE: A conflict exists between the interests of the investment advisor and the interests of the clients, and you are under no obligation to act on our financial planning recommendations. Should you choose to act on any of our recommendations, you are not obligated to implement the financial plan through any of our other investment advisory services. You may also act on our recommendations by placing securities transactions with any brokerage firm.

Selection of Other Advisers:

We may recommend that you use the services of a third party investment adviser (“TPA”) to manage your entire, or a portion of your, investment portfolio. After gathering information about your financial situation and objectives, we will recommend that you engage a specific TPA or investment program. Factors that we take into consideration when making our recommendation(s) include, but are not limited to, the following: the TPA’s performance, methods of analysis, fees, your financial needs, investment goals, risk tolerance, and investment objectives. We will periodically monitor your account under management with the TPA(s) and the TPA(s)’ performance to ensure its management and investment style remains aligned with your investment goals and objectives.

Types of Investments:

We primarily offer advice on no-load asset-class, structured, or index funds, however we may also offer advice on other types of mutual funds, equity securities, warrants, corporate debt securities, commercial paper, certificates of deposit, municipal securities, investment company securities, US Government securities, options contracts on securities

and commodities, futures contracts on securities and commodities, and interests in partnerships investing in real estate and oil and gas.

Additionally, we may advise you on any type of investment that we deem appropriate based on your stated goals and objectives. We may also provide advice on any type of investment held in your portfolio at the inception of our advisory relationship.

You may request that we refrain from investing in particular securities or certain types of securities. You must provide these restrictions to our firm in writing.

C. If, or how we tailor our advisory services to your individual needs

All of our clients are different, so we tailor our services to meet your needs by consultations to discover your individual hopes, goals and dreams. Then we analyze your current investments and make suggestions how to meet your individual hopes, goals and dreams. Of course, you may impose restrictions on investing in certain securities or types of securities (Please refer to Item 16.)

Financial planning will typically involve the following advisory services, based upon an analysis of your individual needs:

- a) Meet with you to gather information about your financial circumstances and objectives.
- b) Organize what you own and what you owe in order to provide you with a clear picture of your finances
- c) Provide recommendations related to meeting your goals and objectives, and to improving your financial health
- d) Deliver a written plan to you, designed to help you achieve your stated financial goals and objectives.
- e) In some circumstances, you may only require advice on a single aspect of the management of your financial resources. In these cases, we offer financial plans in a modular format that address only that specific aspect of interest or concern. We call this a “Financial Analysis”.
- f) Regarding investment advice, we will help you do the following:
 - a. Identify your personal risk tolerance
 - b. Understand how to measure diversification in your portfolio
 - c. Develop a system to measure portfolio volatility
 - d. Define your investment philosophy
 - e. Define and develop an investment strategy that is consistent with your investment philosophy
 - f. Recommend and refer you to an investment adviser that will help you execute your investment strategy

Financial plans and financial analyses are based on your financial situation at the time we present the plan to you, and on the financial information you provide to our firm. You must promptly notify our firm if your financial situation, goals, objectives, or needs change.

D. Wrap fee programs

Atlantis does not participate in wrap-fee programs.

E. Amount of assets we manage

We do not manage client assets. We refer you to TPA's that will manage your assets using the investment philosophies and strategies that we also believe in and that we teach you.

ITEM 5: FEES & COMPENSATION

A. How we are compensated

Consultations, Financial Analyses and Financial Plans:

We charge a negotiable hourly fee of up to \$300 per hour for consultations, depending on the complexity of your financial situation. The payment of a retainer may be required, and such retainer will not exceed \$500. We may also charge a fixed fee of up to \$500 on a per-consultation basis.

We may also charge a flat fee for financial analyses, or financial plans, ranging from \$500 to \$5,000, and payable in advance.

In any case the fee is charged in advance, it will be for services that will always be delivered well within 6 months of our engagement. If you cancel, please see "D" below.

You may terminate the financial planning agreement by providing written notice to our firm. You will incur a pro rata charge for services rendered prior to the termination of the agreement.

