

Item 1 – Cover Page

**Part 2A of Form ADV
Brochure for:**

Ola Invierte, LLC

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August 8, 2023

This Brochure provides information about the qualifications and business practices of Ola Invierte, LLC (“the Firm” or “Ola Invierte”). If you have any questions about the contents of this Brochure, please contact the Firm at the address listed above. 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.

Ola Invierte is a registered investment adviser with the SEC. Registration of an investment adviser does not imply any certain level of skill or training.

Additional information about Ola Invierte is also available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 – Material Changes

This Brochure was prepared in connection with the Firm's initial application for investment adviser registration and renewal and, as such, there are no material changes to disclose. In the future, this Item will disclose a summary of any and all material changes between annual updating amendments to the Form ADV.

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Item 4 – Advisory Business

A. Description of the Advisory Firm

Ola Invierte, LLC (the “Firm” or “Ola Invierte”) is a Delaware limited liability company formed in November 2021. As described in more detail below, Ola Invierte provides advice regarding potential investment plans to investors (the “Investors”) through a mobile application platform. Ola Invierte generates proposed investment allocations in stocks, bonds, and exchange-traded funds (“ETF”s) based on data inputted by Investors, which are designed with the goal of enhancing a particular Investor’s returns.

B. Types of Advisory Services

Ola Invierte sponsors the website and iOS application “Ola”, which allows Investors to build and manage securities portfolios and investment plans. Ola and its associated services are available in Spanish and English. Ola allows Investors to trade stocks, bonds, ETFs, and other public securities on the app, and provides general securities and market information. Individualized investment advice is offered to Investors who enroll in Ola’s Premium Subscription Plan (“Ola Premium”).

Ola generates customized, goal-based investment portfolio recommendations for Ola Premium Investors for, among other things, investments in stocks, bonds, and ETFs. The recommendations are customized for the Investor based on an analysis of data inputted by the Investor, including (1) the amount of an Investor’s desired investment goal (e.g. annual retirement income); (2) the amount of capital currently available for this goal (e.g. \$100,000); (3) the amount of time until the goal needs to be satisfied (e.g. 25 years); (4) the amount of the Investor’s annual savings contributions for goal (e.g. 25,000 / year); and (5) the Investor’s risk tolerance. Ola Invierte’s algorithm, based on analysis of historic pricing and risk data, takes these data points and generates a recommended portfolio, which is a proposed allocation of stocks, bonds, and ETFs, based on the information provided by the Investor. The recommended portfolio serves as a benchmark for the Investor. Investors have full discretion over the securities they choose to trade.

Investors will also have access to investment related periodicals, newsletters, and seminars/workshops on the application to provide them with general financial market information and general education related to investing. Ola Invierte will not provide any investment advice or investment recommendations through these publications or workshops.

Ola Invierte will require Investors establish brokerage accounts with Alpaca Securities LLC, a registered broker-dealer, to maintain custody of Investor assets and to effect trades for their accounts. Ola Invierte is independently owned and operated and not affiliated with Alpaca Securities, LLC.

Because Ola Invierte provides investment advice solely through its apps, it is registering as an adviser with the SEC under Rule 203A-2 under the Investment Advisers Act of 1940, which allows such registration to advisers that (among other things) provide investment advice to their clients exclusively through an interactive website. Ola Invierte is treating the app as a form of website for these purposes. Ola Invierte will not interact with Investors in any other way.

The investment advice an Investor receives rely on the information the Investor provides to Ola Invierte. To the extent any of that information is incorrect, it could negatively affect the quality of an Investor's advice they receive. Ola Invierte has no responsibility for any incorrect, false, or misleading information provided by an Investor or for any investment or financial decision an Investor makes based on that information.

C. Client Tailored Services and Client Imposed Restrictions

Ola Invierte provides tailored advisory services by using its algorithm to recommend investment portfolios based on information provided by the Investor, which are designed to help Investors achieve their investment goals.

