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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.

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 March 29, 2024, we submitted our annual updating amendment for fiscal year 2023 and amended Item 4 of our Form ADV Part 2A Brochure to reflect discretionary assets under management of \$5,531,161, and non-discretionary assets under management of \$1,361,577.

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

Item 3 - Table of Contents

Contents

Item 2 - Material Changes.....	2
Item 3 - Table of Contents	3
Item 4 - Advisory Business	4
Item 5 - Fees and Compensation	5
Item 6 - Performance-Based Fees and Side-By-Side Management	7
Item 7 - Types of Clients.....	8
Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss	8
Item 9 - Disciplinary Information	16
Item 10 - Other Financial Industry Activities or Affiliations	16
Item 11 - Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	17
Item 12 - Brokerage Practices	17
Item 13 - Review of Accounts	18
Item 14 - Client Referrals and Other Compensation.....	18
Item 15 - Custody.....	19
Item 16 - Investment Discretion	19
Item 17 - Voting Client Securities.....	19
Item 18 - Financial Information	19
Item 19 - Requirements of State-Registered Advisers.....	20
Miscellaneous	20
Form ADV Part 2B Brochure Supplement - Marian Stupka.....	21
Form ADV Part 2B Brochure Supplement - Arturo A. Barragan.....	24
Form ADV Part 2B Brochure Supplement - Araceli Fernandez	27
Form ADV Part 2B Brochure Supplement - Joaquin Garibay Lopez-Negrete.....	30

Item 4 - Advisory Business

Alveo Wealth Management, LLC (hereinafter “Alveo” or the “firm”) is a registered investment adviser based in Mexico City, Mexico. 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.

Recommendation of Third-party advisers

We recommend other third-party advisers or programs to manage all or a portion of our clients’ accounts. All third-party advisers recommended by our firm must either be registered as investment advisers or exempt from registration requirements. Factors that we take into consideration when making our recommendations include, but are not limited to, the following: the third-party adviser’s performance, methods of analysis, fees, your financial needs, investment goals, risk tolerance, and investment objectives. We will periodically monitor the third-party adviser’s performance to ensure its management and investment style remains aligned with your investment goals and objectives.

The third-party adviser may offer wrapped or non-wrapped pricing options. Wrap pricing structures allow the Client to pay an all-inclusive fee for management, brokerage, clearance, custody, and administrative services. In a non-wrap pricing structure, the third-party adviser’s fee may be separate from the advisory fee charged by Alveo. Transaction costs may also be charged for the execution and clearance of advisory transactions directed by such third-party investment advisory services. A complete description of the programs and services provided, the amount of total fees, the payment structure, termination provisions and other aspects of each program are detailed and disclosed in: i) the third party adviser’s Form ADV Part 2A; ii) the program wrap

brochure (if applicable) or other applicable disclosure documents; iii) the disclosure documents of the portfolio manager(s) selected; or, iv) the third party adviser's account opening documents. A copy of all relevant disclosure documents of the third-party adviser and of the individual portfolio manager(s) will be provided to anyone interested in these programs/managers.

Assets Under Management

As of December 31, 2023, we have discretionary assets under management of \$5,531,161, and non-discretionary assets under management of \$1,361,577.

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 and/or a performance-based fee. Our asset-based fees range from 0.10% 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.

Performance-Based Management Fees

Clients who have agreed to pay us a performance-based fees will receive a detailed description of the performance fee calculation method in a prospectus or a similar disclosure document. Clients are advised that performance-based fees involve a sharing of any portfolio gains between the client and the firm. Such performance-based fees create conflicts of interest which are described in greater detail below in Item 6.

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. 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.

The client is encouraged to review all account statements for accuracy. In addition, we urge clients to review the qualified custodian's fee calculation methods because such methods may differ from one custodian to another. For example, some custodians may base their fee on the amount of assets in the account on the last day of the month, some custodians may use a daily average value for the number of days in a quarter, others may use the daily average value of the number of trading days in the month, etc.

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.

Third Party Adviser Fees

Our firm and/or our Associated Persons will receive a portion of the fee you pay to the third-party adviser. Advisory fees that you pay to third party advisers are established and payable in accordance with the Form ADV

Brochure provided by each third-party adviser to whom you are referred. These fees may or may not be negotiable. You should review the recommended third-party adviser's brochure and take into consideration their fees along with our fees to determine the total amount of fees charged to your account.

You will be required to sign an agreement directly with the third-party adviser(s). You may terminate your advisory relationship with the third-party adviser(s) according to the terms of your agreement with the third-party adviser(s). You should review each adviser's brochure for specific information on how you may terminate your advisory relationship with the adviser and how you may receive a refund, if applicable. You should contact the third-party adviser directly for questions regarding your advisory agreement with the third-party adviser.