Other Advisers:

We do not charge you a separate fee for the selection of other money managers (third party advisers or TPA). If we help you select other money managers and we monitor them for you, then the other advisers, which are registered or notice-filed in the jurisdictions where we are registered, pay us up to 100% of the fees they charge you, or they will remit the fees we agree to charge you directly from your account.

For an explanation of the other advisers' fee and services, please refer to their brochure (Form ADV) and other materials, available from us.

These fees may or may not be negotiable. Our compensation may differ depending upon the individual agreement we have with each TPA. As such, a conflict of interest may arise where our firm or our Associated Persons may have an incentive to recommend one TPA over another TPA with whom we have more favorable compensation arrangements or other advisory programs offered by TPAs with whom we have less or no compensation arrangements. We mitigate this potential conflict of interest by establishing the same compensation arrangements with all TPA's whenever possible and by compensating our Associated Persons equally regardless of the TPA that they recommend.

Currently, the only third-party adviser we refer our clients to is Matson Money, Inc. (“Matson Money”), an SEC Registered Investment Adviser. Additional information about Matson Money can be found on www.matsonmoney.com, and at the SEC’s website at www.adviserinfo.sec.gov. The searchable CRD number for Matson Money, Inc. is 110425.

Educational Workshops:

We hold various educational workshops and seminars throughout the year, primarily for our existing clients and their guests. In some occasions, the general public is invited, and we may decide to charge non-clients a fee, ranging from \$0 to \$1,000, for such workshops or seminars.

NOTE: Lower fees for comparable services may be available from other sources.

B. How our fees are paid

Atlantis receives fees for referring clients to Matson Money in one of two methods:

Method 1: Matson Fund Platform Fees:

If you select the Matson Fund Platform you will pay our advisory fees as follows, outside of the Matson Fund:

- Up to 1.40% on the first \$500,000 invested with Matson Money (new clients up to 0.85%)
- Up to 1.00% on the next \$500,000 (new clients up to 0.85%)
- Up to 0.75% on the next \$3,000,000
- Up to 0.50% on the remainder over \$4,000,000

Such fees are charged quarterly in advance. These fees compensate Atlantis and Atlantis’ Adviser Representatives for maintaining our relationship with you, ensuring that your questionnaire remains up-to-date, and responding to your inquiries.

For non-ERISA accounts, 100% of our advisory fees are debited automatically from your account by Matson Money and paid to us. For some ERISA accounts, a third-party administrator debits the fees, as calculated by Matson Money, and may pay them to us. Matson Money is, however, willing to allow you to pay the advisory fees to us directly, subject to our agreement to this arrangement.

Method 2 - Private Account Asset Allocation Fees (this method is not available to new accounts)

If you select the Private Account Asset Allocation program you will pay to Matson Money advisory fees as follows:

- 2% on the first \$500,000 invested with Matson Money
- 1% on the next \$500,000
- 0.75% on the next \$3,000,000
- 0.50% on the remainder over \$4,000,000

Matson Money will share this fee with Atlantis or Atlantis' Adviser Representatives, in accordance with a separate agreement between Matson Money and us and our Adviser Representatives. Fees are automatically deducted from your Account.

C. Other types of fees:

Our fees do not include transaction fees, brokerage commissions and other related costs and expenses, which you may pay. As part of our investment advisory services to you, we may recommend that you invest in mutual funds and/or exchange traded funds. The fees that you pay to our firm for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds or exchange traded funds (described in each fund's prospectus) to their shareholders. These fees will generally include a management fee and other fund expenses. You may also incur transaction charges and/or brokerage fees when purchasing or selling securities. The broker-dealer or custodian through whom your account transactions are executed may impose these charges and fees. We do not share in any portion of the brokerage fees/transaction charges imposed by the broker-dealer or custodian. To fully understand the total cost you will incur, you should review all the fees charged by mutual funds, exchange-traded funds, our firm, and others. For information on our brokerage practices, please refer to the "Brokerage Practices" section of this brochure (item 12). You may also pay fees charged by your custodian and other money managers, including: management fees, custodial fees, mutual fund fees, taxes and transfer fees. We do not receive a portion of any of these fees, but they are a necessary part of doing business in the securities industry. Please remember that by not charging securities sales commissions, we are keeping your out-of-pocket expenses as low as we possibly can. (Please refer to item 12.)

