

Item 1: Cover Page



Alinea Invest, Inc.

New York City, NY 10033

www.alinea-invest.com

January 11, 2021

This brochure provides information about the qualifications and business practices of Alinea Invest, Inc. If you have any questions about the contents of this brochure, please contact us at lakhani.anam@alinea-invest.com or (516) 469-9482. 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.

Additional information about Alinea Invest, Inc is also available on the SEC's website at www.adviserinfo.sec.gov.

Alinea Invest, Inc.'s registration as an investment adviser does not imply a certain level of skill or training, but only indicates that Alinea Invest, Inc. has registered its business with federal regulatory authorities, including the SEC (CRD#: 311782).

Item 2: Material Changes

This brochure constitutes part of the initial filing with the SEC by Alinea Invest, Inc.

Item 3: Table of Contents

Table of Contents

Item 1: Cover Page	1
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	6
Item 7: Types of Clients	6
Item 8: Methods of Analysis, Investment Strategies and Risk of Loss	6
Item 9: Disciplinary Information	11
Item 10: Other Financial Industry Activities and Affiliations	11
Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	11
Item 12: Brokerage Practices	12
Item 13: Review of Accounts	13
Item 14: Client Referrals and Other Compensation	13
Item 15: Custody	13
Item 16: Investment Discretion	13
Item 17: Voting Client Securities	13
Item 18: Financial Information	14

Item 4: Advisory Business

Firm Description

Alinea Invest, Inc. (hereinafter referred to as “Alinea”, the “Firm”, “we”, “us”, “our”) is a Delaware corporation with its principal office located in New York City, NY and is registered with the Securities and Exchange Commission (the “SEC”) as an investment advisor. The Firm was formed in November 2020 and is owned by Anam Lakhani, Eve Halimi and Nikhil Agrawal. Each owns 30.37% of the company and are control persons.

Alinea provides investment advisory services to retail investors exclusively through an investment services technology platform offered only through a mobile application (the “App Platform”). Alinea is a technology company that owns and maintains the App Platform through which advisory clients receive investment recommendations to invest in individual U.S. stocks. At this time, we are only providing access to investments in 50 blue chip stocks. All investment activities and recommendations are provided directly by Alinea via the App Platform. Clients execute trades at their own will.

The Firm offers limited research on the issuer of the stock that is recommended to the client which can be seen via the App Platform with a subscription. The research data is provided by several different sources at this time such as Morningstar, CFRA, Trefis and MSCI. While the Firm provides recommendations with respect to stocks solely through the App Platform, the client makes the ultimate decision regarding the purchase or sale of such stock purchases.

Alinea offers non-discretionary investment recommendations and advisory services to individual investors. Alinea interacts with investment advisory clients, as well as prospective clients, solely through the App Platform. Alinea does not offer financial planning services, tax, accounting, or legal advice.

Alinea utilizes the App Platform to collect information with respect to each client and prospective clients and to deliver account notifications and content, and to provide Alinea’s investment recommendations.

Upon account opening (“Client Onboarding”), the client will be prompted to complete a series of questions that will be used, in combination with other available client information collected through the App Platform prior to and/or after account opening including banking information, to deliver a stock recommendation. These questions are important to the development of any investment recommendations.

Alinea’s algorithm suggests certain stock investments via the App Platform based on the interests the client selects on the initial questionnaire completed by the client during Client Onboarding. The stock suggestions will be delivered for viewing over the internet via the App Platform. The App Platform will show a risk rating, impact

score, price performance and financial data for each stock suggestion. Each client is responsible for ultimately deciding whether to accept and act upon the suggested stock recommendations. Clients also have the ability to search for stocks within the App Platform that have not been recommended and decide whether to purchase those stocks.

Client Onboarding is only complete once a client (i) has linked the client's bank account ("Funding Account") to the Firm's custodian via the App Platform. No staff at the Firm will have access to a client's bank account information nor will staff at the Firm have access to a client's login credentials; and (ii) has accepted and countersigned Alinea's investment advisory agreement electronically. Only when Client Onboarding is complete will a client have the availability to purchase stocks via the App Platform.

