

Title: Investigating Brazilian puts: possibly debunked? Primary data source and my research to date - need more wrinkly ape eyes ■ ■ on this

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https://www.reddit.com/r/DDintoGME/comments/pmcc8u/investigating_brazilian_puts_possibly_debunked/

I started digging on the Brazilian puts a month or so ago [when they were first identified](https://www.reddit.com/r/Superstonk/comments/ovaorq/credit_suisse_put_options_540k_gone_in_bloomberg). These were associated with several investment managers including Conastancia Investimentos and Kapitalo Investimentos. I couldn't find anything definitive, Bloomberg said they were a "glitch", and so I set that research aside to focus on other things. With the recent reemergence of [Brazilian puts through another investment manager, JGP Global](https://www.reddit.com/r/Superstonk/comments/plxc2m/bloomberg_terminal_released_45m_shares_hiding_in/), I decided to investigate again, because this smells real fishy. These data points don't just appear out of thin air, there must be a primary source we can check. And if it was just a glitch wouldn't Bloomberg have fixed it?

I still don't have any definitive findings, but wanted to present the best data source for researching Brazilian fund holdings I have found, in case other apes can help. This is a step-by-step guide to finding Brazilian investment funds and their reported holdings.

FYI I am US-based, have no idea how the Brazilian markets work, and don't speak Portuguese, so if anyone has more insights or I've incorrectly translated something (used Google Translate for this) please let me know.

Brazilian Fund Holdings: Step-by-Step

Go to [COMISSÃO DE VALORES MOBILIÁRIOS](<http://sistemas.cvm.gov.br/>) (Brazil's Securities Commission). This appears to be the Brazilian equivalent of the US SEC. Note: they also have an [Open Data Portal](<https://www.gov.br/cvm/pt-br/aceso-a-informacao-cvm/dados-abertos>) but I've not been able to find security-level investment holdings on here. Click on "Fundos de Investimento" (Investment Funds).

<https://preview.redd.it/o9k006g2ywm71.png?width=1025&format;=png&auto;=webp&s;=769c2865ea573e6cbbef4102b12341804669291c>

Now, select "Fundos Registrados" (Registered Funds)

<https://preview.redd.it/byg27yz3ywm71.png?width=582&format;=png&auto;=webp&s;=cf781aa118cf5fcff51236fd24c667c951cd34d8>

This brings you to a basic search page titled [Consulta Consolidada de Fundo](https://cvmweb.cvm.gov.br/SWB/default.asp?sg_sistema=fundosreg) (Consolidated Background Consultation). In the text box type the name of the investment manager/fund you're looking for (partial name is fine), and in this case let's use the recently see 'JGP' fund. Leave the drop down as "Todos" (Everybody) so we can see all types of results. Click 'Continuar >'.

<https://preview.redd.it/u94ujga7ywm71.png?width=847&format;=png&auto;=webp&s;=0cefddcd4e8c4d606d5790008bf5950fe1e55662>

This brings up a long list of funds. Let's find the first one from the latest Bloomberg drop, which begins with "JGP STRATEGY MASTER FU..." There is a "JGP STRATEGY MASTER FUNDO DE INVESTIMENTO MULTIMERCADO" which is the only fund name that appears to match, click on that.

<https://preview.redd.it/s61nxgf9ywm71.png?width=1055&format;=png&auto;=webp&s;=a571475b6c9d9914847561501cd7dc57e074d591>

We are taken to a summary page about this fund, and can see for example that BNY Mellon is the

administrator. There is a section at the bottom titled "Documentos Associados" (Associated Documents). Click on "[Composição da Carteira](https://cvmweb.cvm.gov.br/SWB/Sistemas/SCW/CPublica/CDA/CPublicaCDA.aspx?PK_PARTIC=116157&SemFrame;=)" (Portfolio Composition).

<https://preview.redd.it/fbhszlzwaywm71.png?width=1370&format;=png&auto;=webp&s;=40d20ee79a1165f9ca21fc08724b2dc90732ca2c>

Here the site starts to slow down. You may need to wait a minute for the page to load. You will be taken to another page summarizing the portfolio composition. The amounts are summarized by type of investment.

<https://preview.redd.it/xdt7ukcywm71.png?width=1411&format;=png&auto;=webp&s;=88be826b68adae3350e8f1d5203cfc38ba2b2394>

It's important to note the date of this report. You'll see a drop down next to the word "Competência" (Competence?). This appears to be the month end of the report, i.e. it has defaulted to the month end of August 2021. From what I gather, based on the title of the table of holdings, the info for this month is still confidential. "Por solicitação do administrador do fundo, a identificação dos seguintes ativos foi omitida ao público em geral. Clique sobre o ativo para mais informações." (At the request of the fund manager, the identification of the following assets was withheld from the general public. Click on the asset for more information.)

<https://preview.redd.it/dcrke61fywm71.png?width=405&format;=png&auto;=webp&s;=0dd3f55377861b87c0d421a4b552a0710df91dde>

All is not lost. It appears after 3 months that the information becomes public. I assume this is why the Bloomberg data shows an as of filing date of 5/31/21. (*sidenote: I'm impressed Brazil has their funds report holdings on a monthly basis. SEC wut doin?*) Let's select '05/2021' from the dropdown and give the page a minute to reload.

