



# ALIANZA CORP. INVESTMENT ADVISOR

## Part 2A of Form ADV

### Firm Brochure

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954-330-1741

As of: March 12, 2025

This Brochure (the “Brochure”) provides information about the qualifications and business practices of Alianza Corp. Investment Advisor (“Alianza” or “the Firm”). If you have any questions about the contents of this Brochure, please contact us at [Infor@alianzaria.com](mailto:Infor@alianzaria.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (the “SEC”) or by any state securities authority.

Additional information about Alianza CORP. INVESTMENT ADVISOR is also available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You may also request a copy of our Brochure by contacting us at +1 954-330-1741 or [carlos@cimafr.com](mailto:carlos@cimafr.com).

Alianza CORP. INVESTMENT ADVISOR is a registered investment adviser. Registration of an investment adviser does not imply that Alianza or any of our principals or employees possesses a particular level of skill or training.

**Item 2 – Material Changes**

Alianza is required to advise you of any material changes to our brochure since our last annual update.

- Since our last update, there have been no material business change to Alianza, however, on March 1<sup>st</sup> Alianza moved offices from 1200 Brickell Avenue, Miami Florida to 175SW 7Th St Suite 1703, Miami Florida.

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#### **Item 4 – Advisory Business**

Alianza is organized as a corporation under the laws of the State of Florida and is a registered Investment Adviser with the State of Florida. Alianza has been in business since May 2023. Alianza is wholly owned by Alianza Valores, a Colombian corporation registered and regulated as a securities broker/dealer by the Colombian Securities Authority. Alianza Valores is part of the Alianza Group based in Bogotá Colombia. Alianza Group together with its other affiliates in Colombia provide wealth advisory services to high-net-worth individuals and entities in Colombia. Specifically, Alianza Valores provides its clients with advisory services for a wide range of services, such as:

- Trust Services
- Securities Brokerage Services
- Asset Management
- Private Equity Offerings
- Cash Management for entities.
- Pension Fund Management
- Mutual Fund administrations (for Colombian registered Funds)
- Management of Real Estate funds

Alianza's clients are high net worth individuals, organizations with business interests in Latin America and include corporations, financial institutions, private equity funds and private families.

Alianza provides investment advisory services to retail clients who are affluent, high net worth individuals, families, and trusts. The Firm works with clients to help them define appropriate investment objectives and to design and implement an investment process and individualized strategies that seeks to achieve those objectives. The client will be provided with an Investment Policy Statement that will include the recommended asset allocation strategy.

Alianza advisory services include, but are not limited to, asset allocation analysis, instrument and security selection, performance reporting, and portfolio monitoring. Alianza provides advisory services to Clients via personalized non-discretionary and discretionary mandates as well as discretionary services through its digital Wrap Fee Program.

#### **Digital Platform**

Alianza offers a discretionary digital advisory Wrap Fee Program for international clients administered via BCP Global Advisors (BCP Global) as per Alianza's sub advisory agreement with BCP Global. Under the Wrap Fee Program, Alianza clients will pay a single fee for advisory services and other ancillary services. Please refer to the Alianza Wrap Fee Brochure for details of the online digital program including applicable program fees, available at <https://adviserinfo.sec.gov/>. Please be aware that under the Wrap Fee Program, Alianza advises clients to invest in model portfolios that are managed by Alianza and in limited instances on non Alianza managed portfolios. In addition, because we have limited offering of non-Alianza managed portfolios on our digital platform our clients will be more likely to invest in the Alianza managed portfolios. This is a conflict of interest as Alianza will benefit by receiving a greater compensation from increased assets being invested in the Alianza managed portfolios. Please see our Wrap Fee Brochure for more information on the Wrap Fee Program.

### **Non-Discretionary Portfolio's**

Non-discretionary portfolios are investment advisory mandates where Alianza will perform an interview with the client to understand their objective, risk tolerance life circumstances, their comprehensive investment holdings, as well as any guidelines and restrictions the client wishes to establish and their overall financial goals. Based on the information gathered, Alianza will then recommend an initial, as well as an ongoing, investment strategy which may include, but will not be limited to optimal asset allocation, specific investments, specific investment managers, and other strategy considerations. With respect to non-discretionary Clients, if the Client approves Alianza's asset allocation and recommendation, the Firm can arrange for the execution of the approved transaction at the request and on behalf of the Client, if authorized to do so by the Client. Otherwise, it is incumbent upon the client to implement the recommended strategy.

### **Discretionary Portfolios**

Alianza also offers discretionary investment management services to its clients. Clients are asked to provide us with certain information with respect to their current financial holdings, investment objectives, risk tolerance, liquidity needs, and time horizon. Alianza may also inquire as to the restrictions the client wishes to impose on the management of the accounts. From the information that is supplied by the client, Alianza constructs an allocation mix and investment strategy that it believes is in the client's best interest. The investment strategy which may include, but will not be limited to optimal asset allocation, specific investments, specific investment managers, and other strategy considerations. Contrary to the non-discretionary mandates, in a Discretionary mandate Alianza does not need to seek client approval (pre or post approval) for the implementation of the strategy or the rebalancing of the investment strategy. The relationship is governed by the investment management contract and mandate given to the client by Alianza.