D. Do we charge in advance:

We charge fees in advance for financial analyses and financial plans. If we prepare a written financial analysis or plan for you, the fee is due in advance, but the presentation of the analysis or plan will always be within 6 months of our engagement. If you cancel after we have done over half the plan, no refund will be paid. If you cancel before half the plan is finished, how much of the written financial plan that is actually completed when you cancel will depend on what percentage of the work is completed. For example, if 30% of the work has been completed, you'll get a 70% refund.

Advisory fees on Matson Money accounts are payable quarterly in advance in increments of one-fourth the annual percentage fee. Fees are generally based upon the value of an account as of the last business day of each quarterly period. However, when you add assets to, or withdraw assets from, your account during the quarter, Matson Money will refund its fee for withdrawals on a prorated basis and charge an additional fee for additions to an account on a prorated basis. Refunds will be made or additional fees collected within ninety (90) days of Matson Money's receipt of notice of a withdrawal or addition. If pro-rated fee adjustments are to be paid by check, a minimum of One Dollar (\$1.00) must be due. Otherwise there is no minimum threshold for pro-rated fee adjustments.

E. Do we get compensated (*commissions*) for the sales of securities

No one at Atlantis accepts commissions or any other form of compensation for *selling* you securities or other investment products. However, our representatives can & do earn insurance product commissions, if you choose to purchase such products.

F. Do we provide continuous and regular supervisory or management services to securities portfolios

We do not directly manage client assets. Therefore, we do not provide continuous and regular supervisory or management services to securities portfolios. This work is performed by the selected TPA.

G. Do our advertisements use client testimonials

Yes, but we do not compensate clients directly or indirectly for their testimonials.

ITEM 6: PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

We do not accept performance-based fees or participate in side-by-side management. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees. Performance-based fees are fees that are based on a share of capital gains or capital appreciation of a client's account. Our fees are calculated as described in the Fees and Compensation section above (item 5) and are not charged on the basis of a share of capital gains upon, or capital appreciation of, the funds in your advisory account.

ITEM 7: TYPES OF CLIENTS

Most of our clients are individuals; many are high net worth individuals. We also offer investment advisory services to pension and profit sharing plans, corporations, and other business entities.

In general, we do not require a minimum dollar amount to open and maintain an advisory account with other advisers, but the other adviser may impose such a minimum. However, we have the right to terminate our relationship with you if your account falls below a minimum size, which, in our sole opinion, is too small to effectively monitor. Since we prefer to only charge clients who follow our advice, we may also choose to terminate our relationship with you if we determine that you are consistently not following our advice or are not responding to our requests to meet. If we terminate our relationship with you, the TPA may also choose to terminate its relationship with you.

ITEM 8: METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

A. Our analysis & strategies and associated material risks:

We don't do technical security or fundamental security analysis. We may use one of the following methods of analysis or investment strategies when providing investment advice to you:

- Free Markets Work – This is an investment philosophy that is based on the belief that markets are efficient, and it is focused on capturing market returns, utilizing asset-class or structured funds, identifying your risk tolerance, and diversify prudently based on your chosen risk tolerance
- Free Market Portfolio Theory – this is an investment approach based on 50 years of sound academic investing research and accepted financial theories. It is a disciplined approach that seeks to capture market returns while managing volatility. The academic principles on which the Free Market Portfolio Theory is based are: an investment philosophy based on the concept that Free Markets Work, Modern Portfolio Theory, the Capital Asset Pricing Model, and the Three-Factor Model, among others.
- **Material Risks:** Market risk is that part of a security's risk that is common to all securities of the same general class (stocks and bonds) and thus cannot be eliminated by diversification.

Our investment strategies and advice may vary depending upon each client's specific financial situation. As such, we determine investments and allocations based upon your predefined objectives, risk tolerance, time horizon, financial horizon, financial information, liquidity needs, and various other suitability factors. Your restrictions and guidelines may affect the composition of your portfolio.

