

# **Alveo Wealth Management, LLC**

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**September 24, 2018**

## **Form ADV Part 2A Brochure**

This Brochure provides information about the qualifications and business practices of Alveo Wealth Management, LLC. 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 ("SEC") or by any state securities authority.

Alveo Wealth Management, LLC is an investment adviser registered with the SEC. 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.

Additional information about Alveo Wealth Management, LLC is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Item 2 - Material Changes**

The purpose of this page is to inform you of any material changes since the previous version of this brochure.

On February 13, 2018, we submitted our annual updating amendment for fiscal year 2017 and amended Item 4 of our Form ADV Part 2A Brochure to reflect discretionary assets under management of \$0 and non-discretionary assets under management of \$140,230,161.

We review and update our brochure at least annually to make sure that it remains current.

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#### **Item 4 - Advisory Business**

Alveo Wealth Management, LLC (hereinafter “Alveo” or the “firm”) is a registered investment adviser based in Miami, Florida. We are a limited liability company under the laws of the State of Florida. We have been registered as an investment adviser since 2013. AREG, LLC is the sole owner of Alveo. Arturo A. Barragan is the Managing Member and sole owner of AREG, LLC. Marian Stupka is the Chief Compliance Officer of Alveo.

You may see the term, Associated Person, used 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. Where required, such persons are properly registered as investment adviser representatives.

#### **Portfolio Management Services**

Our firm offers discretionary and non-discretionary portfolio management services to our clients. Discretionary portfolio management means we will make investment decisions and place buy or sell orders in your account without contacting you. These decisions would be made based upon your stated investment objectives. Non-discretionary portfolio management service means that we must obtain your approval prior to making any transactions in your account.

Our investment advice is tailored 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, determine 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 that will be specific to your goals, whether we are actively investing for you or simply providing you with advice.

Alveo mainly uses domestic and international equity securities, corporate debt securities, municipal debt securities, certificates of deposit, exchange traded funds, mutual funds, closed end funds, U.S. government securities and options in its portfolio management programs.

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.

We recommend that you review the statement(s) you receive from the qualified custodian. Please call our office number, located on the cover page of this brochure, if you have any questions about your statement.

#### **Assets Under Management**

As of December 31, 2017, we have \$0 in discretionary and \$140,230,161 in non-discretionary assets under management.

## **Item 5 - Fees and Compensation**

### **Portfolio Management Services Fees**

For portfolio management services, Alveo charges an annual fee based upon a percentage of the market value of the assets being managed. Our asset based fees range from 0.20% to 1.50% of account value, payable on a daily, monthly or quarterly basis. The fee is negotiable depending upon the complexity of the client's financial situation and the scope of services rendered and will be clearly disclosed in the advisory agreement signed by the firm and the Client. In limited circumstances, the advisory fee may include a project based fixed fee that will also be listed on the advisory agreement.

Alveo will either invoice the client directly for management fees or payment will be made by the qualified custodian. We will only receive payment from the custodian if the client supplies written authorization permitting the fees to be paid directly from the account. Alveo will not have access to client funds for payment of fees without written consent by the client. Further, the qualified custodian agrees to deliver an account statement, at least quarterly, directly to the client, showing all disbursements from the account. The client is encouraged to review all account statements for accuracy. Alveo will receive a duplicate copy of the statement that was delivered to the client. In situations where the statements provided by the qualified custodian do not adequately reflect the fees paid to the firm, Alveo will send a separate billing invoice.

For the initial period of investment management services, the first period's fees will be calculated on a pro-rata basis. The Advisory Agreement between Alveo and the Client will continue in effect until either party terminates the Agreement upon a 30 days' notice to the other party. Refunds are not applicable because fees are payable in arrears.

### **Additional Fees and Expenses**

Alveo's fees may be negotiable based on the amount of assets under management, complexity of client goals and objectives, and scope of services rendered.

