



# ALPHAWAVE FINTECH

M E E T I N G   Y O U   W H E R E   Y O U   A R E

## Form ADV Part 2A Brochure

**January 1<sup>st</sup>, 2025**

This brochure provides information about the qualifications and business practices of Alphawave Fintech and its Investment Adviser Representatives. If you have any questions about the contents of this brochure, please contact Sebastián Garcés at (512) 537-4009 or email us at: [alphawavefintech@outlook.com](mailto:alphawavefintech@outlook.com)

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any State securities authority. Registration of an investment adviser does not imply any level of skill or training.

Additional information about Alphawave Fintech and our Investment Advisor Representatives (IARs) is available on the SEC's website at: [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) Our Firm has one Investment Advisor Representative and supervising principal: Sebastián Garcés.

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## **ITEM 2 - MATERIAL CHANGES**

This section will contain any amendments or material changes to our ADV Part 2 from our last annual update filing.

As of January 1st, 2025, our Firm held a total of \$741,655 in discretionary managed accounts and \$0 in non-discretionary accounts.

No investment minimums are required to open a managed account.

### ITEM 3 - TABLE OF CONTENTS

ITEM 1 - Cover Page.....	1
ITEM 2 - Material Changes.....	2
ITEM 3 - Table of Contents.....	3
ITEM 4 - Advisory Business.....	4
ITEM 5 - Fees & Compensation.....	4
ITEM 6 - Performance-Based Fees & Side by Side Management.....	5
ITEM 7 - Types of Clients.....	5
ITEM 8 - Methods of Analysis, Investment Strategies & Risk of Loss.....	5
ITEM 9 - Disciplinary Information.....	8
ITEM 10 - Other Financial Industry Activities & Affiliations.....	8
ITEM 11 - Code of Ethics, Participation or Interest in Client Transactions, & Personal Trading.....	8
ITEM 12 - Brokerage Practices.....	9
ITEM 13 - Review of Accounts.....	9
ITEM 14 - Client Referrals & Other Compensation .....	9
ITEM 15 - Custody.....	9
ITEM 16 - Investment Discretion .....	9
ITEM 17 - Voting Client Securities.....	9
ITEM 18 - Financial Information.....	9
ITEM 19 - Requirements for State-Registered Advisers.....	9
ITEM 20 - Form ADV Part 2B – Brochure Supplements.....	11

#### ITEM 4 - ADVISORY BUSINESS

Alphawave Fintech, also referred to herein as the "Advisor," "Firm," "our," or "we," is a State Registered Investment Advisory Firm founded on July 18<sup>th</sup> 2024. The Firm is a registered trademark DBA of Alphawave Investments, LLC. and it is owned in its entirety by Sebastián Garcés, a Texas resident. We specialize in investment portfolio management and provide financial planning and consulting. Our services are tailored to client needs, circumstances, and risk tolerance. Clients can impose restrictions on investments to be included in their accounts and restrict the use of leverage and margin loans. We do not participate in wrap fee programs.

As it pertains to investment portfolio management, our main goal is to obtain above-average returns by investing 100% of a client's assets into publicly traded equities, equity-based funds, fixed income funds, and cryptocurrency funds (collectively referred to herein as "Selected Securities") and holding them long-term. Our Firm's investment style is considered high risk as Selected Securities may fluctuate widely in value.

Our financial planning and consulting services consist of communications regarding client-centric goals and progress, investment recommendations, company-specific information, general economic information, monthly contribution amount recommendations, strategic use of debt, and debt repayment. We may recommend buying, selling, & trading stocks, bonds, mutual funds, index funds, equity-based funds, fixed income funds, money market funds, exchange-traded funds, publicly traded cryptocurrency funds, sale and repurchase agreements, and other securities and/or contracts relating to the same, and may recommend making investments in short-term money-market instruments when we deem appropriate. It is up to the Client to implement these recommendations. The services may be rendered in person or virtually using voice, video, or email and may include referrals to other professionals.

As of January 1<sup>st</sup>, 2025, our Firm held a total of \$741,655 in discretionary managed accounts and \$0 in non-discretionary accounts. Discretionary authority gives us the ability to trade on a client's behalf with that authorization only obtained when a client executes their Investment Advisory Agreement (IAA). No subsequent trades require a client's prior approval.

#### ITEM 5 - FEES & COMPENSATION

We charge an annualized fee on net Assets Under Management (AUM) for portfolio management and hourly fees for financial planning and consulting. Financial planning and consulting services are included free of charge with portfolio management services and may be obtained and billed separately through a separate agreement. Our Firm may also receive compensation for referring clients to legal, accounting, real estate, and tax professionals. All fees are negotiable. We may base negotiations on factors such as account size, complexity, and specific client needs. We do not have pre-payment arrangements of fees with clients for account management.