Clients should consider that Alinea primarily uses electronic (not telephonic) means to provide customer support. To receive customer support, clients may contact us using email or through the App Platform. Clients and prospective clients should be comfortable communicating through those channels. Further, clients should understand that clients will not interact directly with investment advisory personnel.

Alinea reserves the right to deny any prospective clients access to the Alinea App Platform and to terminate client accounts for reasons related, but not limited, to unsuitability and/or if clients fail to timely maintain financial and other information previously provided by the client on the App Platform or update this information on at least an annual basis.

A client's failure to timely update their information in the App Platform could materially impact the quality and applicability of Alinea's investment recommendations.

During the Client Onboarding process, the client will also be prompted to simultaneously open a brokerage account held by the designated custodian in order to execute any trades. The independent custodian will hold client funds and securities.

At any time, clients may terminate an account, or withdraw all or part of an account. See below (Fees and Compensation) for more information regarding fees, including withdrawal/administrative charges.

Item 5: Fees and Compensation

Currently, we do not charge fees for our investment advisory services which includes access to the App Platform. We expect to assess nominal subscription fees in the future and at such time will update this Brochure. At such time, we do not expect subscription fees to be negotiable.

Clients may be assessed fees by the custodian in conjunction with transactions,

account maintenance, etc. Such fees are separate from us, and we do not receive any portion of them.

Additional Client Fees

There are no sales loads, brokerage fees, mark-ups, mark-downs, spreads paid to market makers, or brokerage termination or account surrender fees associated with our program. A client may, however, incur certain separate charges imposed by the custodian such as: wire transfer and electronic fund fees, retirement account custodial or account termination fees, in addition to certain taxes on non-retirement brokerage accounts.

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

Alinea does not accept performance-based fees and does not engage in side-by-side management.

Item 7: Types of Clients

Alinea provides investment advice to individuals. There is no account size minimum.

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

Alinea uses a passive management style of investing to recommend equity securities. Alinea currently only offers for investment 50 blue chip stocks. Through the App Platform, Alinea provides its clients with brief snapshots of information such as financial data, profit and loss, and balance sheet for equity securities. Through the App Platform Alinea displays a rating for each equity security that is designed to measure a company's resilience to environmental, social and governance risk ("ESG Risk"). ESG Risk and opportunities vary by industry and company. The ESG ratings identify key issues that are material to that company's industry or sector.

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

INVESTMENT STRATEGIES

Alinea does not actively manage client accounts. Investors will only be provided with a recommendation that they either accept or reject. Clients can also choose to search for other companies within the App Platform to invest in. All client accounts are self-directed. Alinea's investment advisory services are only offered through electronic means, e.g., via the App Platform. Alinea does not interact with clients in person, over the phone, in live chat or in any other manner.

In order to meet its objective of providing clients a user-friendly access to investing,

Alinea's recommendations will be based on information collected by Alinea through the App Platform such as a client's answers to the Alinea personal financial summary questionnaire which is part of the sign-up process.

Clients are requested to provide information, which in combination with other available client information collected through the App Platform, guides Alinea in making a recommendation for that particular investor. Alinea makes use of an algorithm to process a client's answers to a series of questions and to make an investment recommendation. The accuracy of the data provided by the client is important to their investment recommendation. Alinea does not verify the information received from the client. Alinea is expressly authorized to rely on information provided by the client when making investment recommendations.

Investment recommendation(s) is/are limited to account(s) of clients maintained on the Alinea App Platform and do not take into consideration client accounts held outside of Alinea. Alinea does not consider a client's personal tax situation when making stock recommendations. Clients should consult with their own tax advisor when considering investing for their own account.

We currently offer only non-discretionary investment management services. Clients retain full investment discretion over the implementation of investment decisions of each stock recommendation. Clients are also free to purchase other stock offered by Alinea that have not been recommended or offered based on a client's interests. Clients are free to accept or reject any recommendation from Alinea.

Following are some of the risks associated with Alinea's investment strategy:

Market Risk

The value of a client's holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad.