<https://preview.redd.it/30dkg92hywm71.png?width=1433&format;=png&auto;=webp&s;=adb97d17b59249c5a35914e7cd3743945cf88a81>

Boom, way more data. These appear to be sorted by "Ativo" (Active) which appears to mean investment type. I'm not going to go through all the types and columns but the "Negócios Realizados no Mês" (Business Carried Out in the Month) shows the quantity and value of "Vendas" (Sales) and "Aquisições" (Acquisitions). The set of columns to the far right, "Posição Final" (Final Position) also provides quantity and "Mercado" (Market) value.

Scroll down and you see the records start with things like and "Mercado Futuro - Posições vendidas" (Futures Market - Short Positions) and "Obrigações por ações e outros TVM recebidos em empréstimo" (Bonds for shares and other securities received on loan). So they actually show short positions and derivatives -- awesome! I've not looked into these because I was looking for options, which are the records starting with "Opções - Posições lançadas" (Options - Positions posted).

<https://preview.redd.it/so6k47jpywm71.png?width=621&format;=png&auto;=webp&s;=49721f1f3a48535a161b5ac2f405facd267490f3>

Let's go through the four lines of this first options position with the red arrow pointing to it to see what they mean.

- * Opções - Posições lançadas (Options - Positions posted)
- * Descrição (Description): OPD DOL/QPDJ
- * CNPJ do emissor (Issuer's CNPJ): 54.641.030/0001-06
- * Denominação Social do emissor (Issuer's corporate name): BOLSA MERCADORIAS FUTUROS BMF SA

Pretty straightforward. CNPJ is an identifier, we'll get to that later. This doesn't tell you whether it's a call or put so click on any of the four lines and we can get more info. A box appears but it's all the way at the top of the page, so scroll up. (I'm using Chrome, maybe it's different in another browser).

<https://preview.redd.it/w615oz6uywm71.png?width=552&format;=png&auto;=webp&s;=3d1b3755f1bfdb7184a80e1ad77ddcc0f19b08c2>

Same info with the addition of one new line, "Tipo de Ativo" (Asset Type). For this position the value is "Opção de venda" (put option). Great - so they've got a put option on some Brazilian company. I expect the strike/expiration given is part of the description given it's an odd combo of letters, but I'm not sure. Click "Fechar" to close the info box.

If we keep looking some of the descriptions of their options positions do appear to contain an expiration date, searching for "18/06/2021", the expiration date of the puts Bloomberg shows, gives us some results.

<https://preview.redd.it/u46rcoi1zwm71.png?width=439&format;=png&auto;=webp&s;=3c00944d050fc1336a202c8582da1b23cab5d616>

Looking through these (there are 16 positions with 18/06/2021 in the description) none of the issuers appeared to be Gamestop. I also searched for the quantity of puts Bloomberg shows (41.1) and came up with two relevant results:

<https://preview.redd.it/96qeds53zwm71.png?width=1414&format;=png&auto;=webp&s;=c7796f4efa07d100935d1cc24ff018f4d40df9a6>

<https://preview.redd.it/54s7vso4zwm71.png?width=1415&format;=png&auto;=webp&s;=441d65671897b007282adce4cdcce1de1433af7c>

The first I'm not sure about, but the second one.... look at that description, it has a date in it: 18/06/2021. Spicy.

Click on it for more info:

<https://preview.redd.it/ozfsev46zwm71.png?width=446&format;=png&auto;=webp&s;=fb2cc78f39635e9ba295182ca1b88250ef2a46fd>

Option type is "Opção de venda", a put option. But it's not gamestop, its "NOTRE DAME INTERMEDICA PARTICIPACOES SA". Wtf is that? It appears to be a [Brazilian healthcare company](<https://www.reuters.com/companies/GNDI3.SA>).

<https://preview.redd.it/hxxpi9n7zwm71.png?width=612&format;=png&auto;=webp&s;=6da15b5e59bf95c74f574bfa70b023e4b15f5c8c>

The only other lead here is the CNPJ number, which I theorize may be what Bloomberg is using to associate these Brazilian company holdings to the underlying securities (e.g. Gamestop). Here is a [Brazilian government proof of enrollment/registration lookup](http://servicos.receita.fazenda.gov.br/Servicos/cnpjreva/Cnpjreva_solicitacao.asp) I found which, when searching this CNPJ 19.853.511/0001-84 shows the same Notre Dame entity.

<https://preview.redd.it/4k87qj49zwm71.png?width=895&format;=png&auto;=webp&s;=f539e161bae02549517202a0d264d3ee6d5bcc14>

Wrap up

What does this all mean? Are the Brazilian puts debunked? I am not sure. Working through this JGP example it might be the case that this particular Notre Dame put option holding was somehow associated with Gamestop. I just find it incredibly odd that this Bloomberg "glitch" is happening across multiple funds and periods. What are some other possibilities?

* The wrong entity was reported by fund for this position

* The other holding with a quantity of 41,100 is Gamestop (the "Cod. Ativo" is "CESP6", no idea wtf that

means)

* Some of these other holdings with less identifying information could be added together to come up with the full position shown on Bloomberg

I have also not been able to find a CNPJ number for Gamestop. As you saw, some of these records have less information than others, and there may be options which are some combo of letters and numbers that mean something in the Brazilian market, but I haven't been able to find a listing anywhere.

It would be great to have a database of these Brazilian market identifiers to better figure out what all these holdings are, especially the derivatives. Perhaps there is also way to search by security held, or a structured data download to search all entity holdings as of a certain month. I just haven't found anything better yet.

As you can see this is very tedious to look into these positions. I hope this helps others researching this Brazilian put phenomenon, and if you've got any leads please comment or DM.

Brick by brick. ■■■■■■