Ola Invierte does not execute any trades or make any financial or investment decisions on the Investors' behalf.

D. Wrap Fee Program

Ola Invierte does not participate in wrap fee programs.

E. Amounts Under Management

Ola Invierte does not currently have any assets under management.

Item 5 – Fees and Compensation

A. and B. Fee Schedule and Payment of Fees

Ola Invierte offers its services on a subscription basis. Ola does not charge a fee to users for its basic services which includes creating an account, trading public securities through the app, and access to general securities and market information. Individualized investment advice is offered to Investors who choose to enroll in Ola's Premium Subscription Plan ("Ola Premium") for a fee of \$5 per month.

Costs that are unrelated to the ongoing management of the Investor account will be borne by the Investor. ETFs are subject to investment advisory and other expenses, which will be indirectly paid by the Investor. These fees and expenses are described in each ETFs prospectus.

C. Other Compensation

Ola Invierte does not charge Investors third-party fees and does not receive any other compensation.

Ola Invierte uses Alpaca as its executing broker. Alpaca does not charge a commission on securities transactions therefore there is generally no brokerage fee associated with transactions through Ola.

D. Prepayment of Fees

Ola Invierte does not accept prepayment of fees. Ola Invierte offers its services on a monthly subscription basis.

E. Compensation for the Sale of Securities

Neither Ola Invierte nor its supervised persons accept compensation for the sale of securities or other investment products.

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

The Firm and its related persons do not charge performance-based fees.

Item 7 – Types of Clients

Investors are typically individuals and high net worth individuals.

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

A and B. Methods of Analysis, Investment Strategies

Ola Invierte uses proprietary algorithms to analyze information provided by Investors to recommend investment portfolios. The recommendations are customized for the Investor based on an analysis of data inputted by the Investor on the the iOS application “Ola”. The factors considered include (1) Investor’s desired investment goal (2) amount of capital currently available for the goal (3) investment time horizon (4) annual contributions for the goal; and (5) the Investor’s risk tolerance. Ola Invierte’s algorithm, which is based on analysis of historic pricing and risk data, takes these data points and generates a recommended portfolio, which is a proposed allocation of stocks, bonds, and ETFs based on the information provided by the Investor.

C. Risks of Investments and of Strategies Utilized

Investing in securities involves risk of loss that Investors should be prepared to bear.

Investment and trading risk factors may include:

Risk of Loss. Investing in securities involves risk of loss that Investors should be prepared to bear. The Firm does not represent or guarantee that the services or methods of analysis provided by Ola Invierte can or will predict future results, successfully identify market tops or bottoms, or insulate Investors from losses due to market corrections or declines. Ola Invierte cannot offer any guarantees or promises that the Investors’ financial goals and objectives will be met.

Reliance on Algorithms: Ola Invierte uses proprietary algorithms to analyze information provided by Investors to recommend an investment portfolio. The Firm cannot guarantee that the algorithms used will indeed function as intended or that following the resulting recommendations

will produce profits on investments. The quantitative strategies utilized by the Firm have inherent limitations, including the possibility of human error in the design, data input or implementation process; imperfections of a model that may result in a failure to keep up with changes in the markets and the unpredictable behavior of market participants over time. The risk of errors, malfunctions and anomalies is inherent in each component of the programming process, how those components function together, and how the program absorbs data points provided by the Investor and interpreted by the Firm.

Further, Ola Invierte will have no knowledge of or ability to verify the information entered into its application. If an Investor enters incorrect data, or does not enter complete data, the recommendations generated by the algorithm may not reflect the Investor's investment goals. Similarly, Ola Invierte has no way of knowing what other investments an Investor has, and as a result, the recommendations it produces for an Investor may not be appropriate to Investor's overall portfolio.

Projected Performance. The design of the recommendations and the interactive features of Ola Invierte's platform inherently involve projections with respect to an Investor's goals and the performance of any investment strategy. These projected performance figures are based off the personal details provided by the Investors.

