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September 12, 2022

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 February 24, 2022, we submitted our annual updating amendment for fiscal year 2021 and amended Item 4 of our Form ADV Part 2A Brochure to reflect discretionary assets under management of \$0 and non-discretionary assets under management of \$274,012,496.

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

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Item 4 - Advisory Business

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

You may see the term, Associated Person, used throughout this Brochure. As used in this Brochure, this term refers to anyone from our firm who is an officer, employee, and all individuals providing investment advice on behalf of our firm. Where required, such persons are properly registered as investment adviser representatives.

Portfolio Management Services

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

Our investment advice is tailored to meet our clients’ needs and investment objectives. If you decide to hire our firm to manage your portfolio, we will meet with you to gather your financial information, determine your goals, and decide how much risk you should take in your investments. The information we gather will help us implement an asset allocation strategy that will be specific to your goals, whether we are actively investing for you or simply providing you with advice.

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

We will monitor your portfolio’s performance on a continuous basis, and rebalance the portfolio whenever necessary, as changes occur in market conditions, your financial circumstances, or both.

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

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, 2021, we have \$0 in discretionary and \$274,012,496 in non-discretionary assets under management.

Item 5 - Fees and Compensation**Portfolio Management Services Fees**

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

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

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

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

Performance-based fees are based on a share of capital gains on or capital appreciation of the Client's assets. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees. We do not accept performance-based fees or participate in side-by-side management. Our fees are calculated as described in the Fees and Compensation section above, and are not charged on the basis of a share of capital gains upon, or capital appreciation of, the funds in your advisory account(s).

Item 7 - Types of Clients

Alveo provides investment supervisory services and has investment advisory accounts for Individuals and High net worth individuals and corporations. All of Alveo's clients are Non-U.S residents with a concentration of Latin American clients.

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

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

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

- Charting – charting is a technique that attempts to forecast future market moves by studying historical data on charts.
- Fundamental Analysis – fundamental analysis is a technique that attempts to determine a security's value by focusing on underlying factors that affect a company's actual business and its future prospects. The term refers to the analysis of the economic well-being of a financial entity as opposed to only its price movements.
- Technical Analysis – technical analysis is a technique that relies on the assumption that current market data (such as charts of price, volume, and open interest) can help predict future market trends, at least in the short term. It assumes that market psychology influences trading and can predict when stocks will rise or fall.

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

- Long Term Purchases – securities held for over a year.
- Short Term Purchases – securities held for less than a year.
- Trading – securities are sold within 30 days.

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

The investment advice provided along with the strategies suggested by Alveo will vary depending on each client’s specific financial situation and goals. **Investing in securities involves risk of loss that clients should be prepared to bear.** This brief statement does not disclose all of the risks and other significant aspects of investing in financial markets. In light of the risks, you should fully understand the nature of the contractual relationship(s) into which you are entering and the extent of your exposure to risk. Certain investing strategies may not be suitable for many members of the public. You should carefully consider whether the strategies employed will be appropriate for you in light of your experience, objectives, financial resources and other relevant circumstances.

General Investment Risk: All investments come with the risk of losing money. Investing involves substantial risks, including complete possible loss of principal plus other losses and may not be suitable for many members of the public. Investments, unlike savings and checking accounts at a bank, are not insured by the government to protect against market losses. Different market instruments carry different types and degrees of risk and you should familiarize yourself with the risks involved in the particular market instruments you intend to invest in.

Loss of Value: There can be no assurance that a specific investment will achieve its investment objectives and past performance should not be seen as a guide to future returns. The value of investments and the income derived may fall as well as rise and investors may not recoup the original amount invested. Investments may also be affected by any changes in exchange control regulation, tax laws, withholding taxes, international, political and economic developments, and government, economic or monetary policies.

Interest Rate Risk: Fixed income securities and funds that invest in bonds and other fixed income securities may fall in value if interest rates change. Generally, the prices of debt securities rise when interest rates fall, and their prices fall when interest rates rise. Longer term debt securities are usually more sensitive to interest rate changes.

Credit Risk: Investments in bonds and other fixed income securities are subject to the risk that the issuer(s) may not make required interest payments. An issuer suffering an adverse change in its financial condition could lower the credit quality of a security, leading to greater price volatility of the security. A lowering of the credit rating of a security may also offset the security's liquidity, making it more difficult to sell. Funds investing in lower quality debt securities are more susceptible to these problems and their value may be more volatile.

Foreign Exchange Risk: Foreign investments may be affected favorably or unfavorably by exchange control regulations or changes in the exchange rates. Changes in currency exchange rates may influence the share value, the dividends or interest earned and the gains and losses realized. Exchange rates between currencies are determined by supply and demand in the currency exchange markets, the international balance of payments, governmental intervention, speculation and other economic and political conditions. If the currency in which a security is denominated appreciates against the US Dollar, the value of the security will increase. Conversely, a decline in the exchange rate of the currency would adversely affect the value of the security.

