

Alpha Vee Advisors LLC

Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of Alpha Vee Advisors LLC. If you have any questions about the contents of this brochure, please contact us at (617) 212-8691 or by email at: leigh@alphaveeadvisors.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 Alpha Vee Advisors LLC is also available on the SEC's website at www.adviserinfo.sec.gov. Alpha Vee Advisors LLC's CRD number is: 329205.

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Registration as an investment adviser does not imply a certain level of skill or training.

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Item 2: Material Changes

Alpha Vee Advisors LLC has the following material changes to report. Material changes relate to Alpha Vee Advisors LLC's policies, practices or conflicts of interests.

- Alpha Vee Advisors has updated its firm to an Internet adviser. (Item 4)

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Item 4: Advisory Business

A. Description of the Advisory Firm

Alpha Vee Advisors LLC (hereinafter “AVA”) is a Limited Liability Company organized in the State of Nevada. The firm was formed in May 2023, and the principal owner is Leigh Eichel.

B. Types of Advisory Services

Sub-Advisory/Model Provider Services

AVA offers its advisory services to Advisors. AVA acts as model provider to Turney Asset Management Programs or sub-advisor to Advisors (“Organizations”). In this capacity, AVA generally acts as a sub-advisor or model provider to an Organization and offers its model portfolios indirectly to the Organizations’ clients. In addition, AVA provides back-office administration services to the Organizations, which include research and other analytics. In addition, AVA also assists with guidance, technology implementation, model assignments, and the availability of research reports for its clients. AVA will only engage with financial professionals and never retail clients.

AVA will work with various TAMP’s such as, but not limited to; SmartX, Smartleaf, Amplify, Fusion CM, Advyzon, Virtue Capital and others.

AVA acts as a Model Provider to other investment advisors unaffiliated with AVA. AVA provides models to the third-party advisors for their portfolio management services. These relationships are memorialized in each contract between AVA and the third-party advisors.

AVA is not responsible for analysis of the Organization’s clients’ financial situation, suitability requirements, asset allocations, or restrictions. Moreover, if an Organization’s clients decide to retain AVA as a sub-advisor in partnership with the Organization, the Organization will be responsible for providing AVA’s Part 2A to the Organization’s end-user clients.

Services Limited to Specific Types of Investments

AVA generally limits its investment models and/ or strategies to fixed income securities, equities, options, ETFs, treasury inflation protected/inflation linked bonds and non-U.S. securities. AVA may use other securities as well to help diversify a portfolio when applicable.

C. Client Tailored Services and Client Imposed Restrictions

AVA provides their sub-advisory outsourcing services to Organizations acting on behalf of their clients, and indirectly services the clients of the Organizations based on the objectives and instructions provided by the Organization to AVA.

D. Wrap Fee Programs

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees and transaction costs. AVA does not participate in wrap fee programs.

E. Assets Under Management

AVA has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$0	\$0	January 2024

Item 5: Fees and Compensation

Sub-Advisory/Model Provider Fees

AVA provides investment advisory services, as sub-adviser, to unaffiliated investment advisers that seek specific securities-related advice and recommendations. The advice and recommendations are provided through the development of model portfolios. When acting as a sub-advisor or model provider to other Organizations, AVA charges portfolio management fees as a percentage of total assets under management in its models, payable monthly in arrears, by the Organizations' clients' accounts.

AVA receives an annual management fee up to .68% for these model portfolios. When AVA is engaged by an Advisor, the Advisor, pursuant to client authorization, may instruct the account's TAMP provider to pay AVA's fee directly to AVA directly from the TAMP. AVA has no authority to deduct fees from the account – this authority rests solely with the Organizations. If AVA's client is an advisor, the Advisor will pay AVA directly. Advisor or TAMP are responsible for ensuring clients will receive, at least quarterly, statements from the custodian which will reflect all the activity in the account, including the deduction of the Advisor's fee. Fees for accounts initiated during a fee period may or may not be prorated as determined by the Advisor's agreement with the client.

The Organizations' clients are responsible for the payment of all third-party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). if the client is not in a wrap fee program with that organization. Those fees are separate and distinct from the fees and expenses charged by AVA. Please see Item 12 of this brochure regarding broker-dealer/custodian.

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

AVA does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

Item 7: Types of Clients

AVA's clients are other industry professionals, such as TAMPS, Registered Investment Advisers, and Asset Managers.