Alianza does not have direct custody of client funds or securities. Please see item 15 of this brochure for more detailed information. Clients are required to use Interactive Brokers as their custodian for the Wrap Fee Program. For any other services, clients select the financial institutions that have custody of their assets. Alianza can recommend a particular custodian to our Clients, at their request, but the Firm does not receive any compensation from the custodians for such recommendations (please refer to the section on Brokerage Practices for additional information).

Alianza assists Clients in establishing investment objectives, return expectations, risk tolerance, measuring time horizons for their strategies, liquidity needs, and other Client-specific requirements, which are set forth in the Client's Investment Policy Statement. The Investment Policy Statement also includes specific portfolio management parameters and associated restrictions by instrument type, asset class, sector, and geography, as applicable.

Based on the Investment Policy Statement, Alianza offers investment advisory services regarding the following instruments, and, on occasion, others not included below:

- Fixed income, including, but not limited to, investment grade and high yield corporate bonds
- Municipal securities

- Exchange traded funds (ETF)
- Equity securities: exchange listed, over the counter, and foreign securities
- Private equity funds and direct private equity
- Private debt funds and direct private debt investments
- Real Estate funds and direct real estate investments
- Managed accounts
- Mutual funds whether registered in the United States or Offshore (i.e., UCITS, SICAV's)
- Options and other derivative products

Clients may impose reasonable restrictions on investing in certain securities or types of securities for their account(s). When a client requests certain restrictions, Alianza will review these and determine, in its sole discretion, if the conditions would materially impact the performance or implementation of a management strategy or prove overly burdensome to the Firm's account management efforts before accepting such restrictions. If Alianza determines that the restrictions prove to have a material impact to the strategy designed, Alianza will notify the client that it cannot continue with the advisory relationship.

The Firm currently manages approximately \$12,246,855 net assets on a discretionary basis and \$74,320,576 on a non-discretionary basis as of December 31,2024. Alianza provide continuous and regular supervisory or management services on the nondiscretionary assets it manages.

## **Item 5 – Fees and Compensation**

### **Wrap Fee Program**

Alianza offers digital investment advisory services under a wrap fee program and its fees are a percentage of assets under management. Fees may range to a maximum of 1.75% and can be negotiated depending on portfolio size, investment objectives, strategy, and assets under management and Alianza's earning potential from each client. Fees charged as part of the Wrap Fee Program may vary, please refer to Alianza Wrap Fee Brochure for detailed information.

Fees are calculated based upon the average account value (market value or fair market value in the absence of market value) at the end of each month every quarter. The client agrees to have the advisory fees automatically calculated and deducted monthly from the client's account custody account.

Alianza's fees are inclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred directly by the client. Clients may incur certain charges imposed by custodians, brokers, and other third parties such as fees charged by fund managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic funds fees, and other fees and taxes on brokerage account and securities transactions. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. It is Alianza's policy not to accept retrocession fees from any third non-affiliated party providing services to Alianza's clients.

Under the sub-advisory agreements, Alianza is paid an asset-based monthly fee. The fee is calculated as a percentage of the daily assets under management for each fund and paid on a quarterly basis (Management Fee).

Alianza does not receive a fee based on the performance of the Funds.

Normally, any Investment Advisory Agreement that Alianza enters into is effective as of the day noted on the investment advisory agreement and remains in effect for a continuous period of time. The client or the investment manager may terminate an Agreement by written notice to the other party with a (30) thirty - day advance notice or as agreed upon otherwise between the client and Alianza. If an account, held at the client’s qualified custodian, is to be liquidated as the result of a termination notice, it is understood that the process of liquidation may take up to five (5) trading days, following the date the liquidation request was received by Alianza. Clients may terminate their agreement without penalty, for a full refund, within 5 business days of signing the advisory agreement.

If an agreement is canceled during the billing period, Alianza will charge a prorated fee for the days the agreement was in effect.

**Non-Wrap Fee Program**

Alianza charges Clients an Advisory Fee for services provided. The Advisory Fee is established and defined in the Investment Advisory Agreement between Alianza and the Client (the “Advisory Agreement”). Generally, the Advisory Fee is expressed as a percentage of Assets Under Management (“AUM”), and typically ranges from 0.50% to 1.65% of total AUM, with a minimum annual Advisory Fee. Alianza’ fee schedule is generally as follows:

AUM From	AUM To	%
-	199,999	1.65%
200,000	499,999	1.50%
500,000	999,999	1.25%
1,000,000	2,499,999	1%
2,500,000	4,999,999	0.80%
5,000,000	+	0.50%

There is typically a minimum annual Advisory Fee. In some instances, Advisory Fees are negotiable based upon the types of assets included in a Client’s portfolio, the complexity and size of the portfolio, the services to be provided, and other factors including the nature of the Client’s objectives as articulated in the Investment Policy Statement.

Generally, Advisory Fees are calculated and billed on a quarterly basis, payable in advance. Some Clients' fee schedules and billing procedures may differ from the general process described herein, as provided in such Clients' Advisory Agreements. Clients will authorize Alianza to directly debit fees from client accounts at the custodian. Upon termination of any account, any unearned fees will be promptly refunded.