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

Concentrated Position Risk: Certain Associated Persons may recommend that clients concentrate account assets in an industry or economic sector. In addition to the potential concentration of accounts in one or more sectors, certain accounts may, or may be advised to, hold concentrated positions in specific securities. Therefore, at times, an account may, or may be advised to, hold a relatively small number of securities positions, each representing a relatively large portion of assets in the account. As a result, the account will be subject to greater volatility than a more sector diversified portfolio. Investments in issuers within an industry or economic sector that experiences adverse economic, business, political conditions or other concerns will impact the value of such a portfolio more than if the portfolio's investments were not so concentrated. A change in the value of a single investment within the portfolio will affect the overall value of the portfolio and will cause greater losses than it would in a portfolio that holds more diversified investments.

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.

Inverse Funds: Inverse mutual funds and ETFs, which are sometimes referred to as "short" funds, seek to provide the opposite of the single-day performance of the index or benchmark they track. Inverse funds are often marketed as a way to profit from, or hedge exposure to, downward moving markets. Some inverse funds also use leverage, such that they seek to achieve a return that is a multiple of the opposite performance of the underlying index or benchmark (i.e., -200%, -300%). In addition to leverage, these funds may also use derivative instruments to accomplish their objectives. As such, inverse funds are highly volatile and provide the potential for significant losses.

Cybersecurity Risks: Our firm and our 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 a business continuity plan 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 are also present for issuers of securities, investment companies and other investment advisers in which we invest, which could result in material adverse consequences for such entities and may cause a client's investment in such entities 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.

Recommendation of Other Advisers: In the event we recommend a third-party investment adviser to manage all or a portion of your assets, we will advise you on how to allocate your assets among various classes of securities or third-party investment managers, programs, or managed model portfolios. As such, we will primarily rely on investment model portfolios and strategies developed by the third-party investment advisers and their portfolio managers. If there is a significant deviation in characteristics or performance from the stated strategy and/or benchmark, we may recommend changing models or replacing a third-party investment adviser. The primary risks associated with investing with a third party is that while a particular third party may have demonstrated a certain level of success in the past; it may not be able to replicate that success in future markets. In addition,

as we do not control the underlying investments in third party model portfolios, there is also a risk that a third party may deviate from the stated investment mandate or strategy of the portfolio, making it a less suitable investment for our clients. To mitigate this risk, we seek third parties with proven track records that have demonstrated a consistent level of performance and success over time. A third party's past performance is not a guarantee of future results and certain market and economic risks exist that may adversely affect an account's performance that could result in capital losses in your account. Please refer to the third-party investment adviser's advisory agreements, Form ADV Brochure, and associated disclosure documents for details on their specific investment strategies, methods of analysis, and associated risks.

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

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February 17, 2022

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
Investment Adviser Representative

Alveo Wealth Management, LLC

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Miami, FL 33131

Tel: (561) 371-0135
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February 17, 2022

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

Disciplinary Information - Item 3

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Mr. Barragan and Alveo. Mr. Barragan has not been the subject of any criminal actions; he has not been the subject of any administrative proceedings before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority; he has not been the subject of any proceedings before any self-regulatory organization; and Mr. Barragan has not been the subject of any proceedings in which his professional attainment, designation, or license was revoked or suspended.

Other Business Activities - Item 4

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

Additional Compensation – Item 5

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

Supervision - Item 6

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

Alveo has implemented a Code of Ethics and an internal compliance program that guides each Associated Person in meeting their fiduciary obligations to clients. Mr. Barragan adheres himself to Alveo's Code of Ethics

and compliance manual as mandated. Clients may contact Marian Stupka at the phone number listed on the cover of this Brochure Supplement, to obtain a copy of Alveo's Code of Ethics. Additionally, Alveo is subject to regulatory oversight by various agencies. These agencies require registration by Alveo and its employees. As a registered entity, Alveo is subject to examinations by regulators, which may be announced or unannounced. Alveo is required to periodically update the information provided to these agencies and to provide various reports regarding firm business and assets under management.

Requirements for State-Registered Advisers - Item 7

This section is not applicable because our firm is SEC registered.

Araceli Fernandez
Investment Adviser Representative

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February 17, 2022

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

Disciplinary Information - Item 3

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Ms. Fernandez and Alveo. Ms. Fernandez has not been the subject of any criminal actions; she has not been the subject of any administrative proceedings before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority; she has not been the subject of any proceedings before any self-regulatory organization; and Ms. Fernandez has not been the subject of any proceedings in which her professional attainment, designation, or license was revoked or suspended.

Other Business Activities - Item 4

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

Additional Compensation – Item 5

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

Supervision - Item 6

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

Alveo has implemented a Code of Ethics and an internal compliance program that guides each Associated Person in meeting their fiduciary obligations to clients. Ms. Fernandez adheres herself to Alveo's Code of Ethics

and compliance manual as mandated. Clients may contact Marian Stupka at the phone number listed on the cover of this Brochure Supplement, to obtain a copy of Alveo's Code of Ethics.

Additionally, Alveo is subject to regulatory oversight by various agencies. These agencies require registration by Alveo and its employees. As a registered entity, Alveo is subject to examinations by regulators, which may be announced or unannounced. Alveo is required to periodically update the information provided to these agencies and to provide various reports regarding firm business and assets under management.

Requirements for State-Registered Advisers - Item 7

This section is not applicable because our firm is SEC registered.

Joaquin Garibay Lopez-Negrete

Investment Adviser Representative

Alveo Wealth Management, LLC

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February 17, 2022

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, Investment Adviser Representative, 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 investment adviser representative 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.