

Alveo Wealth Management, LLC

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This Brochure provides information about the qualifications and business practices of Alveo Wealth Management, LLC (“Alveo”). If you have any questions about the contents of this Brochure, please contact us at (561) 371-0135. 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.

Alveo is a Registered Investment Adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

Additional information about Alveo is also available on the SEC’s website at www.adviserinfo.sec.gov. The SEC’s web site also provides information about any persons affiliated with Alveo who are registered, or are required to be registered, as investment adviser representatives of Alveo.

Our Brochure may be requested by contacting Mr. Marian Stupka, Chief Compliance Officer at (561) 371-0135 or mstupka@alveowm.com

Item 2 – Material Changes

On November 6, 2015, we amended Item 4 of this Brochure to disclose assets under management of \$103,544,212.

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Item 4 – Advisory Business

Alveo Wealth Management, LLC (“Alveo”) is registered as an Investment Adviser in the State of Florida. Alveo is located in Miami, Florida since May 2013. Alveo is owned by AREG, LLC with Mr. Marian Stupka as the Compliance Officer.

Alveo will provide clients with an extensive array of products that allow them to efficiently access the international capital markets. Our full commitment to our clients eliminates conflicts of interest and ensures that decisions are geared exclusively to producing the best results.

At Alveo, we are committed to being a partner of choice and curating an exceptional suite of products chosen to fit the needs of clients. We are an open platform but give a full due-diligence review to each of the proposed products in a client’s portfolio, ensuring that it fits not only their investment profile but also our of investment fundamentals and management team screening.

Investment accounts are subject to the written investment guidelines and investment objectives (the "Investment Guidelines") as directed by each client and approved by Alveo. The Investment Guidelines may be amended from time to time by written notice from the client. Alveo recommends purchases and sales of domestic and foreign securities and instruments. We also offer Investment Consulting where a client can ask us to review, research, and give an opinion on a specific investment instrument, a specific investment process, or a specific investment portfolio that the client presents to us. Alveo provides this service as Investment Consulting. Investment Consulting can be charged as a fixed negotiated fee in mutual agreement with the client. Our other traditional consulting services include asset allocation, manager selection and portfolio structuring.

We intend to have majority of our clients be high net worth individuals from Latin America. We know how important it is to understand the unique needs and perspectives of these clients. Our value added approach offers the following advantages:

- ▶ A personalized boutique approach to navigating risks and opportunities.
- ▶ We structure each client’s investment portfolios according to an asset allocation model that takes into account their risk and return objectives.
- ▶ We emphasize a balanced approach to asset allocation, seeking to diversify the holdings by products, sectors and regions of the investments.
- ▶ Our open-architecture platform allows us to provide a global selection of financial products from a wide variety of financial institutions.

- ▶ We remain nimble to the changes in both the financial markets as well as to the personal circumstances of our clients.

We offer our clients a world of options through an open architecture investment platform.

FIXED INCOME

Fixed income products are an important component to a well-diversified portfolio. At Alveo, we develop many of our strategies are based on bond management techniques that focus on adding value while managing risks.

We offer a comprehensive range of fixed income products, including treasuries, government notes and bonds, corporate bonds, emerging market bonds, international sovereign bonds, and agency bonds.

EQUITIES & OPTIONS

Another core component to a well-diversified portfolio are global equity products. At Alveo, we provide market access to a wide range of financial instruments, such as listed U.S and International stocks, ETFs, equity and index options and ADRs.

MUTUAL FUNDS

Another important option to a well-structured portfolios is the addition of mutual funds and the inherent diversification they provide. Through our open-architecture we work with best-in-class fund managers with long, successful track records and a thorough grounding in risk management. We specialize in working with a comprehensive set of fund managers offering products with a unique set of benefits for international investors.

ASSETS UNDER MANAGEMENT

As of November 6, 2015, we manage discretionary assets under management of \$0 and non-discretionary assets under management of \$103,544,212.

Item 5 – Fees and Compensation

The specific manner in which fees are charged by Alveo is established in a client's written agreement with Alveo. All fees are subject to negotiation with each client.

For its advisory services, Alveo charges a management fee consisting of a percentage of the assets under management, and a performance fee consisted of a percentage of the profits over a benchmark for "Qualified Clients". Alveo can also charge a fixed fees for some of its clients. Fees for consulting services are fully negotiable depending on the type of consulting engagement desired and are written into each consulting contract. Our consulting services fees are typically a fixed fee and are billed monthly, quarterly or annually depending on the particular client. Fees are typically charged in arrears.