All fees paid to Alveo for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds or exchange traded funds to their shareholders. 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, a client may pay an initial or deferred sales charge. We generally seek to avoid funds with sales charges. However, some funds may have early redemption fees if sold prior to the expiration of their holding periods.

A client could invest in a mutual fund directly, without the services of Alveo. In that case, the client would not receive the services provided by Alveo which are designed, among other things, to assist the client in determining which mutual fund or funds are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the funds and the fees charged by Alveo to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

Advisory recommendations are based on your financial information and situation disclosed to us at the time the services are provided. We may make certain assumptions with respect to interest and inflation

rates and the use of past trends and performance of the market and economy. Past performance is in no way an indication of future results. As your financial situation, goals, objectives, or needs change, you must notify us promptly.

All conflicts of interest between you and our firm, and the Associated Persons of our firm, are outlined in this Disclosure Brochure. If additional conflicts arise in the future, we will notify you in writing or supply you with an updated Disclosure Brochure.

#### **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. 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. We do not accept performance-based fees or participate in side-by-side management. Our fees are calculated as described in the Fees and Compensation section above, and are not charged on the basis of a share of capital gains upon, or capital appreciation of, the funds in your advisory account(s).

#### **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.

We do not require a minimum investment to open and maintain an advisory account. However, our typical client has over \$5,000,000 in assets under management at our firm.

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

The following are different methods of analysis that we may use when providing you with investment advice:

- Charting – charting is a technique that attempts to forecast future market moves by studying historical data on charts.
- 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.

- **Technical Analysis** – technical analysis is a technique that relies on the assumption that current market data (such as charts of price, volume, and open interest) can help predict future market trends, at least in the short term. It assumes that market psychology influences trading and can predict when stocks will rise or fall.

We may use one or more of the following investment strategies when advising you on investments:

- **Long Term Purchases** – securities held for over a year.
- **Short Term Purchases** – securities held for less than a year.
- **Trading** – securities are sold within 30 days.
- **Option Writing** – an option is the right either to buy or sell a specified amount or value of a particular underlying investment instrument at a fixed price (i.e. the “exercise price”) by exercising the option before its specified expiration date. Options giving you the right to buy are called “call” options. Options giving you the right to sell are called “put” options. When trading options on behalf of a client, we may use covered or uncovered options. Covered options involve options trading when you own the underlying instrument on which the option is based. Uncovered options involve options trading when you do not own the underlying instrument on which the option is based. We primarily used uncovered options as a hedge.

The investment advice provided along with the strategies suggested by Alveo will vary depending on each client’s specific financial situation and goals. **Investing in securities involves risk of loss that clients should be prepared to bear.** This brief statement does not disclose all of the 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 many members of the public. You should carefully consider whether the strategies employed will be appropriate for you in light of your experience, objectives, financial resources and other relevant circumstances.

**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 many members of the public. 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 you intend to invest in.

**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.

**Risks Associated with Investing in Options:** Transactions in options carry a high degree of risk. A relatively small market movement will have a proportionately larger impact, which may work for or against the investor. The placing of certain orders, which are intended to limit losses to certain amounts, may not be effective because market conditions may make it impossible to execute such orders. Selling ("writing" or "granting") an option generally entails considerably greater risk than purchasing options. Although the premium received by the seller is fixed, the seller may sustain a loss well in excess of that amount. The seller will also be exposed to the risk of the purchaser exercising the option and the seller will be obliged either to settle the option in cash or to acquire or deliver the underlying investment. If the option is "covered" by the seller holding a corresponding position in the underlying investment or a future on another option, the risk may be reduced.

#### Item 9 - Disciplinary Information

Alveo and its officers and employees do not have legal or disciplinary events to disclose.

#### Item 10 - Other Financial Industry Activities or Affiliations

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



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

##### **Description of Our Code of Ethics**

Alveo 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 Alveo's policies and procedures developed to protect clients' 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.
- 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 kept confidential; and
- The principle that independence in the investment decision-making process is paramount.