Item 8: Methods of Analysis, Investment Strategies, & Risk of Loss

A. Methods of Analysis and Investment Strategies

Methods of Analysis

AVA's methods of analysis include Charting Analysis, Cyclical Analysis, Fundamental Analysis, Modern Portfolio Theory, Quantitative Analysis and Technical Analysis.

Charting Analysis involves the use of patterns in performance charts. AVA uses this technique to search for patterns used to help predict favorable conditions for buying and/or selling a security.

Cyclical Analysis involves the analysis of business cycles to find 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.

Modern Portfolio Theory is a theory of investment that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, each by carefully choosing the proportions of various asset.

Quantitative Analysis deals with measurable factors as distinguished from qualitative considerations such as the character of management or the state of employee morale, such as the value of assets, the cost of capital, historical projections of sales, and so on.

Technical Analysis involves the analysis of past market data; primarily price and volume.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

B. Material Risks Involved

Methods of Analysis

Charting Analysis strategy involves using and comparing various charts to predict long and short-term performance or market trends. The risk involved in using this method is that only past performance data is considered without using other methods to crosscheck data. Using charting analysis without other methods of analysis would be making the assumption that past performance will be indicative of future performance. This may not be the case.

Cyclical Analysis assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are two-fold: 1) the markets do not always repeat cyclical patterns; and 2) if too many investors begin to implement this strategy, then it changes the very cycles these investors are trying to exploit.

Fundamental Analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Modern Portfolio Theory assumes that investors are risk averse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio exists with a more favorable risk-expected return profile – i.e., if for that level of risk an alternative portfolio exists which has better expected returns.

Quantitative Analysis Investment strategies using quantitative models may perform differently than expected as a result of, among other things, the factors used in the models, the weight placed on each factor, changes from the factors' historical trends, and technical issues in the construction and implementation of the models.

Technical Analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not take into account new patterns that emerge over time.

Investment Strategies

Long-term trading is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

Short term trading risks include liquidity, economic stability, and inflation, in addition to the long-term trading risks listed above. Frequent trading can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

Robo-advisory services use algorithms as the basis of the management process. Risks of this approach include, but are not limited to, that the algorithm might rebalance allocations provided in model portfolio.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

C. Risks of Specific Securities Utilized

AVA's use of margin transactions and options trading generally holds greater risk of capital loss. Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below (leaving aside Treasury Inflation Protected/Inflation Linked Bonds) are not guaranteed or insured by the FDIC or any other government agency.

Mutual Funds: Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond "fixed income" nature (lower risk) or stock "equity" nature.

Equity investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

Fixed income investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

Exchange Traded Funds (ETFs): An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Risks in investing in ETFs include trading risks, liquidity and shutdown risks, risks associated with a change in authorized participants and non-participation of authorized participants, risks that trading price differs from indicative net asset value (iNAV), or price fluctuation and disassociation from the index being tracked. With regard to trading risks, regular trading adds cost to your portfolio thus counteracting the low fees that one of the typical benefits of ETFs. Additionally, regular trading to beneficially “time the market” is difficult to achieve. Even paid fund managers struggle to do this every year, with the majority failing to beat the relevant indexes. With regard to liquidity and shutdown risks, not all ETFs have the same level of liquidity. Since ETFs are at least as liquid as their underlying assets, trading conditions are more accurately reflected in implied liquidity rather than the average daily volume of the ETF itself. Implied liquidity is a measure of what can potentially be traded in ETFs based on its underlying assets. ETFs are subject to market volatility and the risks of their underlying securities, which may include the risks associated with investing in smaller companies, foreign securities, commodities, and fixed income investments (as applicable). Foreign securities in particular are subject to interest rate, currency exchange rate, economic, and political risks, all of which are magnified in emerging markets. ETFs that target a small universe of securities, such as a specific region or market sector, are generally subject to greater market volatility, as well as to the specific risks associated with that sector, region, or other focus. ETFs that use derivatives, leverage, or complex investment strategies are subject to additional risks. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed “electronic shares” not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors. The return of an index ETF is usually different from that of the index it tracks because of fees, expenses, and tracking error. An ETF may trade at a premium or discount

to its net asset value (NAV) (or indicative value in the case of exchange-traded notes). The degree of liquidity can vary significantly from one ETF to another and losses may be magnified if no liquid market exists for the ETF's shares when attempting to sell them. Each ETF has a unique risk profile, detailed in its prospectus, offering circular, or similar material, which should be considered carefully when making investment decisions.