Since our compensation may differ depending upon our individual agreement with each third-party adviser, we have an incentive to recommend one third party adviser over another third party adviser with whom we have less favorable compensation arrangements or other advisory programs offered by third party advisers with which we have no compensation arrangements. At all times Alveo and its Associated Persons uphold their fiduciary duty of fair dealing with Clients.

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

Negotiability of Fees: We allow Associated Persons servicing the account to negotiate the exact investment management fees within the range disclosed in our Form ADV Part 2A Brochure. As a result, the Associated Person servicing your account may charge more or less for the same service than another Associated Person of our firm. Further, our annual investment management fee may be higher than that charged by other investment advisors offering similar services/programs.

Billing on Cash Positions: The firm treats cash and cash equivalents as an asset class. Accordingly, unless otherwise agreed in writing, all cash and cash equivalent positions (e.g., money market funds, etc.) are included as part of assets under management for purposes of calculating the firm's advisory fee. At any specific point in time, depending upon perceived or anticipated market conditions/events (there being no guarantee that such anticipated market conditions/events will occur), the firm may maintain cash and/or cash equivalent positions for defensive, liquidity, or other purposes. While assets are maintained in cash or cash equivalents, such amounts could miss market advances and, depending upon current yields, at any point in time, the firm's advisory fee could exceed the interest paid by the client's cash or cash equivalent positions.

Billing on Margin: Unless otherwise agreed in writing, the gross amount of assets in the client's account, including margin balances, are included as part of assets under management for purposes of calculating the firm's advisory fee. Clients should note that this practice will increase total assets under management used to calculate advisory fees which will in turn increase the amount of fees collected by our firm. This practice creates a conflict of interest in that our firm has an incentive to use margin in order to increase the amount of billable assets. At all times, the firm and its Associated Persons strive to uphold their fiduciary duty of fair dealing with clients. Clients are free to restrict the use of margin by our firm. However, clients should note that any restriction on the use of margin may negatively impact an account's performance in a rising market.

Periods of Portfolio Inactivity: The firm has a fiduciary duty to provide services consistent with the client's best interest. As part of its investment advisory services, the firm will review client portfolios on an ongoing basis to determine if any changes are necessary based upon various factors, including but not limited to investment performance, fund manager tenure, style drift, account additions or withdrawals, the client's financial circumstances, and changes in the client's investment objectives. Based upon these and other factors, there may be extended periods of time when the firm determines that changes to a client's portfolio are neither necessary nor prudent. Notwithstanding, unless otherwise agreed in writing, the firm's annual investment advisory fee will continue to apply during these periods, and there can be no assurance that investment decisions made by the firm will be profitable or equal any specific performance level(s).

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

As noted in Item 5 above, Alveo charges certain clients a performance-based fee (i.e., a fee based on the increase in the value of an account). We charge performance-based fees only to Non-US Clients or US Qualified Clients who have a net worth (excluding primary residence) greater than \$2,200,000, or those for whom we manage a minimum of \$1,100,000, from the beginning of our agreement for services.

Performance-based compensation may be larger or smaller than otherwise would be the case if the fee was calculated as a percentage of assets under management because the amount of the fee will be based on actual account performance. We stand to receive compensation with regard to unrealized (not sold) appreciation as well as realized (sold) gains in performance-based management fee client accounts. The fees charged by us in performance-based management fee arrangements may be higher or lower than fees charged by other advisers for comparable services.

Performance-based fee arrangements create a conflict of interest as they create an incentive for the adviser to recommend investments that carry a higher degree of risk to the client. Alveo mitigates this conflict by selecting investments that we believe to be appropriate for clients.

Such fee arrangements could also create an incentive for the adviser to favor higher fee-paying accounts over other accounts in the allocation of investment opportunities. However, Alveo addresses this conflict by seeking to invest client accounts fairly and equally.