A copy of Alveo's Code of Ethics is available upon request to Marian Stupka, the Chief Compliance Officer, at the telephone number listed on the cover page of this Brochure.

##### **Personal Trading Practices**

At times Alveo and/or its Advisory Representatives may take positions in the same securities as clients, which may pose a conflict of interest with clients. Alveo and its Advisory Representatives will generally be "last in" and "last out" for the trading day when trading occurs in close proximity to client trades. We will not violate our fiduciary responsibilities to our clients. Front running (trading shortly ahead of clients) is prohibited. Should a conflict occur because of materiality (i.e. a thinly traded stock), disclosure will be made to the client(s) at the time of trading. Incidental trading not deemed to be a conflict (i.e. a purchase or sale which is minimal in relation to the total outstanding value, and as such would have negligible effect on the market price), would not be disclosed at the time of trading.

#### **Item 12 - Brokerage Practices**

Our clients determine the financial institution to use for brokerage and custodial services. In these situations, it is up to the client to negotiate the custodial fees and/or commission rates, as Alveo will not. The client may not be able to negotiate the most competitive rate. As a result, the client may pay more than the rate available through the United States based broker dealer/custodian recommended by the firm.

##### **Research and Other Soft Dollar Benefits**

We are independently owned and operated and do not receive fees or commissions from any custodian or broker-dealer. We may receive additional benefits from broker dealers such as electronic delivery of client information, electronic trading platforms, institutional trading support, proprietary and/or third party research and other services provided by custodians for the benefit of investment advisory clients.

**Brokerage for Client Referrals**

We do not receive client referrals from custodians or broker-dealers in which we have an institutional advisory arrangement. Also, we do not receive other benefits from custodians or broker-dealers in exchange for client referrals.

**Directed Brokerage**

Clients may direct brokerage to a specified broker/dealer other than the firm recommended by Alveo. It is up to the client to negotiate the commission rate, as Alveo will not. The client may not be able to negotiate the most competitive rate. As a result, the client may pay more than the rate available through the broker/dealer used by Alveo. Where the client does not otherwise designate a broker/dealer, Alveo recommends a broker/dealer with competitive commission rates.

**Trade Aggregation**

While individual client advice is provided to each account, client trades can be executed as a block trade. No advisory account within the block trade will be favored over any other advisory account, and thus, each account will participate in an aggregated order at the average share price and receive the same commission rate. The aggregation should, on average, reduce slightly the costs of execution. We will not aggregate a client's order if in a particular instance we believe that aggregation would cause the client's cost of execution to be increased. The executing broker dealer will be notified of the amount of each trade for each account. Alveo and/or its Associated Persons may participate in block trades with clients, and may also participate on a pro rata basis for partial fills, but only after the determination has been made that clients will receive fair and equitable treatment.

**Item 13 - Review of Accounts****Portfolio Management Account Reviews**

The Portfolio Manager named on the account is primarily responsible for the day to day management of the account.

Marian Stupka, CCO of Alveo, monitors client accounts on a continuous basis. Formal account reviews are conducted at least quarterly.

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 a client's request.

Account custodians generally provide account statements on a quarterly basis.

**Item 14 - Client Referrals and Other Compensation**

We do not receive any other bonuses from any outside parties in connection with our providing investment advice to you.

Non-employee (outside) consultants, individuals and/or entities, who are directly responsible for bringing a client to Alveo, may receive compensation from the firm. Such arrangements will comply with the requirements set forth in Rule 206(4)-3 of the Investment Advisers Act of 1940, including the requirement that the relationship between the solicitor and the investment adviser be disclosed to the Client at the time of the solicitation or referral. In addition, all applicable state laws will be observed. Under these arrangements, the client does not pay higher fees than Alveo's normal/typical advisory fees.