Investors should be aware that any projected performance is inherently speculative, and it is possible if not likely that an Investor's actual returns will diverge from the performance predicted by Ola. Any performance figures provided by Ola Invierte are not a guarantee of an Investor's actual returns, which may be higher or lower than predicted.

Investor Decisions: Ola requires an Investor to make a number of his/her own decisions, including, among others, what information to input into the algorithm, and whether to invest according to the app's investment recommendations. This means that investment returns based on use of the app may vary tremendously, and may or may not achieve Investors investment goals. Investors may make decisions that cause him/her to lose their investment in whole or in part. Ola Invierte recommends that Investors work with their own investment professionals to determine whether and how the program described in this Brochure fits with their investment goals.

Market Risk: The price of a security and/or exchange-traded fund may drop in reaction to tangible and intangible market event and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.

Equity Securities: Investing in individual companies involves investments in common stocks and is subject to the variability and individual risks associated with those stocks.

Mutual Funds and Exchange Traded Funds: Mutual funds and ETFs are professionally managed collective investment systems that pool money from many investors and invest in stocks, bonds, short-term money market instruments, other mutual funds, other securities, or any combination thereof. The fund will have a manager that trades the fund's investments in

accordance with the fund's investment objective. While mutual funds and ETFs generally provide diversification, risks can be significantly increased if the fund is concentrated in a particular sector of the market, primarily invests in small cap or speculative companies, uses leverage (i.e., borrows money) to a significant degree, or concentrates in a particular type of security (i.e., equities) rather than balancing the fund with different types of securities. ETFs differ from mutual funds since they can be bought and sold throughout the day like stock and their price can fluctuate throughout the day. The returns on mutual funds and ETFs can be reduced by the costs to manage the funds. Also, while some mutual funds are "no load" and charge no fee to buy into, or sell out of, the fund, other types of mutual funds do charge such fees which can also reduce returns. Mutual funds can also be "closed end" or "open end". So-called "open end" mutual funds continue to allow in new investors indefinitely whereas "closed end" funds have a fixed number of shares to sell which can limit their availability to new investors.

Exchange Traded Funds Specifically: ETFs are designed to track the performance of a benchmark index. Shareholders are subject to the risks stemming from the individual issuers of the fund's underlying portfolio securities. Shares of ETFs are listed on securities exchanges and transacted at negotiated prices in the secondary market. Generally, ETF shares trade at or near their most recent net asset value ("NAV"), which is generally calculated at least once daily for indexed based ETFs and potentially more frequently for actively managed ETFs.

Cybersecurity Risk. External cybersecurity breaches, including unauthorized access to systems, networks or devices (such as through "hacking" activity); infection from computer viruses or other malicious software code; and attacks that shut down, disable, slow or otherwise disrupt operations, business processes or website access or functionality, may occur. In addition, internal incidents can occur, such as the inadvertent release of confidential information (possibly resulting in the violation of applicable privacy laws). A cybersecurity breach could result in the loss or theft of customer data, the inability to access electronic systems ("denial of services"), loss or theft of proprietary information or corporate data, physical damage to a computer or network system or costs associated with system repairs. Such incidents could cause the Firm or other service providers to incur regulatory penalties, reputational damage, additional compliance costs or financial loss.

The foregoing risks do not purport to be a complete explanation of all the risks involved when Investors utilize Ola. Investors should read all other materials that may be provided by Ola Invierte, and consult with their own advisers prior to utilizing Ola's services.

Item 9 – Disciplinary Information

The Firm and its management persons have not been a party to any legal or disciplinary events that would be material to an Investor's evaluation of the Firm's investment advisory business or the integrity of its management.

Item 10 – Other Financial Industry Activities and Affiliations

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

The Firm will not be registering as a broker-dealer, nor will the Firm have a broker-dealer representative.

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

Neither the Firm nor its management persons is registered or has an application pending for registration as a futures commission merchant, commodity pool operator, or commodity trading adviser.

