

Investment Advisor Brochure



Name of Registered Investment Advisor:	Ally Business & Wealth
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Email Address:	Kevin.Ally@Outlook.com
Date of Brochure as Last Revised:	08/14/2020, Issue 0

This brochure provides information about the qualifications and business practices of Ally Business & Wealth. If you have any questions about the contents of this brochure, please contact us at using one of the methods listed above. 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. Registration is mandatory for all persons meeting the definition of investment advisor and does not imply a certain level of skill or training.

Additional information about our firm is available on the SEC's website at: www.adviserinfo.sec.gov.

Material Changes (08/14/2020, Issue 0)

The purpose of this section is to discuss only material changes since the last annual update of Ally Business & Wealth Investment Advisor Brochure. Brochures are released once a year unless any significant material changes are made. In the event of a material change, a new brochure will be released and delivered to clients within 120 days of our fiscal end.

Summary of Material Changes

There have been no material changes made to our Brochure. The latest brochure is dated **08/14/2020, Issue 0**.

Advisory Business



Ally Business & Wealth provides business development and investment advisory services to small businesses and individuals. Kervin (Kevin) Ally is the founder and sole owner.

Ally Business & Wealth provides services to individuals, executives, professionals, entrepreneurs, retirees, and small business owners from all industries. We work with clients based in the U.S., but who also may have family, assets, or business interests in another country.

Ally Business & Wealth provides Business Development and Investment Management services. Most services are ongoing in nature and are priced relative to a client's total available investable assets. We may, however, undertake more limited engagements under certain circumstances, particularly if a client would like to explore a longer-term engagement.

Ally Business & Wealth constructs client portfolios based on the individual needs and circumstances of each client, paying particular attention to a client's financial goals, their emotional tolerance for risk, and the client's financial ability to deal with investment risk. Clients fill out a risk assessment questionnaire, but the Investment Advisor is free to add observations and judgment in determining a client's risk profile. Before a portfolio is implemented, the client-advisor team agrees on an Investment Policy, which describes the goals of the proposed portfolio, the likely investment risk

associated with the general type of a portfolio that is being considered for a client, and any other relevant needs or restrictions that the client wishes to place on the operation of the portfolio.

Fees and Compensation



Ally Business & Wealth charges a flat fee of 2.00% applied to investment assets of under management.

For example, a portfolio of \$10,000 rises to \$11,000 in one year. This represents a holding period return of 10% [(\$11,000-\$10,000)/\$10,000]. A non-accredited investor's fee for the year is \$220 [2% * \$11,000].

Investment Management fees are computed as a percentage of assets under management (AUM), defined as the average daily balance of all covered account(s) over the quarterly billing period most recently ended. Fees are based on an annual cycle but are calculated and assessed quarterly, in arrears, and deducted from client's assets. A client's billing cycle begins on the first day of the month that is closest to their contract signing date, which may or may not coincide with a calendar quarter. Through investment management services, the client may be subject to other fees and expenses associated with investing such as custodian fees, mutual fund expenses, brokerage and other transactions costs which can be found in the Brokerage section of this brochure.

In unusual and exceptional circumstances, special fee arrangements may be individually negotiated. As a result of these factors, similar situated clients could pay different fees, the services to be provided Ally Business & Wealth to any particular client could be available from other advisers at lower fees, and certain clients may have fees different than those specifically set forth above.

Fees are not collected for services to be performed more than six months in advance.

Performance Based Fees and Side-By-Side Management

For accredited investors only, an additional performance fee of 20% is applied to profits who surpass a 6% threshold level.

Using our previous example above, an accredited investor's fee for the year is \$228 [(2% * \$11,000) + 20% * (10%-6%) * \$1,000].



Types of Clients and Account Minimums

Ally Business & Wealth provides advisory services to individuals, trusts, estates, business entities, pension and profit-sharing plans, and other ERISA accounts.

The minimum portfolio size for standalone Investment Management services is generally \$200. Portfolios may be comprised of several individual accounts of smaller sizes. Our firm may, however, in its sole discretion, charge a lesser investment management fee and/or waive or reduce its minimum asset requirement based upon certain criteria, i.e., anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, negotiations with client, etc.