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 \$1,000,000 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:

- Fundamental analysis is a method of evaluating a company or security by attempting to measure its intrinsic value. In other words, trying to determine a company's or a security's true value by looking at all aspects of the business, including both tangible factors (e.g., machinery buildings, land, etc.) and intangible factors (e.g., patents, trademarks, "brand" names, etc.). Fundamental analysis also involves examining related economic factors (e.g., overall economy and industry conditions, etc.), financial factors (e.g., company debt, interest rates, management salaries and bonuses, etc.), qualitative factors (e.g., management expertise, industry cycles, labor relations, etc.), and quantitative factors (e.g., debt-to-equity and price-to-equity ratios). The end goal of performing fundamental analysis is to produce a value that an investor can compare with the security's current price in hopes of determining what sort of position to take with that security (underpriced = buy, overpriced = sell or short). This method of security analysis is considered the opposite of technical analysis. Fundamental analysis is about using real data to evaluate a security's value. Although most analysts use fundamental analysis to value stocks, this method of valuation can be used for just about any type of security.
- 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. Technical trading models are mathematically driven based upon historical data and trends of domestic and foreign market trading activity, including various industry and sector trading statistics within such markets. Technical trading models, through mathematical algorithms, attempt to identify when markets are likely to increase or decrease and identify appropriate entry and exit points. The primary risk of technical trading models is that historical trends and past performance cannot predict future trends, and there is no assurance that the mathematical algorithms employed are designed properly, updated with new data, and can accurately predict future market, industry, and sector performance.
- Charting analysis involves the gathering and processing of price and volume pattern information for a particular security, sector, broad index, or commodity. This price and volume pattern information is analyzed. The resulting pattern and correlation data is used to detect departures from expected

performance and diversification and predict future price movements and trends. The primary risk of charting analysis is that it may not accurately detect anomalies or predict future price movements. Current prices of securities may reflect all information known about the security and day-to-day changes in market prices of securities may follow random patterns and may not be predictable with any reliable degree of accuracy.

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

- *Long Term Purchases* – securities purchased with the expectation that the value of those securities will grow over a relatively long period, generally greater than one year. Using a long-term purchase strategy generally assumes the financial markets will go up in the long-term which may not be the case. There is also the risk that the segment of the market that you are invested in or perhaps just your particular investment will go down over time even if the overall financial markets advance. Purchasing investments long-term may create an opportunity cost - "locking-up" assets that may be better utilized in the short-term in other investments.
- *Short Term Purchases* – securities purchased with the expectation that they will be sold within a relatively short period of time, generally less than one year, to take advantage of the securities' short-term price fluctuations. Using a short-term purchase strategy generally assumes that we can predict how financial markets will perform in the short-term which may be very difficult and will incur a disproportionately higher amount of transaction costs compared to long-term trading. There are many factors that can affect financial market performance in the short-term (such as short-term interest rate changes, cyclical earnings announcements, etc.), but they may have a smaller impact over longer periods.
- *Trading* – securities are sold within 30 days. The principal type of risk associated with trading is market risk. 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. Other factors, such as changes in exchange control regulation, tax laws, withholding taxes, international, political and economic developments, and government, economic or monetary policies, may affect investments as well. Additionally, trading is speculative. Market movements are difficult to predict and are influenced by, among other things, government trade, fiscal, monetary and exchange control programs and policies; changing supply and demand relationships; national and international political and economic events; changes in interest rates; and the inherent volatility of the marketplace. In addition, governments from time to time intervene, directly and by regulation, in certain markets, often with the intent to influence prices directly. The effects of governmental intervention may be particularly significant at certain times in the financial instrument markets and such intervention (as well as other factors) may cause these markets to move rapidly.
- *Margin Transactions* – margin strategies allow an investor to purchase securities on credit and to borrow on securities already in their custodial account. Interest is charged on any borrowed funds for the period that the loan is outstanding. When you purchase securities, you may pay for the securities in full or you may borrow part of the purchase price from your broker-dealer. If you intend to borrow funds in connection with your account, you will be required to open a margin account, which will be carried by the broker-dealer of your account. The securities purchased in such an account are the broker-dealer's collateral for its loan to you. If the securities in a margin account decline in value, the value of the collateral supporting this loan also declines, and, as a result, a brokerage firm is required to take action, such as issue a margin call and/or sell securities or other assets in your accounts, in order to maintain necessary level of equity in the account. It is important that you fully understand the risks involved in trading securities on margin, which are applicable to any margin account that you may maintain,

including any margin Account that may be established as a part of our advisory services and held by your broker-dealer. These risks include the following:

1. You can lose more funds than you deposit in your margin account.
 2. The broker-dealer can force the sale of securities or other assets in your account.
 3. The broker-dealer can sell your securities or other assets without contacting you.
 4. You may not be able to choose which securities or other assets in your margin account are liquidated or sold to meet a margin call.
 5. The broker-dealer may move securities held in your cash account to your margin account and pledge the transferred securities.
 6. You may not be entitled to an extension of time on a margin call.
- *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 generally use covered options. Covered options involve options trading when you own the underlying instrument on which the option is based. Investments in options contracts have the risk of losing value in a relatively short period. Option contracts are leveraged instruments that allow the holder of a single contract to control many shares of an underlying stock. This leverage can compound gains or losses.