#### Item 15 - Custody

Alveo is deemed to have custody of client funds because of the fee deduction authority granted by the client in the Advisory Agreement. Clients will receive account statements at least quarterly from the broker-dealer or other qualified custodian. Clients are urged to review custodial account statements for accuracy.

#### Item 16 - Investment Discretion

Alveo offers Portfolio Management Services on a discretionary and non discretionary basis. Clients must grant discretionary authority in the client Advisory Agreement. Discretionary authority extends to the type and amount of securities to be bought and sold and do not require advance client approval. However, Alveo does not have the ability to withdraw funds or securities from the client's account.

When offering non-discretionary portfolio management services, Alveo will obtain client approval prior to executing any transactions in the client's account(s).

If you wish, you may limit our discretionary authority by, for example, setting a limit on the type of securities that can be purchased for your account. Simply provide us with your restrictions or guidelines in writing. Please refer to the "Advisory Business" section in this Brochure for more information on our discretionary management services.

#### Item 17 - Voting Client Securities

##### **Proxy Voting**

Alveo does not vote proxies or give any advice about how to vote proxies. It is the client's responsibility to vote proxies. Clients will receive proxy materials directly from the custodian.

#### Item 18 - Financial Information

We are required in this Item to provide you with certain financial information or disclosures about Alveo's financial condition. Alveo does not require the prepayment of over \$1,200, six or more months in advance. Additionally, Alveo 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 of State-Registered Advisers

**Our firm is SEC registered. As such, this section is intentionally left blank.**

#### Miscellaneous

##### **Class Action Lawsuits**

From time to time, securities held in the accounts of clients will be the subject of class action lawsuits. Alveo has no obligation to determine if securities held by the client are subject to a pending or resolved class action lawsuit. It also has no duty to evaluate a client's eligibility or to submit a claim to participate in the proceeds of a securities class action settlement or verdict. Furthermore, the firm has no obligation or responsibility to initiate litigation to recover damages on behalf of clients who may have been injured as a result of actions, misconduct, or negligence by corporate management of issuers whose securities are held by clients.

Where the firm receives written or electronic notice of a class action lawsuit, settlement, or verdict affecting securities owned by a client, it will forward all notices, proof of claim forms, and other materials, to the client. Electronic mail is acceptable where appropriate, and the client has authorized contact in this manner in the Investment Advisory Agreement.

##### **Confidentiality**

Alveo views protecting its customers' private information as a top priority and, pursuant to the requirements of the Gramm-Leach-Bliley Act, the firm has instituted policies and procedures to ensure that customer information is kept private and secure.

Alveo does not disclose any nonpublic personal information about its customers or former customers to any nonaffiliated third parties, except as permitted by law. In the course of servicing a client account, Alveo may share some information with its service providers, such as transfer agents, custodians, broker-dealers, accountants, and lawyers.

Alveo restricts internal access to nonpublic personal information about its clients to those employees who need to know that information in order to provide products or services to the client. Alveo

maintains physical and procedural safeguards that comply with state and federal standards to guard a client's nonpublic personal information and ensure its integrity and confidentiality. As emphasized above, it has always been and will always be the firm's policy never to sell information about current or former customers or their accounts to anyone. It is also the firm's policy not to share information unless required to process a transaction, at the request of the client, or as required by law.

A copy of the firm's privacy policy notice will be provided to each client prior to, or contemporaneously with, the execution of the Advisory Agreement. Thereafter, the firm will deliver a privacy policy notice whenever there is a change in the firm's privacy policies. If you have any questions on this policy, please contact Marian Stupka, the Chief Compliance Officer, at the telephone number listed on the cover page of this Brochure.