Methods of Analysis, Investment Strategies, and Risk of Loss

Ally Business & Wealth employs asset class analysis and various asset allocation strategies for investment management. We analyze the likely volatility of the portfolio allocation and review macroeconomic scenarios. We generally select fund managers to implement security selection within an asset class but may provide advice on individual securities based either on our own proprietary research or research from trusted third parties. Portfolios are adjusted based on client needs. Portfolios are rebalanced when actual asset class allocations differ too much from their targets or when client and/or economic circumstances warrant. While there is risk in all investments, the kind of risks differs, and some types of investments carry a greater degree of risk and/or higher costs. There is no guarantee that the investment strategy selected for the client will result in the client's goals being met, nor is there any guarantee of profit or protection from loss. For those investments sold by prospectus, clients should read the prospectus in full.

Ally Business and Wealth is disclosing risks and opportunities for our investment strategy and for particular types of securities used.

- Stock represents ownership in a company. If the company prospers and grows, the value of the stock should increase. Even if a company is profitable, the stock prices are subject to "market risk" which is attributable to investor attitudes. Stock ownership in more established companies is more conservative, while younger companies provide the most risk and reward opportunities.
- American Depositary Receipt ("ADR") represents an interest in the shares of a non-U.S. company that have been deposited with a U.S. bank. ADRs trade in U.S. dollars and clear through U.S. settlement systems, allowing ADR holders to avoid having to transact in a foreign currency. An ADR may represent the underlying shares on a one-for-one basis or may represent a fraction of a share or multiple shares. The use of a ratio allows ADRs to be priced at an amount more typical of U.S. market share prices. ADRs may be "sponsored" or "unsponsored." Sponsored ADRs are those in which the non-U.S. company enters into an agreement directly with the U.S. depository bank to arrange for recordkeeping, forwarding of shareholder communications, payment of dividends, and other services. An unsponsored ADR is set up without the cooperation of the non-U.S. company and may be initiated by a broker-dealer wishing to establish a U.S. trading market. An ADR, however, may not be established unless the non-U.S. company is either subject to the reporting requirements under the Securities Exchange Act of 1934 or is exempt under the Act.
- Debt Securities (corporate or municipal bonds) are promissory notes that pay interest and the return of principal at the end of a specified term. Credit risk is the chance the issuer will fail to pay the interest payments on the security or to pay the principal at maturity. Interest rate risk is that the market value of the bonds will go down when interest rates go up. Prepayment risk is the chance that a bond will be paid off early. For example, if interest rates fall, a bond issuer may decide to pay off its debt. When this happens, the investor may not be able to reinvest the proceeds in an investment with as high a return or yield.
- High Yield Bonds have a lower credit rating than investment-grade bonds. Because of the higher risk of default, these bonds pay a higher yield than investment grade bonds.
- Mutual Fund is an investment pool, which may include money market instruments, stocks, bonds, or other investment vehicles. Professional money managers research, select, and monitor the performance of the securities the fund purchases. It is easier to achieve diversification through ownership of mutual funds rather than through ownership of individual stocks or bonds. Even with no-load or load-waived funds, there are mutual fund expenses paid to the fund company. Investors may have to pay taxes on capital gains distribution received by the fund, but not distributed to the investor. Mutual funds redeem shares at net asset value ("NAV") at the end of the trading day.
- Unit Investment Trust ("UIT") is similar to a mutual fund, but once the UIT selects the securities it will hold them. The portfolio is not actively managed and does not sell securities in response to ordinary market fluctuations. There may be special risks if a portfolio is concentrated within a specific sector of the market.
- Index Fund is an investment pool (e.g., mutual fund or ETF invested in stocks, bonds, or other investment vehicles) that aims to replicate the movements of an index of a specific financial market. The lack of active management generally gives the advantage of lower fees and lower taxes in taxable accounts. There are fees, which reduce the return to the investor relative to the index. It is usually impossible to precisely mirror the index, as the models for sampling and mirroring, by their nature, cannot be 100% accurate. The difference between the index performance and the fund performance is known as the "tracking error." By design, an index fund seeks to match rather than outperform the target index. Therefore, a good index fund with low tracking error will not generally outperform the index, but rather produces a rate of return similar to the index minus fund costs. An index fund does not have to follow a well-known index. There are thousands of index funds, leaving advisors to determine which fund best matches the client's risk capacity and other investment objectives.
- Exchange Traded Fund ("ETF") holds securities to match the price performance of a certain market index or commodity price. ETFs can track stock indexes and sectors, bonds and precious metals. ETFs are subject to the same market risks as the index or sector they are designed to track. ETFs can be bought and sold throughout the day like stocks. ETFs may be an index fund or a fully transparent actively managed fund. Certain ETFs are relatively easy to understand, while others may have unusual or complex strategies. For example, "leveraged ETFs" seek to achieve performance equal to a multiple of an index after fees and expenses. These ETFs seek to achieve their investment objective on a daily basis only, potentially making them unsuitable for long-term investors. "Inverse ETFs" use various derivatives to prove from the decline in value of an underlying index or basket of assets.
- Exchange Traded Notes ("ETN") are senior, unsecured debt security issued by a bank, unlike an ETF which holds assets such as stocks, commodities, or currencies which are the basis of the price of the ETF. The return of an ETN is linked to a market index or other benchmark. An ETN promises to pay at maturity, the full value of the index, minus the management fee. Like any other debt security, the investor is subject to the credit risk of the bank issuer.