YOU SHOULD BE AWARE THAT INVESTING IN SECURITIES INVOLVES RISK OF LOSS THAT YOU SHOULD BE PREPARED TO BEAR. THE FIRST DECADE OF THE 21ST CENTURY SHOULD HAVE PROVEN THAT.

B. Do we recommend primarily a particular type of security:

We may refer you to a TPA who invest in primarily no-load asset-class, structured, or index funds. However, we may recommend other types of investments as appropriate for you 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 it. As noted above, investing in securities ALWAYS INVOLVES RISKS.

ITEM 9: DISCIPLINARY INFORMATION

A. Criminal or civil actions:

Inapplicable (none)

B. Administrative proceeding before The SEC or any other government agency
Inapplicable (none)

C. Any self-regulatory organization (SRO) proceedings
Inapplicable (none)

ITEM 10: OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

A. Are we registered representatives of a securities broker/dealer:
No one at Atlantis nor any of its associated persons is or has a pending application to be a securities broker/dealer or a securities registered representative.

B. Are we a futures commission merchant, commodity pool operator or a commodity trading advisor
No one at Atlantis nor any of its associated persons is or has a pending application to be a futures commission merchant, a commodity pool operator or a commodity trading advisor.

C. Do we have any other financial relationships or arrangements that are material to our business
Yes. Some of our adviser representatives, as individuals, are also licensed insurance agents in the Commonwealth of Puerto Rico, and in the States of Texas and Florida. They can sell insurance products for sales commissions, but not variable products such as variable annuities. Accordingly, you should be aware that a conflict exists between your interests and their interests; and you are under no obligation to act upon any of our or their recommendations; and if you elect to act upon any of the recommendations, you are under no obligation to implement the insurance transactions through them.

D. Do we recommend other registered investment advisers and receive compensation:
As noted in Item 5, Atlantis recommends other advisers (licensed or notice filed with the jurisdictions where we are registered) to our clients. We have chosen the other advisers based on their relative costs, skills, reputation, dependability and compatibility with our clients, and NOT upon any financial arrangement between them and Atlantis or Omar Pereira, other than they pay us up to 100% of the fee they charge you. It is basically a referral fee. (Please refer to Item 11-D.)

ITEM 11: CODE OF ETHICS, PARTICIPATION OR INTEREST IN *CLIENT* TRANSACTIONS AND PERSONAL TRADING

A. Describe our Code Of Ethics:
Our Code of Ethics establishes ideals for ethical conduct based upon fundamental principles of openness, integrity & trust. It ensures that we always put your interests first. We hold ourselves to high standards and diligence. Taken as a whole, our Code of Ethics is our promise to work hard in your interests, with complete confidentiality and honesty.

We will immediately provide a copy of our Code of Ethics to any client or prospective client upon request.

B. Do we have any material financial interests in investments we recommend:

We will not recommend an investment to you in which we have a material financial interest. We do not act as a principal and buy securities from or sell securities to clients. We are not general partners in a partnership, so we will not solicit your investments for such. We are not investment advisers to any investment company, so we will not solicit your investments for such. Our only financial affiliation is to our owner Omar Pereira Varela's insurance licenses, as disclosed before.

C. Do we invest in securities we recommend to you:

On occasion, our investment adviser representatives may buy or sell securities we recommend to you, but they only invest in pooled investment vehicles such as mutual funds, as we do not believe holding individual stocks or bonds is a prudent investment strategy. We have found over the years that clients like to invest in the same investments we do. That makes sense. If we like it for ourselves, why shouldn't our clients like it too, always depending on their investment goals, objectives and time frame. When we recommend investments we hold ourselves, we'll always disclose to you what we own and how much we own. (As an aside, we've seen that some salespeople tell clients that they own the same thing they are recommending, but it's often a minimal amount. We find that to be very deceptive.) We feel that there is no conflict of interest in owning the same securities as we recommend to you because the securities we recommend are mutual funds which are widely held and publicly traded, and we are too small advisors/investors to affect the market in widely held and publicly traded securities.