Risk of Loss

Clients should be aware that investing in securities involves a risk of loss that they should be prepared to bear.

Past performance is not indicative of future results. Therefore, you should never assume that future performance of any specific investment or investment strategy would be profitable. Investing in securities (including stocks, mutual funds, and bonds, etc.) involves risk of loss. Further, depending on the different types of investments there may be varying degrees of risk. You should be prepared to bear investment loss including loss of original principal. Because of the inherent risk of loss associated with investing, our firm is unable to represent, guarantee, or even imply that our services and methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to market corrections or declines.

There are certain additional risks associated with investing in securities, as described below:

Recommendation of Particular Types of Securities

As disclosed under the “Advisory Business” section in this Brochure, we provide advice on various types of securities and we do not necessarily recommend one particular type of security over another since each Client has different needs and different tolerance for risk. Each type of security has its own unique set of risks associated with it and it would not be possible to list here all of the specific risks of every type of investment. Even within the same type of investment, risks can vary widely. However, in very general terms, the higher the anticipated return of an investment, the higher the risk of loss associated with it.

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 in which you intend to invest.

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 governmental 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.

Equity (stock) Market Risk: Common stocks are susceptible to general stock market fluctuations and to volatile increases and decreases in value as market confidence in and perceptions of their issuers change. If you held common stock, or common stock equivalents, of any given issuer, you would generally be exposed to greater risk than if you held preferred stocks and debt obligations of the issuer.

Company Risk: When investing in stock positions, there is always a certain level of company or industry specific risk that is inherent in each investment. This is also referred to as unsystematic risk and can be reduced through appropriate diversification. There is the risk that the company will perform poorly or have its value reduced based on factors specific to the company or its industry. For example, if a company's employees go on strike or the company receives unfavorable media attention for its actions, the value of the company may be reduced.

Fixed Income Risk: When investing in bonds, there is the risk that the issuer will default on the bond and be unable to make payments. Further, individuals who depend on set amounts of periodically paid income face the risk that inflation will erode their spending power. Fixed-income investors receive set, regular payments that face the same inflation risk.

Preferred Securities Risk: Preferred Securities have similar characteristics to bonds in that preferred securities are designed to make fixed payments based on a percentage of their par value and are senior to common stock. Like bonds, the market value of preferred securities is sensitive to changes in interest rates as well as changes in issuer credit quality. Preferred securities, however, are junior to bonds with regard to the distribution of corporate earnings and liquidation in the event of bankruptcy. Preferred securities that are in the form of preferred stock also differ from bonds in that dividends on preferred stock must be declared by the issuer's board of directors, whereas interest payments on bonds generally do not require action by the issuer's board of directors, and bondholders generally have protections that preferred stockholders do not have, such as indentures that are designed to guarantee payments – subject to the credit quality of the issuer – with terms and conditions for the benefit of bondholders. In contrast preferred stocks generally pay dividends, not interest payments, which can be deferred or stopped in the event of credit stress without triggering bankruptcy or default. Another difference is that preferred dividends are paid from the issue's after-tax profits, while bond interest is paid before taxes.

Risks Associated with Investing in Mutual Funds: Mutual funds are professionally managed collective investment systems that pool money from many investors and invest in stocks, bonds, short-term money market instruments, other mutual funds, other securities, or any combination thereof. The fund will have a manager that trades the fund's investments in accordance with the fund's investment objective. While mutual funds generally provide diversification, risks can be significantly increased if the fund is concentrated in a particular sector of the market, primarily invests in small cap or speculative companies, uses leverage (i.e., borrows money) to a significant degree, or concentrates in a particular type of security (i.e., equities) rather than balancing the fund with different types of securities. The returns on mutual funds can be reduced by the costs to manage the funds. In addition, while some mutual funds are "no load" and charge no fee to buy into, or sell out of, other types of mutual funds do charge such fees which can also reduce returns.

Risks Associated with Investing in Exchange Traded Funds (ETF): Investing in stocks & ETF's carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Investments in these securities are not guaranteed or insured by the FDIC or any other government agency.

Management Risk: Your investment with our firm varies with the success and failure of our investment strategies, research, analysis and determination of portfolio securities. If our investment strategies do not produce the expected returns, the value of the investment will decrease.