## **Marian Stupka**

Chief Compliance Officer/Investment Adviser Representative

## **Alveo Wealth Management, LLC**

1395 Brickell Ave.

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Miami, FL 33131

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Email: [mstupka@alveowm.com](mailto:mstupka@alveowm.com)

**March 12, 2018**

### **Form ADV Part 2B Brochure Supplement**

This Brochure Supplement provides information about Marian Stupka that supplements Alveo Wealth Management, LLC (hereinafter "Alveo") Brochure. You should have received a copy of that Brochure. Please contact us at (561) 371-0135 if you did not receive Alveo Wealth Management, LLC's Brochure or if you have any questions about the contents of this supplement.

Additional information about Marian Stupka is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Mr. Stupka's CRD number is 4446848.

### Educational Background and Business Experience - Item 2

**Marian Stupka**

Year of Birth: 1975

Formal Education After High School:

- Northwood University, B.A., Business Administration.

Business Background for the Previous Five Years:

- Alveo Wealth Management, LLC, Chief Compliance Officer/ Investment Adviser Representative, 07/2014 to Present
- Holdun Family Office, LLC, Chief Compliance Officer/ Investment Adviser Representative, 01/2013 to 04/2017.
- CGI Merchant Capital, LLC, Registered Representative, 06/2012 to 02/2018.
- CGI Capital Management, LLC, Chief Compliance Officer/ Investment Adviser Representative, 07/2013 to 12/2015.
- Oakrun Capital, Chief Operating Officer, 07/2008 to 12/2012.
- Citigroup Global Markets, inc., Investment Adviser Representative, 12/2002 to 06/2008.

### 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. Stupka and Alveo. Mr. Stupka has not been the subject of any criminal actions; he has not been the subject of any administrative proceedings before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority; he has not been the subject of any proceedings before any self-regulatory organization; and Mr. Stupka has not been the subject of any proceedings in which his professional attainment, designation, or license was revoked or suspended.

### Other Business Activities - Item 4

Mr. Stupka is not engaged in any reportable outside business activities.

### Additional Compensation – Item 5

Mr. Stupka does not receive additional compensation or economic benefits from third party sources in connection to his advisory activities.

### Supervision - Item 6

Mr. Stupka is an investment adviser representative of Alveo. In this role, Mr. Stupka is responsible for the monitoring of client portfolios for investment objectives and other supervisory reviews. Mr. Stupka is also the Chief Compliance Officer of Alveo. In this capacity, Mr. Stupka is responsible for the implementation of the firm's compliance program.

Alveo has implemented a Code of Ethics and an internal compliance program that guides each Associated Person in meeting their fiduciary obligations to clients. Mr. Stupka adheres himself to Alveo's Code of Ethics and compliance manual as mandated. Clients may contact Mr. Stupka at the phone number listed on the cover of this Brochure Supplement, to obtain a copy of Alveo's Code of Ethics.

Additionally, Alveo is subject to regulatory oversight by various agencies. These agencies require registration by Alveo and its employees. As a registered entity, Alveo is subject to examinations by regulators, which may be announced or unannounced. Alveo 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

**Our firm is SEC registered. As such, this section is intentionally left blank.**



**Arturo A. Barragan**  
Investment Adviser Representative

**Alveo Wealth Management, LLC**

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Miami, FL 33131

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**October 17, 2016**

**Form ADV Part 2B Brochure Supplement**

This Brochure Supplement provides information about Arturo A. Barragan that supplements Alveo Wealth Management, LLC (hereinafter “Alveo”) Brochure. You should have received a copy of that Brochure. Please contact us at (561) 371-0135 if you did not receive Alveo Wealth Management, LLC's Brochure or if you have any questions about the contents of this supplement.