The fee will be billed in arrears and payable within 30 days after the end of each period. Fees will be prorated upon establishment of the Investment Account and upon termination of the Investment Account. Termination of the account shall be effective within fifteen days of receipt of written notice. Performance fees paid are not refundable. All accounts have a high water mark that last 12 consecutive months, measured either on a quarterly or semester basis.

Alveo stated charges for asset management is as follows:

2.00% of assets under management on an annual basis and a Performance Fee of 20% of the return in excess of agreed upon benchmark.

Fees are subject to individualized negotiation with each such client. The factors Alveo will consider in determining the appropriate fees for each client are the amount of assets, the anticipated time involved in structuring initial and ongoing recommendations to the client, and the types of expertise required for the client's portfolio. Alveo's advisors have the authority to negotiate the fee but are subject to the approval of the firm's Compliance Officer.

Alveo's fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses, which shall be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, third party investment and other third parties such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange-traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to Alveo's fee, and Alveo shall not receive any portion of these commissions, fees, and costs.

Item 12 further describes the factors that Alveo considers in selecting or recommending broker-dealers for *client* transactions and determining the reasonableness of their compensation (e.g., commissions)

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

Alveo enters into performance fee arrangements with qualified clients: such fees are subject to individualized negotiation with each such client. Losses must be made up prior to any new performance fees being charged following the high-water mark rules.

Alveo is structured subject to Section 205(a)(1) of the Investment Advisors Act of 1940 (The Advisors Act) in accordance with the available exemptions there under, including the exemption set forth in Rule 205-3. In measuring clients' assets for the calculation of performance-based fees, Alveo shall include realized and unrealized capital gains and losses. Performance based fee arrangements may create an incentive for Alveo to recommend investments that may be riskier or more speculative than those which would be recommended under a different fee arrangement. Such fee arrangements also create an incentive to favor higher fee paying accounts over other accounts in the allocation of investment opportunities. Alveo has procedures designed and implemented to ensure that all clients are treated fairly and equally, and to prevent this conflict from influencing the allocation of investment opportunities among clients. In addition, all accounts follow the same parameters and are not treated any differently whether they are performance-based or another type of fee.

Alveo does not perform side by side management.

Item 7 – Types of Clients

Alveo provides investment supervisory services and has investment advisory accounts for Individuals and High net worth individuals and corporations. All of Alveo's clients are Non-U.S residents with a concentration of Latin American clients.

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

“Investing in securities involves risk of loss that clients should be prepared to bear.”

Our open-architecture platform allows clients to select products from multiple providers. In line with our investment methodology, we provide our clients with customized investment strategies that incorporate a wide mix of products from the best financial firms in the world.

Alveo uses the following methods of analysis: fundamental analysis and charting which includes technical and cyclical analysis. Charting analysis involves the use of patterns in performance charts. Alveo uses this charting technique to search for patterns used to help predict favorable conditions for buying and/or selling a security. Fundamental analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages. Technical analysis involves the analysis of past market data; primarily price and volume. Cyclical analysis involved the analysis of business cycles to find favorable conditions for buying and/or selling a security.

Alveo uses long term and short term purchasing strategies, designed to capture market rates of both return and risk. Frequent trading, when done, can affect investment performance, particularly through increased brokerage and other transaction costs and taxes. Investing in securities involves a risk of loss that clients should be prepared to bear.

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 Alveo or the integrity of Alveo's management. There is no disciplinary information pertaining to Alveo Wealth Management. For disciplinary information about a particular investment advisor, see each investment advisors representative ADV 2b.

Item 10 – Other Financial Industry Activities and Affiliations

Alveo does not have any financial industry affiliates. Some advisers may be dually registered with a FINRA Broker Dealer. See each Advisor's Supplement to view which Broker Dealer they are registered with, if applicable.

Item 11 – Code of Ethics

Alveo has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at Alveo must acknowledge the terms of the Code of Ethics annually, or as amended.

Alveo anticipates that, in appropriate circumstances, consistent with clients' investment objectives, it will cause accounts over which Alveo has management authority to effect, and will recommend to investment advisory clients or prospective clients, the purchase or sale of securities in which Alveo, its affiliates and/or clients, directly or indirectly, have a position of interest.