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

Neither the Firm nor its representatives have any conflicts of interest to disclose.

D. Selection of Other Investment Advisers or Managers

The Firm does not select other investment advisers or managers on the Investor behalf.

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

A. Code of Ethics

The Firm has adopted a Code of Ethics (the “**Code**”) pursuant to Rule 204A-1 under the Advisers Act, as amended. The Code governs the activities of each member, officer, director and employee of the Firm (collectively, “**Employees**”). The Firm holds its Employees to a high standard of integrity and business practices that reflects its fiduciary duty to Investors. The Firm strives to avoid conflicts of interest or the appearance of conflicts of interest in connection with the personal trading activities of its Employees. When persons covered by the Code engage in personal securities transactions, they must adhere to the following general principles as well as to the Code’s specific provisions: (a) at all times the interests of Investors must be paramount; (b) personal transactions must be conducted consistent with the Code in manner that avoids any actual or potential conflict of interest; and (c) no advantage should be taken of any position of trust and responsibility. Employees covered by the Code have certain trading restrictions and reporting obligations of their personal securities transactions. Each Employee is provided with a copy of the Code and must annually certify that he or she has received it and has complied with its provisions. In addition, any Employee who becomes aware of any potential violation of the Code is obligated to report the potential violation to the Chief Compliance Officer.

The Firm will provide a copy of its Code to Investors and prospective Investors upon request. Such a request may be made by submitting a request to the Firm via email at the email address listed on the cover page to this Brochure.

B. Recommendations Involving Material Financial Interests

Neither the Firm nor its related persons recommends to Investors, or buys or sells for Investor accounts, securities in which the Firm or a related person has a material financial interest.

C. Investing Personal Money in the Same Securities as Clients

Ola Invierte's principals may invest in the same securities or ETFs that are part of the recommendations Investors receive through Ola. To address this potential conflict of interest, the Firm requires Employees designated as Access Persons to sign and adhere to the Code and to report personal securities holdings and transactions to the Firm. The Chief Compliance Officer is responsible for conducting a review of and documenting situations that could be construed as conflicts of interest.

Item 12 – Brokerage Practices

Ola Invierte does not execute any trades or make any financial or investment decisions on the Investors' behalf. Ola Invierte requires Investors to use Alpaca as their executing broker. Alpaca does not charge a commission on transactions therefore there is generally no brokerage fee associated with transactions through Ola.

Ola Invierte does not generate "soft dollar" credits through commissions in Investor accounts.

Ola Invierte does not accept directed brokerage arrangements.

Item 13 – Review of Accounts

Ola Invierte provides Investors with continuous access to accounts through the mobile app, which includes information related to portfolio holdings. Investors have discretion on Ola to review and make changes to their recommended investment portfolios at any time for consistency with their time horizon, risk profile and investment objectives.

Item 14 – Client Referrals and Other Compensation

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

The Firm does not directly or indirectly compensate any third party for advice rendered to Investors.

B. Compensation to Non-Advisory Personnel for Client Referrals

The Firm does not directly or indirectly compensate any person for Investor referrals.

Item 15 – Custody

The Firm does not maintain custody of Investor assets. Ola Invierte does not execute any trades or make any financial or investment decisions on the Investors' behalf.

Item 16 – Investment Discretion

Ola Invierte does not execute any trades or make any financial or investment decisions on the Investors' behalf.

Item 17 – Voting Client Securities

The Firm does not vote proxies on behalf of Investor accounts.

Item 18 – Financial Information

A. Balance Sheet

The Firm does not require nor solicit prepayment of more than \$1,200 fees in advance per Investor, and therefore does not need to include a balance sheet with this Brochure.

B. Financial Condition

At this time, the Firm does not have any financial conditions that are reasonably likely to impair its ability to meet contractual commitments to Investors.

C. Bankruptcy Petitions in Previous Years

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

Item 19 – Requirements for State-Registered Advisers

Not applicable.