Our annualized fee of 1.5% (one point five percent) is assessed on net AUM and paid in arrears daily. Clients authorize the custodian to calculate and deduct fees directly from client assets. We obtain client authorization for direct deduction of fees through Investment Advisory Agreements (IAAs) executed between clients and the Firm. To calculate fees to be deducted, the Custodian multiplies the net account liquidation value at the end of each day by the effective rate. The Custodian calculates the effective rate by dividing the annualized fee percentage by 252 (two hundred and fifty-two) business days per year. To account for varying durations for initial and final pay periods, and withdrawals and contributions, Fees are applied on a pro-rata basis commencing on the day clients assign assets to us for management. Pro-rata fees are calculated by applying the effective rate to the daily net liquidation value for the number of days in the period. Our fees and billing practices are delineated in Clause 3 of our Investment Advisory Agreement.

Financial planning and consulting fees are set at \$300 per hour for clients that do not have, or wish to have, their portfolios managed by our Firm. The Client's obligation to pay the Firm is conditioned on the Firm's timely submission of hours worked through a detailed invoice. Fees are paid in arrears for services rendered. Clients will be invoiced through an online payment platform selected by us, or directly via mail or email. Financial planning and consulting clients must execute a Financial Planning & Consulting Services agreement and complete a suitability form prior to obtaining service. All recommendations must be issued, documented, recorded, and stored via email, and email back-ups.

In addition to our fees, clients may incur additional direct or indirect account fees and expenses such as commissions, interest, custodial fees, taxes, fund management fees and expenses, brokerage fees, and other general expenses. The Firm and its personnel do not receive any economic benefit from these additional fees and expenses incurred by clients.

**Payment Method:** Through executed Investment Advisory Agreements, clients authorize us to instruct the custodian to deduct the annualized portfolio management fee directly from client assets. Clients may pay for financial planning and consulting services via credit card, debit card, check, ACH, wire, or bill-pay.

**Negotiability of Fees:** All fees are negotiable. As a result, you may be billed more, or less, for the same service as other clients. Our fees may be higher, or lower, than those charged by other advisors offering similar services.

**Billing on Cash Positions:** The Firm treats cash and cash equivalents as managed assets. Accordingly, and unless otherwise agreed to in writing, all cash and cash equivalents are considered part of a client's assets for the purpose of calculating the client's fees. At any time, the Firm may maintain cash and/or cash equivalents in anticipation of economic headwinds, market events, or adverse financial conditions. Even so, there is no guarantee that such scenarios will materialize. Clients should note that cash and cash equivalents could miss market advances, and that depending on current yields, our management fee could exceed interest generated by cash or cash equivalent positions.

**Periods of Portfolio Inactivity:** The Firm has a fiduciary duty to provide services consistent with the client's best interest. As part of its advisory services, the Firm will review client portfolios on an ongoing basis to determine if any changes are necessary. Actions and recommendations may be based on a variety of factors including returns and performance, changes in a client's objectives and circumstances, client contributions and withdrawals, and fund manager tenure and style drift. There may be extended periods of time when we decide changes to a client's portfolio are not necessary or prudent. Notwithstanding, our management fee will continue to apply during these periods unless otherwise agreed to in writing. There can be no assurance that

decisions made by the Firm will equal any specific level of performance or be profitable.

## **ITEM 6 - PERFORMANCE BASED COMPENSATION**

Our Firm does not charge performance-based fees.

## **ITEM 7 - TYPES OF CLIENTS**

We provide our advisory services to individuals, families, and companies. No investment minimums are required to open a managed account.

## **ITEM 8 - METHODS OF ANALYSIS, INVESTMENT STRATEGIES, & RISK OF LOSS**

**Methods of Analysis:** We select investments we believe will yield favorable client returns using our proprietary methodology. Our methodology involves gathering and evaluating fundamental financial data and qualitative characteristics of Selected Securities to estimate their intrinsic value, returns, and interest yields. Valuations are used in conjunction with macroeconomic data about sectors and regions to select investment options for clients. Individual valuations may be aggregated into weighted, in-house indices and used to assess if particular securities are trading at prices we deem suitable and advantageous for clients. We continually compare our valuations against market prices, aiming to invest client assets in securities we believe are undervalued.