Domestic Equity Market Risks

Under strategies utilizing equity securities, clients are subject to the risk that stock prices may fall over short or extended periods of time. Individual companies may report poor results or be negatively affected by industry and/or economic trends and developments. The prices of securities issued by such companies may suffer a decline in response. These factors contribute to price volatility, which is the principal risk of investing in equity securities.

Dollar-Based Transactions and Fractional Shares

A Fractional share program allows clients to purchase securities in dollar amounts rather than share quantities. Trading in fractional shares has unique risks and

limitations that clients should understand prior to participation. Fractional shares may not be liquid. Fractional shares are not transferable. In the event of an account closing or transfer to another firm, the fractional shares will likely need to be liquidated, resulting in potential fees. Fractional shares cannot be put into certificate form and mailed. Holders of fractional shares will not have voting rights for the fraction of a share owned, even if more than .50 shares are in their account.

Investment Strategy and Method of Analysis Material Risks

We cannot guarantee that an investment objective or planning goal will be achieved. As an investor, each client must be able to bear the risk of loss that is associated with their account, which may include the loss of some, or all principal invested.

Company Risk

When investing in securities, there is always a certain level of company or industry-specific risk that is inherent in each company or issuer. For example, there is the risk that a company will perform poorly or have its value reduced based on factors specific to the company or its industry. This is also referred to as unsystematic risk and can be reduced or mitigated through diversification.

Inflation Risk

When any type of inflation is present, a dollar today will not buy as much as a dollar next year because purchasing power is eroding at the rate of inflation.

Use of Algorithms

Alinea incorporates computer-based technology to make investment recommendations primarily through the use of algorithms. Changes to the algorithmic code could have material effects on a client's stock recommendations. Alinea's algorithms may not perform as intended for a variety of reasons, including but not limited to incorrect assumptions, changes in the market, and/or changes to data inputs. Alinea may modify periodically these algorithms, or a computer system's code or underlying assumptions, and these changes may have unintended consequences. Additional information regarding relevant considerations for clients considering an automated digital investment advisory program (sometimes referred to as a "robo advisor") is contained in the Investor Bulletin from the Securities and Exchange Commission available at https://www.sec.gov/oiea/investor-alerts-bulletins/ib_robo-advisers.html.

Cybersecurity Risk

The information and technology systems of Alinea, as well as of key service providers, including third-party vendors, central agents, exchanges, clearing houses, and other financial institutions (including the custodian), are vulnerable to potential damage or

interruption from computer viruses, network failures, computer and telecommunication failures, infiltration by unauthorized persons and security breaches, usage errors by their respective professionals, power outages and catastrophic events such as fires, tornadoes, floods, hurricanes and earthquakes. Alinea and client accounts could be adversely impacted if any of the aforementioned parties is the subject of a cyber- attack or other information security event. Although Alinea has implemented various measures designed to seek to manage risks relating to these types of events, if these systems are compromised, become inoperable for extended periods of time or cease to function properly, it may be necessary for Alinea or a service provider to make a significant investment to fix or replace them and to seek to remedy the effect of such issues. The failure of these systems and/or of disaster recovery plans for any reason could cause significant interruptions in Alinea's ability to transact business on behalf of its clients and could result in a failure to maintain the security, confidentiality or privacy of sensitive data, including personal information. While many investment advisers are subject to the same or similar risks in respect of their operations, these risks are particularly acute with respect to Alinea due to Alinea's fundamental dependence on technology.

Research Data

When research and analyses are based on commercially available software, rating services, general market and financial information, or due diligence reviews, a firm is relying on the accuracy and validity of the information or capabilities provided by selected vendors, rating services, market data, and the issuers themselves. Therefore, while our firm makes efforts to determine the accuracy of the information received, we cannot predict the outcome of events or actions taken or not taken, or the validity of all information researched or provided which may or may not affect the advice regarding or investment management of an account.