Advisory Fees are based on the value of the Client's portfolio as reported by the Client's custodians, third-party fund managers, and other independent pricing services. Fees are calculated based on the average portfolio value on the last day of the previous billing period.

Clients agree to the terms of their fee calculation methodology and billing in the Client Advisory Agreement with Alianza.

Clients may also incur certain expenses, such as brokerage commissions and markups, margin interest (if applicable), currency exchange costs, transfer of asset costs and other transactions costs, imposed by the transacting broker-dealers ("Brokers"), custodians, third-party investments, and other third parties. These other expenses are not included in the Advisory Fee and are borne separately by the Client to the extent incurred (please refer to the Brokerage Practices section for additional information). Alianza may recommend investing a portion of a client's assets in shares of mutual funds or other investment companies, including exchange traded funds, as well as private funds. Assets invested in these funds bear other additional fees and expenses, which may include but are not limited to, expenses of organizing the funds, administration, accounting and tax, audit, legal, and filings and regulatory compliance. When investing in these types of securities, Alianza will recommend that clients invest in the most costs effective share class. Clients invested in these funds should refer to the applicable funds offering documents or prospectus for complete information on other fees and expenses.

In addition to fees, Clients may be responsible for certain out-of-pocket expenses for reasonable and direct costs incurred by Alianza on the Client's behalf, as directed by the Client. These out-of-pocket expenses include payments made on behalf of a Client for Client expenses such as postage costs, utility bills, or other miscellaneous third-party expenses. All out-of-pocket expenses are pre-approved by the Client, in writing, before Alianza pays them. Alianza provides an invoice for such services, which is due upon receipt.

Clients should note that similar advisory services can or cannot be available from other registered investment advisors for similar or lower fees. The size of an account and the nature of the advisory services provided factor into the fees charged.

#### **Item 6 – Performance-Based Fees and Side-by-Side Management**

Alianza does not charge performance-based fees to Clients.

#### **Item 7 – Types of Clients**

For its Wrap Fee Program, Alianza recommends a minimum account size of \$10,000. For all other services, Alianza generally provides investment advisory services to Clients who are affluent, high net worth individuals, families, and trusts that have a minimum of \$150,000 in investable assets. On certain instances, Alianza may provide its services to potential clients with less than \$150,000 in investable assets.

Factors to consider when making this determination is the type of services requested, the type of investment strategy sought, and the relationship the potential client may have with Alianza and its affiliates.

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

Alianza gathers and analyzes Client information, such as investment objectives, investment experience, financial circumstances, and risk tolerances. Alianza' investment philosophy is built around the concept of helping Clients achieve their investment objectives and goals in a manner that emphasizes liquidity, risk measurement and management, and investment cost efficiency. This process begins with the formulation of a broad asset allocation, first determined through a top-down process to establish long-term target allocations by asset class and is followed by a bottoms-up analysis of individual, investable instruments.

***Investing in securities involves the risk of loss of capital that clients should be prepared to bear. Please carefully review this section on Investment Risks.***

##### **A. Methods of Analysis**

Based on a Client's risk tolerance assessment, investment objectives, financial wherewithal (including net worth, liquid net worth and cash flow), life events and preferences, assets are allocated across traditional asset classes, asset types, and individual investments. In selecting individual investments, Alianza' methods of analysis include:

*Qualitative Analysis.* This analysis is of particular relevance when evaluating third-party fund managers and fund management companies, and may include analysis of regulatory records, public records, background research, third-party fund manager team profiles, hiring processes, reference checks, audit results, and other analyses.

*Statistical Analysis.* This involves the analysis of past market data, primarily price, volume, and volatility data, as well as statistical analysis based on that raw data. This statistical analysis may include, but is not limited to, correlations, beta, alpha, stress testing, peer benchmarking, and other analytical tools.

*Cyclical Analysis.* This involves the analysis of business cycles to seek favorable conditions for buying and/or selling a security, sector, geography, or asset class. Investing in securities involves a substantial degree of risk of loss that Clients should be prepared to bear. All investments carry the risk of loss and there is no guarantee that any investment strategy will meet its objective.

##### **B. Investment Strategies**

For the Wrap Fee Program, Alianza will primarily provide investments in Exchange Traded Funds (ETF) and Undertakings for Collective Investment in Transferable Securities (UCITS) in constructed portfolios. For all other services, Alianza emphasizes the need for disciplined, long-term investment strategies (involving securities typically held for at least a year) in order to achieve Clients' objectives. Nevertheless, Alianza will selectively and occasionally use short-term investments (securities held less than a year) and trading (securities held for less than 30 days) for tactical reallocations in an effort to manage or moderate risk or to attempt to capture a specific investment opportunity. Alianza can utilize one or more of these

investment strategies in an effort to achieve the risk-adjusted returns as articulated in the Client's Investment Policy Statement.