**Investment Strategy:** Our primary goal is to deliver above-average long-term returns through an equity-focused strategy. Accordingly, we mainly invest client funds across numerous companies, sectors, and equity-based funds. Because we seek to invest in equity-based securities at times, and prices, we consider advantageous, we may take several years to fully deploy capital in client accounts. Trading in client accounts is infrequent. Investment time horizons are usually over 5 years and ideally span into decades.

While searching for suitable investment opportunities for clients, we may invest client funds in fixed income securities with short term maturities such as money market accounts, corporate and municipal bonds, treasuries, bank certificates of deposit, and security repurchase agreements. We may also purchase options selectively for hedging purposes when we consider it prudent to do so. We may also invest small portions of client assets into publicly traded cryptocurrency funds for exposure and diversification purposes. Once fully invested, client portfolios typically hold equities, equity-based funds, fixed

income funds, and cryptocurrency funds issued by 100 or more companies and/or institutions.

**Risk of Loss:** Investing in securities involves a risk of loss clients should be prepared to bear. Our equity-focused strategy is considered high-risk as equities and equity-based funds may fluctuate widely in value. Clients could also miss other types of asset classes and investments which could prove more profitable, and/or stable, during any given period. While we work diligently to achieve our goals, we make no guarantee that we will obtain the desired results.

**Concentrated Position Risk:** At times, we may recommend that clients concentrate and/or hold concentrated positions in specific securities, asset classes, or sectors. Such recommendations may be due to our valuation methodology and/or the appreciation of specific positions within a portfolio. Concentrated positions may be relatively few and represent a relatively large percentage of a client's managed assets. As a result, the account may be subject to greater volatility than a more diversified portfolio. Adverse economic and political conditions specific to issuers, sectors, or regions may impact the value of such a portfolio more substantially than if the portfolio's positions were not so concentrated. In addition, changes in the value of a single position within a portfolio will affect the overall value of the portfolio and may cause greater losses than it would in a more diversified portfolio.

**Preferred Securities Risk:** Preferred Securities have similar characteristics to bonds in that they are senior to common stock and are designed to make fixed payments based on a percentage of their par value. As with bonds, the market value of Preferred Securities is sensitive to changes in issuer credit quality, as well as changes in interest rates. Preferred Securities in the form of preferred stock differ from bonds in that they are junior to bonds with regard to the distribution of corporate earnings and liquidation in the event of bankruptcy. Dividends associated with 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. In addition, bondholders generally have protections preferred stockholders do not have. Subject to the credit quality of the issuer, protections may include indentures designed to guarantee payments with terms and conditions for the benefit

of bondholders. 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. In addition, 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, seeking to achieve a return that is a multiple of the opposite performance of the underlying index or benchmark (e.g. -300%). In addition to leverage, these funds may use derivative instruments to accomplish their objectives. As such, inverse funds are highly volatile and provide the potential for significant loss.

**Cybersecurity Risks:** Our Firm, the entities in which we invest, and our service providers are subject to breach and cybersecurity risk. Cybersecurity is a generic term used to describe implementation and adoption of tools, practices, and services designed to protect computer networks, systems, programs, and data from attacks and hacking by external users, and avoid misappropriation of confidential information, damage and disruption to hardware and software systems, and loss or corruption of data.

Cyberattacks may cause investor losses by impeding or sabotaging trading, interfering with the processing of transactions, affecting our ability to calculate net asset value, and through the unauthorized use of our proprietary information. Targeted attacks can result in adverse consequences for issuers of securities in which we invest and may cause investments in such securities to lose value. Investors may incur costs associated with upgraded security measures and forensic analysis to determine the origin and scope of a breach and may be exposed to the dissemination and unauthorized use of confidential and personal information, identity theft, and litigation.

Although we strive to enact robust cybersecurity systems, carefully select service providers, continually review prevention and mitigation procedures, and establish and review business continuity plans, all plans and systems are subject to inherent limitations including the possibility of unidentified risks. Any



such breach could expose our Firm to civil liability and regulatory inquiry and/or action. Cyberattacks are generally deliberate, however unintentional events may have similar effects.

**Pandemic Risk:** Large-scale outbreaks of infectious disease can cause significant economic, social, and political disruption, cross international boundaries, and greatly increase morbidity and mortality over a wide geographic area. 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. Reductions in workforce participation, governmental responses and policies, travel restrictions, and other macroeconomic factors may negatively impact investment returns.