Additional information about Arturo A. Barragan is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Educational Background and Business Experience - Item 2**

**Arturo A. Barragan**

Year of Birth: 1976

Formal Education After High School:

Bachelor degree in Business Administration from the Instituto Tecnologico Autonomo de Mexico (ITAM), 1999

Business Background for the Previous Five Years:

- Alveo Wealth Management, LLC, Investment Adviser Representative, 07/2014 to Present
- Global Investor Services, Registered Representative, 12/2012 to 06/2014
- Tradewire Securities, LLC, Private Banker, 05/2009 to 12/2012

**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. Barragan and Alveo. Mr. Barragan has not been the subject of any criminal actions; he has not been the subject of any administrative proceedings before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority; he has not been the subject of any proceedings before any self-regulatory organization; and Mr. Barragan has not been the subject of any proceedings in which his professional attainment, designation, or license was revoked or suspended.

**Other Business Activities - Item 4**

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

**Additional Compensation – Item 5**

Apart from the receipt of compensation for the activities disclosed under Item 4 above (if any), Mr. Barragan does not receive additional compensation or economic benefits from third party sources in connection to his advisory activities.

#### Supervision - Item 6

Ms. Barragan is an investment adviser representative of Alveo. In this role, Mr. Barragan is responsible for the monitoring of client portfolios for investment objectives and other supervisory reviews. Mr. Barragan is supervised by Marian Stupka, the Chief Compliance Officer of Alveo.

Alveo has implemented a Code of Ethics and an internal compliance program that guides each Associated Person in meeting their fiduciary obligations to clients. Mr. Barragan adheres himself to Alveo's Code of Ethics and compliance manual as mandated. Clients may contact Marian Stupka at the phone number listed on the cover of this Brochure Supplement, to obtain a copy of Alveo's Code of Ethics.

Additionally, Alveo is subject to regulatory oversight by various agencies. These agencies require registration by Alveo and its employees. As a registered entity, Alveo is subject to examinations by regulators, which may be announced or unannounced. Alveo 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 section is not applicable because our firm is SEC registered.**

**Eduardo Giralt**  
Investment Adviser Representative

**Alveo Wealth Management, LLC**

1395 Brickell Ave.  
Suite 800  
Miami, FL 33131

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**July 20, 2017**

**Form ADV Part 2B Brochure Supplement**

This Brochure Supplement provides information about Eduardo Giralt that supplements Alveo Wealth Management, LLC (hereinafter “Alveo”) Brochure. You should have received a copy of that Brochure. Please contact us at (561) 371-0135 if you did not receive Alveo Wealth Management, LLC's Brochure or if you have any questions about the contents of this supplement.

Additional information about Eduardo Giralt is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Mr. Giralt's CRD number is 3250935.

#### **Educational Background and Business Experience - Item 2**

**Eduardo Giralt Dominguez**

Year of Birth: 1972

Formal Education After High School:

- Business Administration degree from the Universidad Iberoamericana in Mexico in 1999

Business Background for the Previous Five Years:

- Alveo Wealth Management, LLC, Investment Adviser Representative, 03/2016 to Present
- Direwolf Wealth Management, LLC, Investment Adviser Representative, 06/2015 to Present
- GWM Group, Inc., Registered Representative, 08/2015 to 7/2017
- TCT Securities & Derivatives, LLC, Registered Representative, 06/2014 to 08/2015
- Global Investor Services, L.C., Registered Representative, 01/2013 to 06/2014
- Tradewire Securities, LLC, Registered Representative, 11/2009 to 12/2012

#### **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. Giralt and Alveo. Mr. Giralt has not been the subject of any criminal actions; he has not been the subject of any administrative proceedings before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority; he has not been the subject of any proceedings before any self-regulatory organization; and Mr. Giralt has not been the subject of any proceedings in which his professional attainment, designation, or license was revoked or suspended.

#### **Other Business Activities - Item 4**

Mr. Giralt is also an investment adviser representative of Direwolf Wealth Management, LLC, a registered investment adviser with the Florida Office of Financial Regulation. Mr. Giralt is compensated for his various capacities at Direwolf Wealth Management, LLC. This revenue is separate and in addition to revenue received from Alveo.

Mr. Giralt currently devotes approximately 30% of his time to his other business activities.