#### C. Risk of Loss Fixed-Income Securities.

Alianza sometimes recommends investments in bonds or other fixed-income securities (or funds that hold these type of securities) to certain Clients, including, without limitation, sovereign debt, investment grade corporate debt securities, and "higher yielding" (and, therefore, higher risk) debt securities (or funds that hold these types of securities). Such securities may be below "investment grade" and may face ongoing uncertainties and exposure to adverse business, financial, or economic conditions that could lead to the issuer's inability to make timely interest and principal payments. The market values of some of these lower rated debt securities tend to reflect individual corporate developments to a greater extent than that of higher rated securities, which react primarily to fluctuations in the general level of interest rates and tend to be more sensitive to economic conditions than higher rated securities. Issuers that issue lower rated debt securities are often highly leveraged and may not have access to more traditional methods of financing. Trading in such securities may be limited or disrupted by an economic recession, resulting in an adverse impact on the value of such securities. In addition, it is likely that any such economic downturn could adversely affect the ability of the debt issuers to repay principal and pay interest thereon and, therefore, increase the incidence of default for such securities. In the event of a default, there is the risk of losing most or all of the assets invested in such defaulted security.

#### D. ETFs.

Alianza also recommends investments in ETFs to certain Clients. ETFs are hybrid investment companies that may be registered as open-end investment companies or unit investment trusts, but which possess some of the characteristics of closed-end funds. ETFs often hold a portfolio of common stocks, or bonds, which is intended to track the price and dividend (or interest) performance of a particular index. Certain ETFs are actively managed, and the performance of such entities will be dependent upon third-party managers. The market price for ETF shares may be higher or lower than the ETF's net asset value. With regard to sales not conducted in the market (which typically require the sale of a larger number of shares), the sale and redemption prices of ETF shares purchased from the issuer are based on the issuer's net asset value. The total return on ETF investments will be reduced by the operating expenses and fees of such investment companies, including advisory fees.

#### E. Other Risks.

Additional risks involving Alianza' investment strategies include, but are not limited to:

*General Economic and Market Conditions.* General economic or market conditions may adversely affect the investments recommended to Clients. In addition, a downturn or contraction in the economy or in the capital markets, or in certain industries or geographic regions thereof, may restrict the opportunity to liquidate any such investments, each of which could prevent Clients from meeting their investment objectives.

*Illiquid Investments.* Certain investments may be illiquid with no assurance that Clients will be able to realize on any such investment in a timely manner. Illiquidity may result from the absence of an established market for the investments, as well as legal or contractual restrictions on the investment's resale.

*Private Funds.* Alianza recommends investments in private funds to certain clients. Investments in private funds involve risks distinct from those of publicly traded securities. Specific risks are explained in more detail with clients for whom we recommend investing in private funds. Also, clients who invest in private funds will receive copies of the private funds' offering documents, which also discuss the risks of such investments.

*Foreign Investments.* Alianza may invest in opportunities located in countries outside the US. Accordingly, the business and financial results of Clients could be adversely affected due to social or judicial instability, acts or threats of terrorism, changes in governmental policies or policies of central banks, expropriation, nationalization and/or confiscation of assets, price controls, fund transfer restrictions, capital controls, exchange rate controls, taxes, inadequate intellectual property protection, unfavorable political and diplomatic developments, changes in legislation or regulations and other additional international developments or restrictive actions.

*Cyber Security Breaches and Identity Theft.* Cybersecurity incidents and cyber-attacks have been occurring globally at a more frequent and severe level and will likely continue to increase in frequency in the future. The information and technology systems of Alianza and their respective investments may be vulnerable to 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. Although Alianza has implemented disaster recovery and business continuity plans to manage risks relating to these types of events, the failure of these systems and/or of disaster recovery plans for any reason could lead to an interruption in Alianza' operations which may impact the provision of investment advice or other services.

## **Item 9 – Disciplinary Information**

Alianza and its employees have not been involved in any legal or disciplinary events that would be material to an evaluation of Alianza' advisory business or the integrity of the Firm's management. You may research both Alianza's disciplinary history and that of its associated persons, including any outside business activity and conflict of interest by going to the Securities and Exchange Commission's Public Invest site at: [www.investor.gov](http://www.investor.gov).

## **Item 10 – Other Financial Industry Activities and Affiliations**

### **A. Registration as a Broker/Dealer or Broker/Dealer Representative**

Carlos Gonzalez, the firm's Chief Compliance Officer, serves as outsourced Compliance Officer. We do not believe that the relationship creates a conflict with Alianza because Gonzalez does not manage investments with any FINRA registered Broker-Dealers or State or SEC/State Registered Investment Advisors. Mr. Gonzalez is Managing Director of Cima Financial Regulation Consultants, which provides Regulatory Compliance, Anti-Money Laundering, and Financial Operations consulting services. Currently there are no other representatives of the firm that are registered as FINRA member brokers/dealers. Registered representatives may offer securities and receive normal and customary commissions as a result of securities transactions. Therefore, a conflict of interest may arise as these commissionable

securities sales may create an incentive to recommend products based on the compensation they may earn and may not necessarily be in the best interests of the client.

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

Neither Alianza nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

**C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests**

As stated previously, Alianza is part of the Alianza Group based in Bogotá, Colombia. Its affiliates in Colombia provide companies and high net worth individuals with securities brokerage, wealth management and financial planning services. ALIANZA Group provides its clients with advisory services for a wide range of corporate finance situations.

Alianza Group's clients are organizations with business interests in Latin America and include corporations, financial institutions, private equity funds and private families.

**D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections**

Alianza currently does not engage in any sub advisory business that we believe would present a conflict.