Options are contracts to purchase a security at a given price, risking that an option may expire out of the money resulting in minimal or no value. An uncovered option is a type of options contract that is not backed by an offsetting position that would help mitigate risk. The risk for a "naked" or uncovered put is not unlimited, whereas the potential loss for an uncovered call option is limitless. Spread option positions entail buying and selling multiple options on the same underlying security, but with different strike prices or expiration dates, which helps limit the risk of other option trading strategies. Option transactions also involve risks including but not limited to economic risk, market risk, sector risk, idiosyncratic risk, political/regulatory risk, inflation (purchasing power) risk and interest rate risk.

Non-U.S. securities present certain risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available.

Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Item 9: Disciplinary Information

A. Criminal or Civil Actions

There are no criminal or civil actions to report.

B. Administrative Proceedings

There are no administrative proceedings to report.

C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

A. Registration as a Broker/Dealer or Broker/Dealer Representative

Neither AVA nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither AVA nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

Neither AVA nor its representatives have any material relationships to this advisory business that would present a possible conflict of interest.

D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections

AVA does not utilize nor select third-party investment advisers.

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

A. Code of Ethics

AVA has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. AVA's Code of Ethics is available free upon request to any client or prospective client.

B. Recommendations Involving Material Financial Interests

AVA does not recommend that clients buy or sell any security in which a related person to AVA or AVA has a material financial interest.

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of AVA may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of AVA to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. AVA will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

D. Trading Securities At/Around the Same Time as Clients' Securities

From time to time, representatives of AVA may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of AVA to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest; however, AVA will never engage in trading that operates to the client's disadvantage if representatives of AVA buy or sell securities at or around the same time as clients.

Item 12: Brokerage Practices

A. Factors Used to Select Custodians and/or Broker/Dealers

Custodians/broker-dealers already procured by Organizations employing sub-advisory services by AVA are obliged to their own duties to their clients to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. AVA may ~~also~~ consider the market expertise and research access provided by the broker-dealer/custodian, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers that may aid in AVA's research efforts. AVA will never charge a premium or commission on transactions. Any charges applied to Organizations' clients would come from their relationship to their own custodial agreements, not by AVA hands.

AVA will establish agreements with third-party TAMPs capable of delivering on models using their technology platform integrations to multiple custodian/broker-dealers

1. Research and Other Soft-Dollar Benefits

AVA has access to research, products, or other services from its custodians and other broker/dealer in connection with client securities transactions ("soft dollar benefits") consistent with (and not outside of) the safe harbor contained in Section 28(c) of the Securities Exchange Act of 1934, as amended, and may consider these benefits in recommending brokers. There can be no assurance that any particular client will benefit from any particular soft dollar research or other benefits. AVA benefits by not having to produce or pay for the research, products or services.

2. Brokerage for Client Referrals

AVA receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

3. Clients Directing Which Broker/Dealer/Custodian to Use

AVA may permit Organizations to direct it to execute transactions through a specified broker-dealer. Organizations must refer to their advisory agreements for a complete understanding of how they may be permitted to direct brokerage.

B. Aggregating (Block) Trading for Multiple Client Accounts

AVA does not buy or sell securities, therefore, does not participate in Block Trading.

Item 13: Review of Accounts

AVA does not manage individual client accounts. Organizations are responsible for the review of sub-advised client accounts.

Reporting will be as directed by the services provided by their Organizations' policies. This written report will come from their Organization of the Organization's custodian or broker/dealer.

Item 14: Client Referrals and Other Compensation

A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

AVA does not receive any economic benefit, directly or indirectly from any third party for advice rendered to AVA's Organizations or their clients.

B. Compensation to Non - Advisory Personnel for Client Referrals

AVA does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

Item 15: Custody

AVA does not have custody or limited custody. Fees are paid to AVA by its clients not deducted from custodial accounts.

Item 16: Investment Discretion

AVA does not provide discretionary investment advisory services to clients. The Investment Advisory Contract established with each client indicates that AVA is a model provider on their platform or available to their firm.

Item 17: Voting Client Securities (Proxy Voting)

AVA will not ask for, nor accept voting authority for client securities. Clients may or may not receive proxies directly from the issuer of the security or the custodian dependent on the contract they hold with their clients.

Item 18: Financial Information

A. Balance Sheet

AVA neither requires nor solicits prepayment of more than \$500 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither AVA nor its management has any financial condition that is likely to reasonably impair AVA's ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years

AVA has not been the subject of a bankruptcy petition in the last ten years.