Alveo's employees and persons associated with Alveo are required to follow Alveo's Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors and employees of Alveo and its affiliates may trade for their own accounts in securities which are recommended to and/or purchased for Alveo's clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of Alveo will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code, certain classes of securities have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of Alveo's clients. In addition, the Code requires pre-clearance of many transactions, and restricts trading in close proximity to client trading activity. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics, and to reasonably prevent conflicts of interest between Alveo and its clients.

Alveo's clients or prospective clients may request a copy of the firm's Code of Ethics by contacting Marian Stupka, the Chief Compliance Officer.

It is Alveo's policy that the firm will not affect any principal or agency cross securities transactions for client accounts. Alveo will also not cross trades between client accounts. Principal transactions are generally defined as transactions where an adviser, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to any advisory client. A principal transaction may also be deemed to have occurred if a security is crossed between an affiliated hedge fund and another client account. An agency cross transaction is defined as a transaction where a person acts as an investment adviser in relation to a transaction in which the investment adviser, or any person controlled by or under common control with the investment adviser, acts as broker for both the advisory client and for another person on the other side of the transaction. Agency cross transactions may arise where an adviser is dually registered as a broker-dealer or has an affiliated broker-dealer.

Item 12 – Brokerage Practices

Alveo clients can choose where they would want to hold their assets. Alveo may assist clients in negotiating fees and choosing the bank/institution that will best serve the client's interest for custody and execution. Alveo does not benefit or receive any compensation based upon any discounts that Alveo negotiates. The final decision of choosing custodians is always with the client.

Alveo does not have any soft dollar arrangements.

Item 13 – Review of Accounts

Alveo's Investment philosophy reviews each of the following objectives with each client to communicate and manage client's expectations.

- Strategy
The portfolio manager meets with the client to set the asset management strategy and allocation model
- Opportunities
Based on asset allocation model, the portfolio manager then identifies appropriate investment opportunities
- Due Diligence
Due diligence is conducted by the portfolio manager on selected investments and adjustments made, if necessary
- Review
All partners review investment recommendations and due diligence to ensure compatibility with client investment strategy before making final recommendations to the client
- Performance
Investment performance is internally reviewed periodically and with client in response to changes in asset management strategy

Alveo monitors its managed accounts on a systematic basis. Marian Stupka, Chief Compliance Officer will review each account at the least quarterly. More active accounts and larger accounts may be reviewed on a daily basis. More frequent reviews may be undertaken because of change in market conditions, change of security position(s), requests by clients for a meeting or the occurrence of such meeting, change in client's investment objective or policies of Alveo. With respect to account performance, Alveo reviews each account on a quarterly basis.

More frequent reviews may be undertaken because of changes in market conditions, change of security position(s), request by client for a meeting or the occurrence of such meeting, change in client's investment objective or policies of Alveo.

Item 14 – *Client* Referrals and Other Compensation

Currently, Alveo does not directly or indirectly compensate any person for client referrals. In addition, no representatives has an arrangement where he/she is paid cash by or receives some economic benefit from a non client in connection with giving advices to clients.

However, Alveo may determine from time to time to engage in a solicitor's agreement whereby it does pay for referral fees but only to organizations that are registered with FINRA, others state or SEC Registered Investment Advisers or foreign broker dealers foreign investment advisor and other professionals from their own local jurisdiction. If Alveo pays a solicitor fee it will only be permitted under the following circumstances:

1. There is a written agreement between the advisor and the solicitor
2. Alveo provides any prospective customer with its disclosure materials.
3. The prospective customer has received disclosure material directly from Alveo including all of the facts about the compensation arrangement between the adviser and the solicitor.
4. The prospective customer has verified in writing that all of the required disclosures have been made and has received the disclosures regarding solicitor's compensation.

Item 15 – Custody

Alveo does not act as a custodian for its clients. Clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. Alveo urges you to carefully review such statements and compare such official custodial records to the account statements that we may provide to you. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Item 16 – Investment Discretion

Alveo usually receives discretionary authority from the client at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account.

When selecting securities and determining amounts, Alveo adheres to the investment policies, limitations and restrictions of the clients for which it advises. For registered investment companies, Alveo's authority to trade securities may also be limited by certain federal securities and tax laws that require diversification of investments and favor the holding of investments once made.

Changes in the investment guidelines and restrictions must be provided to Alveo in writing.

Item 17 – Voting *Client* Securities

As a matter of firm policy and practice, Alveo does not have any authority to and does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. Alveo may provide advice to clients regarding the clients' voting of proxies.

Item 18 – Financial Information

Alveo Wealth Management has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

Item 19 – Requirements for State-Registered Advisers

Not Applicable