D. Do we buy or sell securities about the same time as you:

No. In addition, we do not allow "front running" (buying or selling before you) or buying or selling securities contemporaneously with you. And since the fees the other advisers charge vary somewhat, we cannot detail them here. Their fees will be fully disclosed when we describe money managers we feel would be appropriate for you. However, their fees (which may include our portion of the fee) will never exceed 2% per year. (Please refer to Item 10-D.)

ITEM 12: BROKERAGE PRACTICES

A. Describe the factors we used in selecting a custodian for you:

We have selected a custodian based on its:

- Costs: Among the best in the world of custodians
- Skills: Very few mistakes so far
- Reputation: Other RIAs that use them have sworn by them. That's really important.
- Dependability: Rarely a problem

1. Soft dollars:

We don't do "soft dollars". It is difficult to define, but a good example would be if a custodian offered us research or other benefits to place our clients with them.

2. Brokerage for client referrals:

We don't do "brokerage for client referrals". By that we mean we haven't selected our custodian on the basis that it will send us other client referrals in exchange for your custodial business.

3. Directed brokerage:

We don't do "directed brokerage". That means we don't recommend, request or require that you direct us to execute transactions through a specified broker/dealer. If we did it, we may be unable to achieve favorable execution of trades and it would cost you money.

B. Aggregating client accounts:

We do not manage our clients' portfolios, therefore, we do not get involved in aggregation of client accounts.

ITEM 13: REVIEW OF ACCOUNTS

A. Frequency & nature of reviews:

Omar Pereira, Managing Member, will monitor client accounts on at least an annual basis to ensure the advisory services provided to you are consistent with your investment needs and objectives. Triggering factors that may stimulate additional reviews include, but are not limited to, significant market corrections, large deposits or withdrawals from an account, a change in your financial condition, or your request for an additional review, which you can make at any time.

You will receive statements directly from your account custodian(s) on at least a quarterly basis. The other advisers will also issue reports on at least a quarterly basis.

B. Reviews on an other-than-periodic basis:

On occasions, such as a dramatic market move (in either direction), retirement or any catastrophe, we may review client accounts to ascertain if we need to make any recommendations to you.

C. Client reports:

We do not prepare regular client *reports*. Your custodian sends you account statements, transaction confirmations, all applicable tax documents, required minimum distributions from any qualified plans, and proxy documents, including ballots and any communication from public companies. In addition, you also receive statements from any mutual funds you may own and other money managers you may utilize.

ITEM 14: CLIENT REFERRALS AND OTHER COMPENSATION

A. Do we get economic benefits from a non-client for providing certain advice to you:

No. In addition, we do not accept sales awards or other prizes, such as trips. We pay for our own trips.

B. Do we pay for client referrals:

We do not *pay* for client referrals. We do *get paid* for client referrals, when we recommend other money managers to you that follow the investment philosophies and strategies we teach you. (Please refer to item 10-D.)

ITEM 15: CUSTODY

We do not directly debit advisory fees from your account and we do not exercise custody over your funds or securities. Your funds and securities will be held with a bank, broker-dealer, or another independent, qualified custodian. If you have a question regarding your account statement or if you did not receive a statement from your custodian, please contact your custodian directly.

ITEM 16: INVESTMENT DISCRETION

We do not have discretion over your investments.

ITEM 17: VOTING CLIENT SECURITIES

A. Do we accept authority to vote client securities:

We do not vote client securities. We will not vote proxies on behalf of your advisory accounts. 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 are responsible for exercising your right to vote as a shareholder.

B. If we do not have that authority, disclose that fact:

We do not have the authority to vote client securities. You will receive your proxies or other solicitations directly from your custodian and we encourage you to discuss them with your legal representatives as we not in a position to answer any of your questions regarding proxies.

ITEM 18: FINANCIAL INFORMATION

A. Do we require prepayment of fees of more than \$500/ more than 6 months in advance:

No, we never charge more than \$500 for services to be rendered more than 6 months in advance.