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

ALIANZA has adopted a Code of Ethics (the "Code") that imposes on each employee a duty to place the interests of Clients first. The Code requires officers, owners, and employees to, among other things, report to the Chief Compliance Officer ("CCO") any actual or potential conflict of interest relating to any Firm Client. The Code also imposes restrictions and safeguards on the reporting and use of material, non-public information.

The Code requires all officers, owners, and employees of the Firm to report monthly, quarterly, and annually their own and immediate family members' security holdings and transactions to the CCO. In addition, supervised people of the Advisor are subject to pre-clearance of transactions for their own personal account. This is done so that the CCO may review the securities transactions to identify possible conflicts of interest and address these. If deemed material, the CCO has the authority to not approve a transaction in order to avoid a potential conflict of interest.

**Prevention of Insider Trading**

Alianza has adopted policies designed to prevent insider trading that are more fully described in the Code. Adviser's policy on insider trading applies to securities trading and information handling by all Supervised Persons (including spouses, minor children and adult members of their households and any other relative of a Supervised Person on whose behalf Supervised Person is acting) for their own account or the account of any client of the Adviser.

Alianza takes its obligation to detect and prevent insider trading with the utmost seriousness. Alianza may impose penalties for breaches of the policies and procedures contained in the Code, even in the absence

of any indication of insider trading. Depending on the nature of the breach, penalties may include a letter of censure, profit “give ups,” fines, referrals to regulatory and self-regulatory bodies and dismissal.

#### Personal Securities Transactions

##### Periodic Reports

As more fully described in the Code, “access persons” are required to submit reports detailing their personal securities holdings to the Chief Compliance Officer on an initial basis, and thereafter on a quarterly and annual basis.

As an alternative to submitting quarterly transaction reports, Adviser requires persons who are “access persons” to submit brokerage statements or trade confirmations as long as such documents contain the information required under Rule 204A-1(b)(2)(i)(A)-(E) under the Advisers Act.

##### Initial Public Offerings and Limited Public Offerings

Access Persons must obtain prior written approval from the Chief Compliance Officer before investing in initial public offerings (“IPOs”) or limited offerings (i.e., private placements).

##### Review of Personal Securities Reports

The Chief Compliance Officer (or designee) is responsible for reviewing the Access Person’s Quarterly Transaction Reports as well as the Initial Holdings Report and the Annual Holdings Report as part of the Adviser’s duty to maintain and enforce its Code.

##### Outside Business Activities and Private Investments of Employees

Unless otherwise consented by the Chief Compliance Officer, all employees are required to devote their full time and efforts to the Adviser’s business. As such, no person may make use of either his or her position as an employee or information acquired during employment or make personal investments in a manner that may create a conflict, or the appearance of a conflict, between the employee’s personal interests and Adviser’s interests. Accordingly, every employee is required to complete a disclosure form and have the form approved by the Chief Compliance Officer prior to serving in any of the capacities or making any of the investments more fully described in the Code.

##### Reporting Violations

All Supervised Persons (any officer, director, partner, and employee of Adviser) are required to report actual or known violations or suspected violations of the Adviser’s Code promptly to the Chief Compliance Officer or his designee.

##### Acknowledgement of the Code

Each employee will execute a written statement certifying that the employee has (i) received a copy of the Adviser’s Code; (ii) read and understands the importance of strict adherence to such policies and procedures; and (iii) agreed to comply with the Code.

##### Training and Education

All Supervised Persons, i.e., all employees, are to receive training on complying with the Code on an annual basis as part of Adviser's annual employee compliance review meeting to ensure that all employees fully understand their duties and obligations and how to comply with the policies and procedures.

#### Participation or Interest in Client Transactions and Associated Conflicts of Interest

Alianza may recommend or invest in securities, including funds, issued, or managed by its affiliates (or where the affiliate acts as general partner) in which its affiliates have a material financial interest. This is a conflict of interest and while Alianza does not receive any special compensation for recommending such securities, Alianza has implemented policies that require personnel who develop advice and recommendations for clients to render only disinterested and impartial advice to clients and to comply with other fiduciary obligations, including having an adequate basis in fact for all recommendations and an obligation to recommend only investments that are suitable for each particular client.

The potential conflicts of interest involved in any such transactions are generally governed by the Code of Ethics. Pursuant to the stipulations of the Code of Ethics, Alianza or a related person may buy or sell for itself securities that it also recommends to clients. The potential conflicts of interest involved in such transactions are governed by the Code, which establishes the pre-approval of transactions and sanctions if its requirements are violated and requires that Adviser and employees place the interests of Alianza's clients above their own.

#### **Item 12 – Brokerage Practices**

Currently, Alianza requires that clients under its Wrap Fee Program use Interactive Brokers, LLC. (IBKR) as their custodian and broker of record. IBKR is a SEC registered broker/dealer member of FINRA and the SIPC. They provide custody, trading and clearing services to clients on our digital platform. IBKR has policies and procedures to ensure the best execution standards for all transactions executed through its platform. Alianza does not receive any compensation or has any soft dollar arrangement with IBKR. For more information on the relationship between Alianza and IBKR please see the Alianza Wrap Fee Program brochure.