Municipal Securities Risk: The value of municipal obligations can fluctuate over time. Value may be affected by adverse political, legislative and tax changes. Financial developments affecting the municipal issuers affect the value as well. Because many municipal obligations are issued to finance similar projects by municipalities (e.g., housing, healthcare, water and sewer projects, etc.), conditions in the sector related to the project can affect the overall municipal market. Payment of municipal obligations may depend on an issuer's general unrestricted revenues; revenue generated by a specific project, the operator of the project, or government appropriation or aid. There is a greater risk if investors can look only to the revenue generated by the project. In addition, municipal bonds generally are traded in the "over-the-counter" market among dealers and other large institutional investors. From time to time, liquidity in the municipal bond market (the ability to buy and sell bonds readily) may be reduced in response to overall economic conditions and credit tightening.

Alternatives Risk: Non-traded REITs, business development companies, limited partnerships, and direct alternatives are subject to various risks such as liquidity and property devaluation based on adverse economic and real estate market conditions and may not be suitable for all investors. A prospectus that discloses all risks, fees, and expenses may be obtained from your investment adviser representative. Read the prospectus carefully before investing. This is not a solicitation or offering which can only be made in conjunction with a copy of the prospectus. Investors considering an investment strategy utilizing alternative investments should understand that alternative investments are generally considered speculative in nature; and, such investments involve a high degree of risk, particularly if concentrating investments in one or few alternatives investments.

Foreign Securities Risk: Foreign securities are subject to additional risks not typically associated with investments in domestic securities. These risks may include, among others, currency risk, country risks (political, diplomatic, regional conflicts, terrorism, war, social and economic instability, currency devaluations and policies that have the effect of limiting or restricting foreign investment or the movement of assets), different trading practices, less government supervision, less publicly available information, limited trading markets and greater volatility. To the extent that underlying funds invest in issuers located in emerging markets, the risk may be heightened by political changes, changes in taxation, or currency controls that could adversely affect the values of these investments. Emerging markets have been more volatile than the markets of developed countries with more mature economies.

Risks Associated with Investing in Private Funds: Private investment funds are not registered with the Securities and Exchange Commission and may not be registered with any other regulatory authority. Accordingly, they are

not subject to certain regulatory restrictions and oversight to which other issuers are subject. There may be little public information available about their investments and performance. Moreover, as sales of shares of private investment companies are generally restricted to certain qualified purchasers, it could be difficult for a Client to sell its shares of a private investment company at an advantageous price and time. Since shares of private investment companies are not publicly traded, from time to time it may be difficult to establish a fair value for the Client's investment in these companies.

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.

Environmental, Social, and Governance Investment Criteria Risk: If a portfolio is subject to certain environmental, social and governance (ESG) investment criteria it may avoid purchasing certain securities for ESG reasons when it is otherwise economically advantageous to purchase those securities, or may sell certain securities for ESG reasons when it is otherwise economically advantageous to hold those securities. In general, the application of the portfolio's ESG investment criteria may affect the portfolio's exposure to certain issuers, industries, sectors and geographic areas, which may affect the financial performance of the portfolio, positively or negatively, depending on whether these issuers, industries, sectors or geographic areas are in or out of favor. An adviser can vary materially from other advisers with respect to its methodology for constructing ESG portfolios or screens, including with respect to the factors and data that it collects and evaluates as part of its process. As a result, an adviser's ESG portfolio or screen may materially differ from or contradict the conclusions reached by other ESG advisers concerning the same issuers. Further, ESG criteria are dependent on data and are subject to the risk that such data reported by issuers or received from third-party sources may be subjective, or it may be objective in principle but not verified or reliable.

Risks Associated with Investing in Inverse and Leveraged Funds: Leveraged mutual funds and ETFs generally seek to deliver multiples of the daily performance of the index or benchmark that they track. Inverse mutual funds and ETFs generally seek to deliver the opposite of the daily performance of the index or benchmark that they track. Inverse funds often are marketed as a way for investors to profit from, or at least hedge their exposure to, downward-moving markets. Some Inverse funds are both inverse and leveraged, meaning that they seek a return that is a multiple of the inverse performance of the underlying index. To accomplish their objectives, leveraged and inverse funds use a range of investment strategies, including swaps, futures contracts, and other derivative instruments. Leveraged, inverse, and leveraged inverse funds are more volatile and riskier than traditional funds due to their exposure to leverage and derivatives, particularly total return swaps and futures. At times, we will recommend leveraged and/or inversed funds, which may amplify gains and losses.