B. If we require such prepayment, or have custody or discretion, is there any impairment for us to make a refund, if necessary:

We are not required to provide financial information to our clients because **we do not:**

- require the prepayment of more than \$500 in fees and six or more months in advance, or
- take custody of client funds or securities, or
- have a financial condition that is reasonably likely to impair our ability to meet our commitments to you.

C. Bankruptcy

Neither Omar Pereira, nor Atlantis Investment Coaching, LLC has ever filed for bankruptcy.

ITEM 19: REQUIREMENTS FOR STATE REGISTERED ADVISORS

A. Our education & business backgrounds:

The principal officer of Atlantis Investment Coaching, LLC is Omar Pereira.

Omar Pereira, our Managing Member, has been president of Atlantis Investment Coaching, LLC, a Registered Investment, since 2007. He is also an independent insurance agent since 2002. He graduated from high school from Colegio San Ignacio de Loyola in San Juan, PR. and obtained his BS in electrical engineering from Rensselaer Polytechnic Institute in Troy, NY. He also obtained his Masters in Business Administration from the University of New Orleans. While he was studying in college towards his Bachelor's Degree, and after graduation, he worked at General Motors Corporation where he held a variety of positions in various locations in the US, Brazil and Europe during his 14 year career. He returned to Puerto Rico in 2001 and shortly thereafter became a registered representative, investment advisor representative, and branch manager of Jefferson Pilot Securities, a broker/dealer (2002 to 2007). He is also an independent insurance agent (2002 to present). In 2008, he founded Earthshine Corp. with two other friends, where he serves as its President and CEO. Earthshine Corp. plans, develops and implements innovative equipment and services solutions for infrastructure projects throughout the Caribbean. Also in 2008, he founded Sunshine Property Management, LLC, a property management firm, where he serves as its Managing Member. Omar has never had any legal or disciplinary events.

B. Any other business activities:

Omar Pereira has other business activities:

Omar Pereira (also known as Omar Pereira Varela) sells insurance products for sales commissions. That profession takes up about 10% of his workweek. Omar also serves as President and CEO of Earthshine Corp and Seanergy LLC. Those activities take on average about 20% of his workweek. Omar serves as Managing Member of Sunshine Property Management, LLC, and this activity takes on average about 3% of his workweek. Omar also manages his wife's practice, and that activity takes on average about 5% of his workweek.

C. Performance-based fees:

Atlantis does not charge performance-based fees.

D-1. Arbitration:

Omar Pereira has never been involved in *arbitration* of any kind.

D-2. Civil or administrative proceedings:

Omar Pereira has never been found liable in a *civil, self-regulatory organization, or administrative proceeding* of any kind.

E. Relationship with issuer of securities:

We do not have any relationships with issuers of securities

ITEM 20: ADDITIONAL INFORMATION

A. Your Privacy:

We view protecting your private information as a top priority. Pursuant to applicable privacy requirements, we have instituted policies and procedures to ensure that we keep your personal information private and secure.

We do not disclose any nonpublic personal information about you to any nonaffiliated third parties, except as permitted by law. In the course of servicing your account, we may share some information with our service providers, such as transfer agents, custodians, broker-dealers, accountants, consultants, and attorneys.

We restrict internal access to nonpublic personal information about you to employees, who need that information in order to provide products or services to you. We maintain physical and procedural safeguards that comply with regulatory standards to guard your nonpublic personal information and to ensure our integrity and confidentiality. We will not sell information about you or your accounts to anyone. We do not share your information unless it is required to process a transaction, at your request, or required by law.

You will receive a copy of our privacy notice prior to or at the time you sign an advisory agreement with our firm. Thereafter, we will deliver a copy of the current privacy policy

notice to you on an annual basis. Please contact our main office at the telephone number on the cover page of this brochure if you have any questions regarding this policy.

B. Class Action Lawsuits:

We do not determine if securities held by you are the subject of a class action lawsuit or whether you are eligible to participate in class action settlements or litigation nor do we initiate or participate in litigation to recover damages on your behalf for injuries as a result of actions, misconduct, or negligence by issuers of securities held by you. If you desire, we may serve as advisors to you in the event you need investment advice related to your claim, and/or serve as an expert witness during the proceedings.