Limited Nature of the Recommendations

The use of algorithms carries the risk that changes to the algorithm's code may not have the desired effect with respect to a client's account. While this risk increases if changes to an algorithm are insufficiently tested prior to implementation, even extensively tested changes may not produce the desired effect over time. The App Platform relies on a limited universe of inputs to generate a stock recommendation for each client from a limited universe of possible outputs. In particular, the App Platform currently generates suggested stock purchases based on a client's response to questions provided by the client through the App Platform. Alinea does not verify the completeness or accuracy of such information or consider any information regarding outside assets, concentration, debt, or other accounts a client may have with any third party. The functionality of the App Platform is partly dependent upon information provided by the third-party custodian, and other external sources, meaning that performance of the App Platform could be impacted by issues with the delivery or the accuracy of the information provided.

Limited Nature and Scope of the Service

We do not provide comprehensive financial or tax planning or legal advice. Clients should seek the advice and counsel of their own tax, financial, and legal advisers. Alinea only provides stock recommendations to individual investors. We do not provide investment advice to IRA or tax-exempt investors. We are not responsible for withholding any tax penalties that may apply to our clients or for any state or federal income tax withholding, except as may otherwise be required by applicable law. Alinea's recommendations are limited based on the information clients provide through the App Platform, the limitations of which are further discussed above. Clients should take into consideration the limited nature of the service in evaluating the recommendations provided through the App Platform. Furthermore, the service: (a) is not a complete investment service; (b) does not account for multiple investment goals; (c) does not consider outside assets, concentration, debt, or other accounts a client may have with any third party; (d) offers a limited number of investments; (e) may not be suitable for all investors; and (f) relies on the information provided by clients in providing investment advice and does not verify the completeness or accuracy of such information.

There could be one or more products available in the investment community that are more appropriate than the investment products made available through the App Platform. Given the inherent limitations of the service, clients should carefully consider whether our service is the right investment solution for their savings and investing needs.

Risk of Loss

We cannot guarantee our analysis methods will yield a return. In fact, a loss of principal is always a risk.

You need to understand that recommendations made for your account by us are subject to various market, currency, economic, political and business risks. Despite our best efforts, the investment recommendations we make for you will not always be profitable nor can we guarantee any level of performance. Alinea does not represent, warrant, or imply that the services or methods of analysis used can or will predict future results, successfully identify market tops or bottoms, or insulate clients from major losses due to market corrections or crashes. No guarantees are offered that clients' goals or objectives will be achieved. Further, no promises or assumptions can be made that the advisory services offered by Alinea will provide a better return than other investment strategies.

Investments in securities and other financial instruments involve risk of loss that investors must be prepared to bear. Below are certain risks associated with the strategies discussed above. This is a summary only. The specific risks applicable to a client will depend upon various factors.

Regulatory Changes

It is possible that changes in applicable laws and regulations may affect Alinea's operations. The consequences of additional regulation on the liquidity of markets and the functioning of the service (and, possibly, on Alinea itself) cannot be predicted and may materially affect the investment advisory services offered by Alinea.

Taxes

You are responsible for all tax liabilities and tax-return filing obligations arising from the transactions in your Alinea account. We do not, and will not, offer tax advice to you and we strongly encourage you to seek the advice of a qualified tax professional. You should also understand that we are not responsible for attempting to obtain any tax credit or similar item or preparing and filing any legal document (including, but not limited to, proofs of claim) on your behalf.

Item 9: Disciplinary Information

There are no criminal or civil actions to report. There are no administrative proceedings to report. There are no self-regulatory organization proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

Alinea is not registered as or has a pending applications to become a: broker/ dealer, representatives of a broker/dealer, a Futures Commission Merchant, Commodity Pool Operator, Commodity Trading Advisor. Alinea does not have any material relationships to our advisory business that would present a possible conflict of interest. We do not utilize nor select other advisers or third-party managers.

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

Alinea's ethical and legal duty is to act at all times as a fiduciary to its clients. This means that Alinea puts the interests of its clients ahead of its own and seeks to manage any perceived or actual conflict of interest that may arise in relation to our advisory services. Alinea has adopted a Code of Ethics ("COE"), which is designed to ensure that it meets its fiduciary obligation to clients, enhances its culture of compliance within the firm, and detects and prevents any violations of securities laws.