#### **Additional Compensation – Item 5**

Apart from the receipt of compensation for the activities disclosed under Item 4 above, Mr. Giralt does not receive additional compensation or economic benefits from third party sources in connection to his advisory activities.

**Supervision - Item 6**

Mr. Giralt is an investment adviser representative of Alveo. In this role, Mr. Giralt is responsible for the monitoring of client portfolios for investment objectives and other supervisory reviews. Mr. Giralt is supervised by Marian Stupka, the Chief Compliance Officer of Alveo.

Alveo has implemented a Code of Ethics and an internal compliance program that guides each Associated Person in meeting their fiduciary obligations to clients. Mr. Giralt adheres himself to Alveo's Code of Ethics and compliance manual as mandated. Clients may contact Mr. Giralt at the phone number listed on the cover of this Brochure Supplement, to obtain a copy of Alveo's Code of Ethics.

Additionally, Alveo is subject to regulatory oversight by various agencies. These agencies require registration by Alveo and its employees. As a registered entity, Alveo is subject to examinations by regulators, which may be announced or unannounced. Alveo 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 section is not applicable because our firm is SEC registered**

**Araceli Fernandez**  
Investment Adviser Representative

**Alveo Wealth Management, LLC**

1395 Brickell Ave.  
Suite 800  
Miami, FL 33131

Tel: (561) 371-0135  
Email: [afernandez@alveowm.com](mailto:afernandez@alveowm.com)

**October 17, 2016**

**Form ADV Part 2B Brochure Supplement**

This Brochure Supplement provides information about Araceli Fernandez Rodriguez that supplements Alveo Wealth Management, LLC (hereinafter “Alveo”) Brochure. You should have received a copy of that Brochure. Please contact us at (561) 371-0135 if you did not receive Alveo Wealth Management, LLC's Brochure or if you have any questions about the contents of this supplement.

Additional information about Araceli Fernandez Rodriguez is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Educational Background and Business Experience - Item 2**

**Araceli Fernandez Rodriguez**

Year of Birth: 1980

Formal Education After High School:

- ITAM, Mexico, Business Administration, 2005

Business Background for the Previous Five Years:

- Alveo Wealth Management, LLC, Investment Adviser Representative, 10/2016 to Present
- BBVA Bank Mexico, Derivatives Sales Associate and Trader, 2005-2010

**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 Ms. Fernandez and Alveo. Ms. Fernandez has not been the subject of any criminal actions; she has not been the subject of any administrative proceedings before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority; she has not been the subject of any proceedings before any self-regulatory organization; and Ms. Fernandez has not been the subject of any proceedings in which her professional attainment, designation, or license was revoked or suspended.

**Other Business Activities - Item 4**

Ms. Fernandez is not involved in any other financial industry activities and does not have any financial industry affiliations.

**Additional Compensation – Item 5**

Apart from the receipt of compensation for the activities disclosed under Item 4 above (if any), Ms. Fernandez does not receive additional compensation or economic benefits from third party sources in connection to her advisory activities.

**Supervision - Item 6**

Ms. Fernandez is an investment adviser representative of Alveo. In this role, Ms. Fernandez is responsible for the monitoring of client portfolios for investment objectives and other supervisory reviews. Ms. Fernandez is supervised by Marian Stupka, the Chief Compliance Officer of Alveo.

Alveo has implemented a Code of Ethics and an internal compliance program that guides each Associated Person in meeting their fiduciary obligations to clients. Ms. Fernandez adheres herself to Alveo's Code of Ethics and compliance manual as mandated. Clients may contact Marian Stupka at the phone number listed on the cover of



this Brochure Supplement, to obtain a copy of Alveo's Code of Ethics.

Additionally, Alveo is subject to regulatory oversight by various agencies. These agencies require registration by Alveo and its employees. As a registered entity, Alveo is subject to examinations by regulators, which may be announced or unannounced. Alveo 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 section is not applicable because our firm is SEC registered.**