Most leveraged funds are typically designed to achieve their desired exposure on a daily (in a few cases, monthly) basis, and reset their leverage daily. A "single day" is measured from the time the leveraged fund calculates its net asset value ("NAV") to the time of the leveraged fund's next NAV calculation. The return of the leveraged fund for periods longer than a single day will be the result of each day's returns compounded over the period. Due to the effect of this mathematical compounding, their performance over longer periods of time can differ significantly from the performance (or inverse performance) of their underlying index or benchmark during the same period of time. For periods longer than a single day, the leveraged fund will lose money when the level of the Index is flat, and the leveraged fund may lose money even if the level of the Index rises. Longer holding periods, higher index volatility, and greater leverage all exacerbate the impact of compounding on an investor's

returns. During periods of higher Index volatility, the volatility of the Index may affect the leveraged fund's return as much as or more than the return of the Index itself. Therefore, holding leveraged, inverse, and leveraged inverse funds for longer periods of time increases their risk due to the effects of compounding and the inherent difficulty in market timing. Leveraged funds are riskier than similarly benchmarked funds that do not use leverage. Non-traditional funds are highly volatile and not suitable for all investors. They provide the potential for significant losses.

Risks Associated with Investing in Buffer ETFs: Buffer ETFs are also known as defined-outcome ETFs since the ETF is designed to offer downside protection for a specified period of time. These ETFs are modeled after options-based structured notes, but are generally cheaper, and offer more liquidity. Buffer ETFs are designed to safeguard against market downturns by employing complex options strategies. Buffer ETFs typically charge higher management fees that are considerably more than the index funds whose performance they attempt to track. Additionally, because buffer funds own options, they do not receive dividends from their equity holdings. Both factors result in the underperformance of the Buffer ETF compared to the index they attempt to track. Clients should carefully read the prospectus for a buffer ETF to fully understand the cost structures, risks, and features of these complex products.

Structured Notes: Below are some specific risks related to the structured notes recommended by our firm:

- *Complexity:* Structured notes are complex financial instruments. Clients should understand the reference asset(s) or index(es) and determine how the note's payoff structure incorporates such reference asset(s) or index(es) in calculating the note's performance. This payoff calculation may include leverage multiplied by the performance of the reference asset or index, protection from losses should the reference asset or index produce negative returns, and/or fees. Structured notes may have complicated payoff structures that can make it difficult for clients to accurately assess their value, risk and potential for growth through the term of the structured note. Determining the performance of each note can be complex and this calculation can vary significantly from note to note depending on the structure. Notes can be structured in a wide variety of ways. Payoff structures can be leveraged, inverse, or inverse-leveraged, which may result in larger returns or losses. Clients should carefully read the prospectus for a structured note to fully understand how the payoff on a note will be calculated and discuss these issues with our firm.
- *Market risk.* Some structured notes provide for the repayment of principal at maturity, which is often referred to as "principal protection." This principal protection is subject to the credit risk of the issuing financial institution. Many structured notes do not offer this feature. For structured notes that do not offer principal protection, the performance of the linked asset or index may cause clients to lose some, or all, of their principal. Depending on the nature of the linked asset or index, the market risk of the structured note may include changes in equity or commodity prices, changes in interest rates or foreign exchange rates, and/or market volatility.
- *Issuance price and note value:* The price of a structured note at issuance will likely be higher than the fair value of the structured note on the date of issuance. Issuers now generally disclose an estimated value of the structured note on the cover page of the offering prospectus, allowing investors to gauge the difference between the issuer's estimated value of the note and the issuance price. The estimated value of the notes is likely lower than the issuance price of the note to investors because issuers include the costs for selling, structuring, and/or hedging the exposure on the note in the initial price of their notes. After issuance, structured notes may not be re-sold on a daily basis and thus may be difficult to value given their complexity.
- *Liquidity:* The ability to trade or sell structured notes in a secondary market is often very limited, as structured notes (other than exchange-traded notes known as ETNs) are not listed for trading on securities exchanges. As a result, the only potential buyer for a structured note may be the issuing financial institution's broker-dealer affiliate or the broker-dealer distributor of the structured note. In addition, issuers often specifically disclaim their intention to repurchase or make markets in the notes

they issue. Clients should, therefore, be prepared to hold a structured note to its maturity date or risk selling the note at a discount to its value at the time of sale.

- **Credit risk:** Structured notes are unsecured debt obligations of the issuer, meaning that the issuer is obligated to make payments on the notes as promised. These promises, including any principal protection, are only as good as the financial health of the structured note issuer. If the structured note issuer defaults on these obligations, investors may lose some, or all, of the principal amount they invested in the structured notes as well as any other payments that may be due on the structured notes.