For all other services, clients generally selects their own Broker and Custodian for the implementation of the Firm's recommendations. However, the Client may ask the Firm to evaluate the quality of the Client's relationship with its current Broker(s) and/or recommend a different Broker. In making such a recommendation, the Firm will evaluate the Client's needs, as disclosed to the Firm, and will focus primarily on the financial strength, execution costs, and responsiveness of the Broker. However, such Clients are advised that they must independently evaluate these Brokers before opening an account or transacting business, and that they are not under any obligation to effect business through any recommended firm.

While Alianza places utmost urgency in obtaining client orders in an expedited manner there may be instances where despite best efforts it may not receive client approval in a timely manner (i.e., client not available). This could result in non-discretionary Clients receiving more or less favorable execution prices on the same security and may result in potential differences in performance for the same security.

There may be instances where a client in a non-discretionary relationship has granted Alianza authority to transmit orders to the custodian on its behalf. In cases where Alianza is authorized to order transactions

on behalf of Clients it will only transmit orders that have been approved by the client. In these instances, Alianza will not be deemed to have discretion over the relationship.

When applicable, the Firm will seek to obtain “best execution,” the best available combination of execution, price (which includes the cost of the transaction), and other factors, among each Client’s list of approved Brokers. In seeking best execution, the Firm takes into account all factors it deems relevant including, but not limited to, the financial stability and reputation of the particular Broker, the ability to achieve prompt and reliable executions at favorable prices, and the operational efficiency with which transactions are effected. In instances where the client has a single custodian, Alianza will enter the transactions with that custodian and will monitor the competitiveness of transaction execution.

On occasion, Clients require that their financial assets remain in the custody of various financial institutions that are not able to implement Alianza’ recommendations. In such instances, Alianza will select from the investment options available at such institutions in order to implement the Client’s investment strategy. In these circumstances, direction by a Client to use a particular financial institution may result in higher costs, less favorable investments, and (materially) different performance than if Alianza could freely recommend investments not limited to a particular financial institution or platform.

Alianza executes all Client trades through each Client’s custodial Broker(s), or other Brokers approved by Clients. ALIANZA does not affect transactions with Brokers that have not been approved in advance by the Client. The Firm will attempt to negotiate lower commission schedules for Clients where possible. However, the most favorable execution may not be obtainable at all custodial Brokers, which may cost Clients more money.

The Firm’s business model does not support aggregating orders among Client accounts outside of the Wrap Fee Program. This may or may not result in some Clients paying higher brokerage commissions because of the Firm’s inability to reduce transaction costs through order aggregation. In addition, directed brokerage may result in Clients receiving less favorable prices. However, in the event of the purchase of a new issue, the sale of a particular security, or other investment related reasons, Alianza may aggregate orders in an attempt to receive a better execution price for its clients.

Notwithstanding, Alianza seeks to allocate orders fairly between Clients and has established trade order procedures for non-discretionary accounts. Trade approvals from non-discretionary Clients are queued and executed in the order in which they are received. The use of different executing Brokers will likely result in some Clients paying different Broker-imposed trade fees compared to other Clients. In addition, the timing in which transactions are affected by various Brokers may result in different execution prices on transactions.

The Firm does not have any soft dollar relationships.

### **Item 13 – Review of Accounts**

For the Wrap Fee Program, Alianza provides all Clients with continuous access via website and mobile app where Clients can access their Account documents, such as account statements, and review their time-weighted and money-weighted returns. Clients may also receive periodic e-mail communications describing portfolio performance, Account information, and product features. Alianza software-based investment advisory service assumes a client’s portfolio will not stay optimized over time and must be

periodically rebalanced back to its target allocation. Alianza software continuously monitors and periodically rebalances each client's portfolio that is fully discretionary.

Alianza will periodically review samples of client portfolios not less than annually to ensure that the software is meeting its objectives. The review will be conducted by the Chief Compliance Officer or designee. Additional reviews may be triggered by changes in an account holder's personal, tax, or financial status.

For all other services, Alianza' registered representatives and affiliated persons monitor Clients' portfolios on an ongoing basis, based on the service agreement with each client. At least one primary representative is assigned to each Client. Alianza uses tools to monitor, record, analyze, and report estimated and unaudited Client account performance on a daily basis.

Pricing data used for calculating performance is provided by the Client's custodians, third-party fund managers, and other independent pricing services.

At least quarterly, CCO or designee will evaluate the performance of Client portfolios on an absolute, relative, and for compliance with the Client's Investment Policy Statement. At least annually, the CCO or designee will review each Client's Investment Policy Statement to confirm that it remains consistent with the Client's stated goals and objectives.

#### **Item 14 – Client Referrals and Other Compensation**

Alianza does not receive any economic benefit from someone who is not a client for providing investment advice or other advisory services to its clients.

Alianza has entered into promoters agreement with its affiliate Alianza Valores in Colombia. As a result, Alianza compensates its affiliated company for promoting its services and for Client referrals. Clients that are referred to Alianza are provided with full disclosure on the referral agent and fees, this, in addition to providing other regulatory disclosures. Please be aware that this promoters agreement is a conflict as clients are referred by individuals who have an incentive to do so. We mitigate this risk by only providing investment advisory services to clients when we believe it is in their best interest.