Alinea's COE establishes standards of conduct for Alinea's officers and employees ("Supervised Persons") and is consistent with the Code of Ethics requirements of Rule 204A-1 under the Investment Advisers Act of 1940, as amended. The COE includes

general requirements that all Supervised Persons comply with their fiduciary obligations to clients and applicable securities laws, and also contains specific requirements relating to, among other things, personal trading, insider trading, conflicts of interest, and confidentiality of client information. Alinea's COE will be provided to any client or prospective client upon request.

Alinea and its employees may purchase, sell, or otherwise enter into transactions for their own accounts in securities and other instruments. Prior to, or simultaneously with, or after such transactions, Alinea may, for its Clients, via the App Platform, provide suggestions for purchasing stock involving any of these same securities or other instruments, and any related securities or instruments (including securities issued by the same issuer, options on such securities or instruments, and instruments convertible into such securities or instruments). Alinea has adopted the Code of Ethics discussed above to address potential conflicts. Subject to certain restrictions, Alinea and each of their employees personally may at any time hold, acquire, increase, decrease, dispose of or otherwise deal with positions in investments in which a Client may have an interest from time to time. Alinea has no obligation to recommend or acquire for a Client account a position in any security which it acquires or recommends on behalf of another Client, or which an employee acquires for his or her own account.

Transactions affected for all Client accounts are not aggregated or combined with employee's personal orders but executed according to DriveWealth's disclosures and are self-directed by the Client. In all instances Alinea will act in the best interests of its Clients.

Past performance is not a guarantee of future returns. Investing in securities involves a risk of loss that the client should be prepared to bear.

Item 12: Brokerage Practices

The custodian is selected based on the transaction fees relative to other custodians and best quality in terms of technology. Additional factors used to choose the custodian are the custodian's support services, reputation, and cost-benefit compared to other custodians. Alinea requires clients to use DriveWealth, LLC ("DriveWealth") as their custodian.

Alinea does not receive any research, products, or services from its custodian or another third-party (known as soft dollars) in connection with client securities transactions. Alinea does not receive referrals from a broker-dealer or third party in exchange for using that broker dealer or third party.

Alinea does not allow clients to direct brokerage.

Item 13: Review of Accounts

Alinea provides its clients with access to their account information via the App Platform. DriveWealth, the client's custodian, is required to send account statements directly to clients no less frequently than quarterly. These statements and reports will be sent directly by DriveWealth to clients at their respective addresses of record or delivered electronically.

On a periodic basis, Alinea will contact each client to request that the profile information previously provided be updated, if appropriate due to changes in circumstance. Alinea will review accounts periodically to identify any accounts with a balance below the minimum balance. However, clients must promptly update the financial and other information they previously inputted through the App Platform if any of financial or other information changes. A client's failure to timely update this information could materially impact the quality and applicability of Alinea's advice and recommendations.

Item 14: Client Referrals and Other Compensation

Alinea does not directly compensate or receive compensation from other entities.

Item 15: Custody

Alinea does not have actual custody of client funds or securities and does not provide custodial services to our clients. Client funds and securities are maintained at an independent qualified custodian as described in Item 4. Clients will receive statements directly from the qualified custodian at least quarterly. We urge clients to carefully review those statements and compare the custodial records to the reports that we provide them. The information in our reports may vary from custodial statements due to accounting procedures, reporting dates or valuation methodologies of certain securities.

Clients will receive account statements from the custodian and are urged to compare their statements to the account information provided by Alinea.

Item 16: Investment Discretion

Alinea does not accept investment discretion of its client's accounts.

Item 17: Voting Client Securities

Alinea does not have, and will not accept, authority to vote client securities. Generally, clients receive their proxies or other solicitations directly from their custodial broker-dealer or a transfer agent, as applicable, and should direct any inquiries regarding

such proxies or other solicitations directly to the sender.

Item 18: Financial Information

Alinea does not require or solicit prepayment of fees by clients six or more months in advance and is therefore not required to include a balance sheet for its most recent fiscal year.

Alinea is not aware of any financial condition reasonably likely to impair its ability to meet contractual commitments to clients and has not been the subject of a bankruptcy petition at any time during the past ten years.