Disciplinary Information

An investment advisor must disclose material facts about any legal or disciplinary event that is material to a client's evaluation of the advisory business or of the integrity of its management personnel.

Ally Business & Wealth does not have any disclosure items.

Other Financial Industry Activities and Affiliations

Ally Business & Wealth does not have any financial industry activities or affiliations material to the advisory business or to clients.

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



Ally Business & Wealth maintains a Code of Ethics. The Code of Ethics sets forth standards of conduct expected of advisory personnel, requires compliance with federal securities laws, and addresses conflicts that arise from personal trading by advisory personnel. Clients may request a copy of the Code of Ethics.

Ally Business & Wealth also maintains and enforces written policies reasonably designed to prevent the misuse of material non-public information by Ally Business & Wealth or any person associated with Ally Business & Wealth.

Neither Ally Business & Wealth nor any related person of Ally Business & Wealth recommends, buys, or sells for client accounts securities in which Ally Business & Wealth or any related person of Ally Business & Wealth has a material financial interest.

Ally Business & Wealth and/or Financial Advisors of Ally Business & Wealth may buy or sell securities that are also recommended to clients. This practice may create a situation where Ally Business & Wealth and/or its Financial Advisors are in a position to materially benefit from the sale or purchase of those securities. In such circumstances we will try to avoid conflicts with clients and will not violate the Advisor's fiduciary responsibilities to clients.



Brokerage Practices

Ally Business & Wealth recommends, and clients may choose to implement trades and maintain custody of assets through TD Ameritrade, Inc.. Clients may pay transaction fees to TD Ameritrade, Inc., for the purchase of "no-load" funds as well as commissions for transactions effected on individual equity, ETF/ETN, and fixed income securities. TD Ameritrade, Inc., provides clients with consolidated statements.

Ally Business & Wealth considers several factors in recommending TD Ameritrade, Inc. (or any other broker-dealer/custodian to clients), including historical relationship with TD Ameritrade, Inc., financial strength, reputation, execution capabilities, pricing, research, and service. Although the commissions and/or transaction fees paid by Ally Business & Wealth's clients shall comply with Ally Business & Wealth's duty to obtain best execution, a client may pay a commission that is higher than another qualified broker-dealer might charge to effect the same transaction. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including the value of research provided, execution capability, commission rates, and responsiveness. Accordingly, although Ally Business & Wealth will seek competitive rates, it may not necessarily obtain the lowest possible commission rates for client account transactions. The brokerage commissions or transaction fees charged by the designated broker-dealer/custodian are exclusive of, and in addition to, Ally Business & Wealth's investment management fee.

Review of Accounts and Reports on Accounts

Ally Business & Wealth performs periodic reviews of each client's investment accounts. Account reviews are handled in a "rolling" fashion rather than on a fixed schedule. Our firm may also conduct account reviews on an other-than-periodic basis if there is a triggering event, such as a change in client investment objectives and/or financial situation, market corrections, or a client request.