#### **Item 15 – Custody**

Alianza does not have custody of any Client funds or securities, is not a qualified custodian, and does not provide custodial services to its clients. Clients select the Broker(s) or other qualified custodian except in the Wrap Fee Program to provide such services. In some instances, and if specifically asked, Alianza may recommend a particular custodian to its clients, but the Firm does not receive any compensation, other services, or benefits from the custodians or their affiliates for doing so. Clients receive statements directly from the Broker(s) or other qualified custodian that holds and maintains the Clients' funds and securities. Alianza urges Clients to carefully review such statements and compare such official custodial records to any reports provided by the Firm. However, under Florida State Law and as a consequence of the authority to make withdrawals from client accounts to pay advisory fees Alianza is deemed to have constructive custody. In this regard the firm provides the following safeguards:

1. The firm obtains written authorization from the client to deduct advisory fees from the account held with the qualified custodian.

**Item 16 – Investment Discretion**

For discretionary managed accounts, Alianza receives discretionary authority from the client at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account.

When selecting securities and determining amounts, Alianza observes the investment policies, limitations, and restrictions of the clients for which it advises. Investment guidelines and restrictions must be provided to Alianza in writing.

**Item 17 – Voting Client Securities**

Alianza does not have voting authority with respect to Client securities. Clients should receive all proxy materials from their account Broker or other qualified custodian. Clients are responsible for receipt and voting of proxies for all securities maintained in their portfolios. Upon a Client's request, the Firm may provide information and advice to such Client regarding a particular vote by proxy, but Clients retain the responsibility for the determination and the actual act of voting.

From time to time, Alianza may receive notices regarding class action lawsuits involving securities that are or were held by Clients. As a matter of policy, Alianza can assist Clients in gathering documentation, but refrains from serving as the lead plaintiff in class action matters and from submitting proofs of claim unless Alianza has accepted the authority to do so through the Client's Investment Advisory Agreement.

**Item 18 – Financial Information**

Alianza does not collect advance fees of \$500 or more for services to be performed six months or more in the future. Alianza is not aware of any financial condition that is reasonably likely to impair its ability to meet its contractual commitments to Clients and has never been subject to a bankruptcy petition.

**Item 19 – Requirements for State-Registered Advisors**

Information about Investment Advisor Representatives of Alianza is provided in their individual ADV 2B disclosure brochure. Alianza does not charge performance-based fees for its investment advisory services. The fees charged by Alianza are not based upon the capital appreciation of the funds or securities held by any client.

Brochure Supplement (Part 2B of Form ADV)

**Carlos Gonzalez**

**ALIANZA CORP. INVESTMENT ADVISOR**

1655 North Commerce Parkway, Weston FL, 33327

(954) 727-3117

As of: March 12, 2025

**This brochure supplement provides information about Carlos Gonzalez that supplements the ALIANZA CORP. INVESTMENT ADVISOR brochure. You should have received a copy of that brochure. Please contact (954) 727-3117 or carlos@cimafr.com if you did not receive ALIANZA's Investment's brochure or if you have any questions about the contents of this supplement.**

**Additional information about Carlos Gonzalez is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

Carlos Gonzalez:

**Item 2 - Educational Background and Business Experience Education:**

- Born 1972

Education:

- Kent College of Law (May 1998)

Business Experience:

- CIMA Financial Regulation Consultants, LLC
  - Managing Director/ Founder (March 2019 to Present)
- The Citi Private Bank
  - Investment Supervision Head for the Americas (January 2017 to February 2019)
- Citibank N.A. and Citi Global Market, Inc.
  - Investment and Banking Risk and Control Execution Head (June 2015 to December 2016)
- Citi Global Markets, Inc., and Citibank N.A.
  - Head of Investment Supervision for Latin America / Senior Vice President (March 2010 to May 2015)
- Citibank, N.A.
  - Chief Compliance Officer / Vice President (January 2006 to March 2010)
- Popular Securities, Inc.
  - Compliance Manager/ Vice President (October 2000 to January 2006)
- Government of Puerto Rico Office of the Commissioner of Financial Institutions
  - Legal Counsel (1998 – October 2000)

**Item 3 - Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice.

No information is applicable to this Item.

**Item 4 - Other Business Activities**

Mr. Gonzalez has been hired through CIMA Financial Regulatory Consultants, LLC to provide outsourced Chief Compliance Officer services to the firm. Through this arrangement, Mr. Gonzalez can serve as a Chief Compliance Officer or consultant to other broker dealers or investment advisor firms.

**Item 5 - Additional Compensation**

None

**Item 6 - Supervision**

Ultimately, the Vice President is responsible for complete oversight of Alianza's activity. Through delegation to the Chief Compliance Officer ("CCO"), the CCO reviews all trades and enforces adherence to applicable laws, regulations, and firm policies regarding discharge of the supervised person's duties. Suspected violations are referred to the proper channels within the firm for further investigation and, if necessary, disciplinary action.

Luz Botero – Vice President – (954) 330-1741

Carlos Gonzalez - Chief Compliance Officer – (954) 727-3117

#### **Item 7 – State Registered Advisers**

Mr. Gonzalez has NOT been involved in any of the events listed below.

- An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
  - an investment or an investment-related business or activity.
  - fraud, false statement(s), or omissions.
  - theft, embezzlement, or other wrongful taking of property.
  - bribery, forgery, counterfeiting, or extortion; or
  - dishonest, unfair, or unethical practices.
  