Illiquid securities: Illiquid securities involve the risk that investments may not be readily sold at the desired time or price. Securities that are illiquid, that are not publicly traded, and/or for which no market is currently available may be difficult to purchase or sell, which may impact the price or timing of a transaction. An inability to sell securities can adversely affect an account's value or prevent an account from taking advantage of other investment opportunities. Lack of liquidity may cause the value of investments to decline and illiquid investments may also be difficult to value. A Client may not be able to liquidate investment in the event of an emergency or any other reason.

Certain investment strategies used by our firm may invest in illiquid asset vehicles, such as private equity and real estate. Investment in an illiquid asset vehicle poses similar risks as direct investments in illiquid securities. In addition, investment in an illiquid asset vehicle will be subject to the terms and conditions of the illiquid asset vehicle's investment policy and governing documents that often include provisions that may involve investor lock-in periods, mandatory capital calls, redemption restrictions, infrequent valuation of assets, etc. In addition, investments in illiquid securities or vehicle may normally involve investment in non-marketable securities where there is limited transparency. If obligated to sell an illiquid security prior to an expected maturity date, particularly with an infrastructure investment, they may not be able to realize fair value. Investments in illiquid securities or vehicles may include restrictions on withdrawal rights and shares may not be freely transferable.

Cybersecurity Risks – Wealthtech Partners and its service providers are subject to risks associated with a breach in cybersecurity. Cybersecurity is a generic term used to describe the technology, processes and practices designed to protect networks, systems, computers, programs and data from cyber-attacks and hacking by other computer users, and to avoid the resulting damage and disruption of hardware and software systems, loss or corruption of data, and/or misappropriation of confidential information. In general, cyber-attacks are deliberate, however, unintentional events may have similar effects. Cyber-attacks may cause losses to Clients by interfering with the processing of transactions, affecting the ability to calculate net asset value or impeding or sabotaging trading. Clients may also incur substantial costs as the result of a cybersecurity breach, including those associated with forensic analysis of the origin and scope of the breach, increased and upgraded cybersecurity, identity theft, unauthorized use of proprietary information, litigation, and the dissemination of confidential and proprietary information. Any such breach could expose our firm to civil liability as well as regulatory inquiry and/or action. In addition, Clients could be exposed to additional losses as a result of unauthorized use of their personal information. While our firm has established business continuity plans, incident response plans and systems designed to prevent cyber-attacks, there are inherent limitations in such plans and systems, including the possibility that certain risks have not been identified. Similar types of cyber security risks also are present for issuers of securities in which we invest, which could result in material adverse consequences for such issuers and may cause a client's investment in such securities to lose value.

Pandemic Risk: Large-scale outbreaks of infectious disease can greatly increase morbidity and mortality over a wide geographic area, crossing international boundaries, and causing significant economic, social, and political disruption. It is difficult to predict the long-term impact of such events because they are dependent on a variety of factors including the global response of regulators and governments to address and mitigate the worldwide effects of such events. Workforce reductions, travel restrictions, governmental responses and policies and macroeconomic factors will negatively impact investment returns.

Cryptocurrency Risk: Cryptocurrency (e.g., bitcoin and ether), often referred to as “virtual currency”, “digital currency,” or “digital assets,” is designed to act as a medium of exchange. Cryptocurrency is an emerging asset class. There are thousands of cryptocurrencies, the most well-known of which is bitcoin. Certain of the firm’s clients may have exposure to bitcoin or another cryptocurrency, directly or indirectly through an investment such as an ETF or other investment vehicles. Cryptocurrency operates without central authority or banks and is not backed by any government. Cryptocurrencies may experience very high volatility and related investment vehicles may be affected by such volatility. As a result of holding cryptocurrency, certain of the firm’s clients may also trade at a significant premium or discount to NAV. Cryptocurrency is also not legal tender. Federal, state or foreign governments may restrict the use and exchange of cryptocurrency, and regulation in the U.S. is still developing. The market price of many cryptocurrencies, including bitcoin, has been subject to extreme fluctuations. If cryptocurrency markets continue to be subject to sharp fluctuations, investors may experience losses if the value of the client’s investments decline. Similar to fiat currencies (i.e., a currency that is backed by a central bank or a national, supra-national or quasi-national organization), cryptocurrencies are susceptible to theft, loss and destruction. Cryptocurrency exchanges and other trading venues on which cryptocurrencies trade are relatively new and, in most cases, largely unregulated and may therefore be more exposed to fraud and failure than established, regulated exchanges for securities, derivatives and other currencies. The SEC has issued a public report stating U.S. federal securities laws require treating some digital assets as securities.