Part 2B of Form ADV: Brochure Supplement for Omar Pereira

Item 1 Cover Page

Atlantis Investment Coaching, LLC

Office Address:
District View The Work Place
450 Ave De La Constitucion Ste 200
San Juan, PR 00901-2317
(787) 919-7314

Websites: <https://atlantiscoaching.com> & <https://atlantis.breakthroughinvesting.com>

Facebook: <https://www.facebook.com/savinginvestors>

Twitter: <https://twitter.com/savinginvestors>

Instagram: <https://www.instagram.com/atlantiscoaching>

Email: info@atlantiscoaching.com

April 5, 2023

This brochure supplement provides information about Omar Pereira that supplements the Atlantis Investment Coaching, LLC brochure. You should have received a copy of that brochure. Please contact Omar Pereira, Managing Member of Atlantis Investment Coaching, LLC at 787-919-7314 if you did not receive Atlantis Investment Coaching's brochure, or if you have any questions about the contents of this supplement.

Additional information about Omar Pereira is available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for Omar Pereira is 4517833.

Item 2 Educational Background and Business Experience

Omar Pereira, our Managing Member, has been President of Atlantis Investment Coaching, LLC, a Puerto Rico and Texas Registered Investment Advisor since 2007. He is also an independent insurance agent (2002 to present). He obtained his BS in electrical engineering from Rensselaer Polytechnic Institute in Troy, NY. He also received a Masters in Business Administration from the University of New Orleans. While he was studying for his Bachelor's Degree in college, and after graduation, he worked at General Motors Corporation where he held a variety of positions in various locations in the US, Brazil and Europe during his 14 year career. He returned to Puerto Rico in 2001 and shortly thereafter became a registered representative, investment advisor representative,

and branch manager of Jefferson Pilot Securities, a broker/dealer (2002 to 2007). Omar Pereira (also known as Omar Pereira Varela) is also an independent insurance agent (2002 to present). In 2008, he founded Earthshine Corp. with two other friends, where he serves as its President and CEO. Earthshine Corp. plans, develops and implements innovative equipment and services solutions for infrastructure projects throughout the Caribbean. In 2008, he founded Sunshine Property Management, LLC, a property management firm, where he serves as its Managing Member. Omar has never had any legal or disciplinary events.

Item 3 Disciplinary Information

- A. Criminal or civil action in domestic, foreign or military court:** Not applicable.
- B. Administrative proceeding before the SEC or any other federal or state regulatory agency:** Not applicable.
- C. Proceeding before a self-regulatory organization (SRO):** Not applicable.
- D. Proceeding in which professional attainment, designation or license was revoked or suspended:** Not applicable.

Item 4 Other Business Activities

- A. Actively engaged in any investment related business or occupation:** Not applicable.
- B. Actively engaged in any other business or occupation:** Omar Pereira has other business activities:

Omar Pereira (also known as Omar Pereira Varela) sells insurance products for sales commissions. That profession takes up about 10% of his workweek. Omar also serves as President and CEO of Earthshine. That activity takes on average about 10% of his workweek. Omar serves as Managing Member of Sunshine Property Management, LLC, and this activity takes on average about 1% of his workweek. Omar also manages his wife's practice, and that activity takes on average about 5% of his workweek.

Item 5
Additional compensation

Does Omar Pereira get an economic benefit from a non-client for providing advisory services:

No.

Item 6
Supervision

Atlantis Investment Coaching, LLC employees are supervised by Omar Pereira.

Item 7
Requirements for State Registered Advisors

A. Has Omar Pereira been involved in

1. **An arbitration claim alleging damages in excess of \$2,500:** No.
2. **Being found liable in a civil, SRO or administrative proceeding.** No.

B. Bankruptcy. No.

Atlantis Investment Coaching, LLC

PRIVACY POLICY

How Atlantis Investment Coaching, LLC (“Atlantis”) protects Clients’ (“Client”) personal information:

Atlantis Investment Coaching, LLC, takes precautions—including administrative, technical, and physical measures—to safeguard personal information against loss, theft, and misuse, as well as unauthorized access, disclosure, alteration, and destruction. We restrict access to Clients’ personally identifiable financial information (“Nonpublic Personal Information”) to employees who need to know that information in order to provide services to Client. Atlantis also maintains physical, electronic, and procedural safeguards to protect Clients’ non-public personal information.