- An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
  - an investment or an investment-related business or activity.
  - fraud, false statement(s), or omissions.
  - theft, embezzlement, or other wrongful taking of property.
  - bribery, forgery, counterfeiting, or extortion; or
  - dishonest, unfair, or unethical practices.
  
- Mr. Gonzalez has not been the subject of a bankruptcy.

Brochure Supplement (Part 2B of Form ADV)

**Luz Stella Botero**

**ALIANZA CORP. INVESTMENT ADVISOR**

1200 Brickell Avenue, Miami Florida

(954) 330-1741

As of: March 12, 2025

**This brochure supplement provides information about Luz Botero that supplements the ALIANZA CORP. INVESTMENT ADVISOR brochure. You should have received a copy of that brochure. Please contact (954) 330-1741 or carlos@cimafr.com if you did not receive ALIANZA's Investment's brochure or if you have any questions about the contents of this supplement.**

**Additional information about Luz Botero is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

Luz Botero:

**Item 2 - Educational Background and Business Experience Education:**

- Born 1975

Education:

- Universidad Externado de Colombia
  - Degree in Finance and International Business
  - Masters in international business with a focus on Capital Markets

Business Experience:

- Alianza Corp. Investment Advisor
  - Vice President (February 2023-Present)
- Self-Employed
  - Daytrader for Personal Accounts (November 2010 to January 2023)

**Item 3 - Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice.

No information is applicable to this Item.

**Item 4 - Other Business Activities**

None

**Item 5 - Additional Compensation**

None

**Item 6 - Supervision**

Ultimately, the Vice President is responsible for complete oversight of Alianza's activity. Through delegation to the Chief Compliance Officer ("CCO"), the CCO reviews all trades and enforces adherence to applicable laws, regulations, and firm policies regarding discharge of the supervised person's duties. Suspected violations are referred to the proper channels within the firm for further investigation and, if necessary, disciplinary action.

Luz Botero – Vice President – (954) 330-1741

Carlos Gonzalez - Chief Compliance Officer – (954) 727-3117

**Item 7 – State Registered Advisers**

Ms. Botero has NOT been involved in any of the events listed below.

- An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:

- an investment or an investment-related business or activity.
  - fraud, false statement(s), or omissions.
  - theft, embezzlement, or other wrongful taking of property.
  - bribery, forgery, counterfeiting, or extortion; or
  - dishonest, unfair, or unethical practices.
- An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
  - an investment or an investment-related business or activity.
  - fraud, false statement(s), or omissions.
  - theft, embezzlement, or other wrongful taking of property.
  - bribery, forgery, counterfeiting, or extortion; or
  - dishonest, unfair, or unethical practices.
- Ms. Botero has not been the subject of a bankruptcy.

Brochure Supplement (Part 2B of Form ADV)

**Margarita Villaveces**

**ALIANZA CORP. INVESTMENT ADVISOR**

1200 Brickell Avenue, Miami Florida

(954) 330-1741

As of: March 12, 2025

**This brochure supplement provides information about Margarita Villaveces that supplements the ALIANZA CORP. INVESTMENT ADVISOR brochure. You should have received a copy of that brochure. Please contact (954) 330-1741 or [carlos@cimafr.com](mailto:carlos@cimafr.com) if you did not receive ALIANZA's Investment's brochure or if you have any questions about the contents of this supplement.**

**Additional information about Margarita Villaveces is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

Margarita Villaveces:

**Item 2 - Educational Background and Business Experience Education:**

- Born 1999

Education:

- George Washington University
  - Degree in Bachelor of Science in Finance

Business Experience:

- Alianza Corp. Investment Advisor
  - Advisor (June 1st, 2023-Present)

**Item 3 - Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice.

No information is applicable to this Item.

**Item 4 - Other Business Activities**

None

**Item 5 - Additional Compensation**

None

**Item 6 - Supervision**

Ms. Villaveces is supervised by Ms. Luz Stella Botero, Vice President. Ultimately, the Vice President is responsible for complete oversight of Alianza’s activity. Through delegation to the Chief Compliance Officer (“CCO”), the CCO reviews all trades and enforces adherence to applicable laws, regulations, and firm policies regarding discharge of the supervised person’s duties. Suspected violations are referred to the proper channels within the firm for further investigation and, if necessary, disciplinary action.

Luz Botero – Vice President – (954) 330-1741

Carlos Gonzalez - Chief Compliance Officer – (954) 727-3117

**Item 7 – State Registered Advisers**

Ms. Villaveces has NOT been involved in any of the events listed below.

- An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
  - an investment or an investment-related business or activity.
  - fraud, false statement(s), or omissions.
  - theft, embezzlement, or other wrongful taking of property.
  - bribery, forgery, counterfeiting, or extortion; or
  - dishonest, unfair, or unethical practices.
  
- An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
  - an investment or an investment-related business or activity.
  - fraud, false statement(s), or omissions.
  - theft, embezzlement, or other wrongful taking of property.
  - bribery, forgery, counterfeiting, or extortion; or
  - dishonest, unfair, or unethical practices.
  
- Ms. Villaveces has not been the subject of a bankruptcy.