Cryptocurrency exchanges may stop operating or permanently shut down due to fraud, technical glitches, hackers or malware. Due to relatively recent launches, most cryptocurrencies have a limited trading history, making it difficult for investors to evaluate investments. Generally, cryptocurrency transactions are irreversible such that an improper transfer can only be undone by the receiver of the cryptocurrency agreeing to return the cryptocurrency to the original sender. Digital assets are highly dependent on their developers and there is no guarantee that development will continue or that developers will not abandon a project with little or no notice. Third parties may assert intellectual property claims relating to the holding and transfer of digital assets, including cryptocurrencies, and their source code. Any threatened action that reduces confidence in a network’s long-term ability to hold and transfer cryptocurrency may affect investments in cryptocurrencies.

Many significant aspects of the U.S. federal income tax treatment of investments in cryptocurrency are uncertain and an investment in cryptocurrency may produce income that is not treated as qualifying income for purposes of the income test applicable to regulated investment companies. Certain cryptocurrency investments may be treated as a grantor trust for U.S. federal income tax purposes, and an investment by the firm’s clients in such a vehicle will generally be treated as a direct investment in cryptocurrency for tax purposes and “flow-through” to the underlying investors.

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 are not engaged in other financial industry activities or affiliations.

Recommendation of Other Advisors

We recommend third party advisers to clients and we share in the compensation received by the third-party adviser. The compensation arrangement presents a conflict of interest due to a financial incentive to recommend the services of a third-party adviser that pays us a higher referral fee. You are not required to use the services of recommended third party advisers.

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 recommend the services of a third-party adviser. Alveo will share in the compensation received by the third-party adviser. The compensation arrangement presents a conflict of interest due to a financial incentive

to recommend the services of a third-party adviser. You are not required to use the services of any recommended third-party adviser.

Alveo does not currently have any compensation agreements with outside parties for Client referrals.

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

Av de las Palmas 731 int 601
Colonia lomas de Chapultepec
Mexico City, Mexico 11000

Tel: (561) 371-0135

Email: mstupka@alveowm.com

March 29, 2024

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. 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

Marian Stupka, the Chief Compliance Officer of Alveo, is also the Chief Compliance Officer of Holdun Family Office, LLC, a SEC registered investment adviser based in Florida. Mr. Stupka is compensated for his various capacities at Holdun Family Office, LLC. This revenue is separate and in addition to revenue received from Alveo. Mr. Stupka currently devotes approximately 50% of his time to his other business activities. Alveo does not expect this arrangement to create a conflict of interest because the firm and Holdun Family Office, LLC do not have joint client relationship and do not refer clients to one another.

Additional Compensation – Item 5

Apart from the receipt of compensation for the activities disclosed under Item 4 above, 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

Managing Member/Portfolio Manager

Alveo Wealth Management, LLC

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Colonia lomas de Chapultepec
Mexico City, Mexico 11000

Tel: (561) 371-0135

Email: abarragan@alveowm.com

March 29, 2024

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.

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, Managing Member/Portfolio Manager, 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 a Portfolio Manager 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.

Araceli Fernandez

Portfolio Manager

Alveo Wealth Management, LLC

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March 29, 2024

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.

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, Portfolio Manager, 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 a Portfolio Manager 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.

Joaquin Garibay Lopez-Negrete

Portfolio Manager

Alveo Wealth Management, LLC

Av de las Palmas 731 int 601
Colonia lomas de Chapultepec
Mexico City, Mexico 11000

Tel: (561) 371-0135
Email: JGaribay@alveowm.com

March 29, 2024

Form ADV Part 2B Brochure Supplement

This Brochure Supplement provides information about Joaquin Garibay Lopez-Negrete 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 Joaquin Garibay Lopez-Negrete is available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience - Item 2

Joaquin Garibay Lopez-Negrete

Year of Birth: 1970

Formal Education After High School:

- Universidad de las Americas Mexico City, Bachelor of Arts in Business Administration, 1996

Business Background for the Previous Five Years:

- Alveo Wealth Management, LLC, Portfolio Manager, 01/2022 to Present
- Credit Suisse - Mexico City, Director of Discretionary Mandates, 05/2016 to 02/2020

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. Lopez-Negrete and Alveo. Mr. Lopez-Negrete 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. Lopez-Negrete 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. Lopez-Negrete is not involved in any other reportable financial industry activities and does not have any reportable financial industry affiliations.

Additional Compensation – Item 5

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

Supervision - Item 6

Mr. Lopez-Negrete is an Portfolio Manager of Alveo. In this role, Mr. Lopez-Negrete is responsible for the monitoring of client portfolios for investment objectives and other supervisory reviews. Mr. Lopez-Negrete 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. Lopez-Negrete 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.