Clients are reminded that it is their responsibility to notify the advisor any time there are changes in the client's financial situation or investment objectives, or if the client wants to impose or modify account restrictions.

Clients receive transaction confirmation notices and regular summary account statements directly from the broker-dealer/custodian and/or program sponsor for their various accounts. In addition, Ally Business & Wealth makes an online Investment Portal available to its Investment Management clients. The Investment Portal provides instant access to historical investment reporting information for all managed accounts, broken down by portfolio as well as by individual account. This information is updated on a daily basis. Clients can request additional investment reports if they wish.

Client Referrals & Other Compensation

Ally Business & Wealth does not enter into solicitation agreements and thus does not compensate for client referrals.

Ally Business & Wealth does not enter into solicitation agreements and thus does not receive compensation for client referrals.

Custody



Although client assets are held at a third-party independent custodian, Ally Business & Wealth is deemed to have custody of client funds solely because of the fee deduction authority granted by the client in the advisory agreement. Except for this fee deduction, we do not have authority to withdraw funds out of client accounts.

Clients will receive account statements at least quarterly from the broker-dealer or other qualified custodian. Clients are encouraged to compare custodial account statements against statements prepared by Ally Business & Wealth for accuracy. Minor variations may occur because of reporting dates, accrual methods of interest and dividends, and other factors. The custodial statement is the official record of your account for tax purposes.

The client retains full ownership rights to all securities and funds in any accounts that are managed by Ally Business & Wealth.

Investment Discretion

Ally Business & Wealth maintains full discretion under a limited power of attorney as to the securities and amount of securities in client accounts.

Ally Business & Wealth will not have authority to withdraw funds or to take custody of client funds or securities, other than under the terms of the Fee Payment Authorization clause in the Agreement with the client.

The client will designate the broker/dealer to be used for trading and custodial services. Ally Business & Wealth may "trade away" for bond transactions in order to seek best execution. The bonds will be custodied at the broker/dealer designated by the client under a prime brokerage arrangement.

Voting Client Securities

Ally Business & Wealth does not vote proxies. It is the client's responsibility to vote proxies. Clients will receive proxy materials directly from the custodian. Questions about proxies may be made via the contact information on the cover page.

Financial Information

An investment advisor must provide financial information if a threshold of fee prepayments is met; there is a financial condition likely to impair the ability to meet contractual commitments; or, a bankruptcy within the past ten years.

Ally Business & Wealth does not have any disclosure items in this section.



Requirements for State Registered Advisors

Advisor:

Kervin (Kevin) Ally



Education Background:

Embry Riddle Aeronautical University, Daytona Beach, FL, Master of Business Administration with honors, 2017.

University of Florida, Gainesville, FL. Bachelor of Aerospace Engineering, 2014.

University of Florida, Gainesville, FL. Bachelor of Mechanical Engineering, 2014.

Business Background:

Ally Business & Wealth, Owner/Financial Advisor, Chief Compliance Officer, 2020

Eaton Aerospace Group, Product Sales Manager, 2014 – Present

Aristocracy, LLC., Owner, 2017 – Present

Disciplinary Information:

An investment advisor and its supervised persons (Investment Advisor Representatives) must disclose material facts about any legal or disciplinary event that is material to a client's evaluation of the advisory business or of the integrity of the Investment Advisor Representative.

Kervin (Kevin) Ally does not have any disclosure items.

Other Business Activities

Kervin (Kevin) Ally does conduct other business activities outside of providing investment advice such as business development services, and property management and financial lending through Aristocracy, LLC.

Additional Compensation

Kervin (Kevin) Ally does not receive any additional compensation outside of the fees described in the **Fees and Compensation and Performance Based Fees and Side-By-Side Management** sections above.

Supervision

Kervin (Kevin) Ally is the Owner and Chief Compliance Officer. As such, Kervin (Kevin) Ally is responsible for all advice provided to clients. She may be contacted at the phone number of the main office as shown on the cover page.

State Registered Advisors

Kervin (Kevin) Ally has no other disclosure events.