Integrity of Clients’ personal information:

Atlantis has safeguards in place to keep Clients’ information complete and up to date. Only a select group of people have the ability to alter Clients’ data. Website access is strictly read-only; no changes can be made via the website.

Technologies:

The website that Clients may access is managed and maintained by Matson Money, Inc. (“Matson Money”). Their website, <http://www.MatsonMoney.com>, and our website, <https://atlantiscoaching.com>, are forced SSL sites (meaning all traffic is encrypted). Matson Money’s website does not allow saving of login information. Matson Money requests the username and password upon each login. Matson Money maintains an integral difference between what is contained in the database and what Client and Matson Money’s Authorized Representatives can access. Full database backups are performed every night. These backups are rotated on an abbreviated GFS scheme; translating into 6 tapes for daily backups, 2 tapes for weekly backups, and 1 tape for monthly backup. This is an industry standard approach modified for limited archival retrieve based on constantly changing data. Backups are encrypted on both disk and tape using 168-bit encryption. Go to <https://www.matsonmoney.com/Documents/mmprivacypolicy.pdf> to get a copy of Matson Money’s Privacy Policy.

Company-wide commitment to privacy of Clients:

Atlantis does not sell Clients’ personal information to anyone. Atlantis collects Nonpublic Personal Information from Clients from the following sources:

- Account applications and other forms, which may include an Client’s name, address, social security number, and information about the Client’s investment goals and risk tolerance.
- An Client’s professional advisors, such as an Client’s broker, financial planner, attorney, or accountant (an “Authorized Representative”), who may provide financial or investment history and tax information about the Client.
- History of account(s), including information about the transactions Atlantis has ordered for Client and balances in Client’s account(s).
- Correspondence, written or telephonic, between Client and Atlantis, or Client’s Authorized Representative, or custodian and Atlantis.

Atlantis does not disclose any Nonpublic Personal Information about Client to any entity that is not an affiliate of, or related by common ownership or affiliated by corporate control (“Unaffiliated Third Party”) with Atlantis, except as permitted or required by law. Accordingly, Atlantis may disclose all of the information Atlantis collect about the Client or the Client’s account(s), as described above, under the following circumstances:

- Atlantis receives an Client’s prior consent.
- Atlantis believes the recipient to be an Client’s Authorized Representative.
- The recipient is an Authorized Representative, custodian, or other service provider with whom we must share information in order to manage or service an Client’s account properly.
- The recipient is an Unaffiliated Third Party that performs marketing services on Atlantis’s behalf, and
- Atlantis is required by law to release the information to the recipient.

Atlantis will only use information about Client and Client’s account(s) to:

- Service Client’s investment and financial needs.
- Manage and service Client’s account(s).
- Administer Atlantis’s business.

Atlantis will adhere to the policies and practices described in this policy whether Client is a current or non-current Client of Atlantis.

Atlantis Investment Coaching, LLC

PRIVACY POLICY

FACTS	WHAT DOES ATLANTIS DO WITH YOUR PERSONAL INFORMATION?
Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
What?	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include</p> <ul style="list-style-type: none"> • Social Security number and income • Account balances and payment history • Credit history and credit scores <p>When you close your account, we continue to share information about you according to our policies.</p>
How?	All financial companies need to share customers' personal information to run their everyday business—to process transactions, maintain customer account, and report to credit bureaus. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Atlantis chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Atlantis Share?	Can you limit this sharing?
For our everyday business purposes: to process your transactions, maintain your account, and report to credit bureaus	Yes	No
For our marketing purposes: to offer our products and services to you	No	We don't share
For joint marketing with other financial companies	No	We don't share
For our affiliates' everyday business purposes: information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes: information about your creditworthiness	No	We don't share
For our affiliates to market to you	No	We don't share
For non-affiliates to market to you	No	We don't share

Contact Us	info@atlantiscoaching.com
-------------------	--