**Recommendation of Other Advisors:** Alphawave Fintech does not refer clients to other Registered Investment Advisors. However, where appropriate and in conjunction with our financial consulting services, we may advise you to use legal, accounting, real estate, and tax professionals. We do not control third parties. There is a risk that third-party recommendations may become less suitable for clients over time, or that professionals may deviate from their mandates or strategies. Deviations may result in losses, or other financial consequences for clients. If significant deviations occur from stated recommendations, mandates, or strategies, we may recommend changing or replacing third-party professionals. Aiming to mitigate this risk, we will evaluate third-parties' management, credentials, and success over time prior to issuing a recommendation.

Past performance of a third-party professional is not a guarantee of future results. They may be adversely affected by market conditions and economic risks and may not be able to replicate past performance, even if they have demonstrated a certain level of success previously. Additional details and associated risks regarding our use of third parties can be found in our IAA, Form ADV Part 2A Brochure, and disclosure documents.

**Cryptocurrency Risk:** Our Firm may invest small portions of a client's assets into publicly traded cryptocurrency funds for exposure and diversification purposes. We rely on cryptocurrency fund managers to determine the quality of digital assets to be

included in their funds. Due in part to the numerous risks associated with investing in cryptocurrencies, we do not invest in digital tokens directly, and typically only allocate 1-3% of client assets in cryptocurrency funds. Your allocation percentage may ultimately be a higher or lower percentage of your total assets due to fluctuations in prices over time, and we may rebalance overweight positions into other asset classes at our discretion.

In our view, some exposure to cryptocurrencies is suitable for most clients if allocations represent a small fraction of total assets. Factors such as income, account size, and risk tolerance may be used to determine your specific allocation percentage.

Cryptocurrencies (e.g., Bitcoin, Ether, Tether, and others), often referred to as "digital assets," "tokens," or "virtual/digital currencies, are an emerging asset class designed to act as a medium of exchange using tokens and blockchain technology. Thousands of tokens exist, the most well-known being Bitcoin (฿). Regulation for this asset class is still developing in the United States. Tokens are generally not backed by any government, are not considered legal tender, and function without central authority or banks. At any time, federal or state government entities, both domestically and internationally, may restrict the use and exchange of cryptocurrencies. In addition, the SEC has issued a public report stating that U.S. federal securities laws require treating some digital assets as securities. Like fiat currencies (e.g., Currencies backed by central banks or national, supra-national, or quasi-national organizations), cryptocurrencies are susceptible to theft, loss, and destruction. Many significant aspects of the U.S. federal income tax treatment of investments in cryptocurrencies are uncertain and an investment in cryptocurrencies 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.

Cryptocurrency exchanges and other trading venues are relatively new and are largely unregulated. These exchanges may be more exposed to fraud and failure

than established, regulated exchanges for securities, derivatives, and other currencies. In addition, these exchanges may stop operating or permanently shut down due to technical glitches, hackers, or malware. In addition, digital assets are highly dependent on their developers. There is no guarantee development will continue or that developers will not abandon a cryptocurrency project with little or no notice. Third parties may also assert intellectual property claims relating to the holding and transfer of digital assets, cryptocurrencies, and their source code. Threatened action that reduces confidence in a network's long-term ability to hold and transfer cryptocurrency may affect exchanges and cryptocurrency investments.

Cryptocurrency transactions may be irreversible. It is possible that an improper transaction may only be undone or reversed unilaterally by the receiver agreeing to return the cryptocurrency to the sender. In addition, most cryptocurrencies have a limited trading history and have experienced extreme volatility and price fluctuations making it difficult for investors to assess the quality and viability of investments. Furthermore, cryptocurrencies may continue to be affected by high volatility and clients with exposure to digital assets through securities and investment vehicles like ETFs may experience losses related to high volatility. Digital assets may also trade at a significant premium or discount to NAV.

#### **ITEM 9 – DISCIPLINARY INFORMATION**

There are currently no legal or disciplinary events to report for our Firm or its CEO, Sebastián Garcés.

#### **ITEM 10 – OTHER FINANCIAL INDUSTRY ACTIVITIES & AFFILIATIONS**

Alphawave Fintech is a registered trademark DBA of Alphawave Investments, LLC. and is owned entirely by Sebastián Garcés, an individual residing in the State of Texas. Mr. Garcés is currently employed in a clerical role as a Transition Assistant at 57 West Capital Advisors, Inc. His duties require less than one hour per week, are associated with miscellaneous tasks related to his departure from the firm, and do not pose any material conflict of interest, in our view.

Mr. Garcés is also an active minority shareholder at 57 West Capital Holdings, Inc., a firm which owns a Registered Investment Advisory firm. While we regard his stake in that business as complementary to his role at our Firm, the relationship may present a conflict of interest as it relates to client referrals

made between the firms. Aiming to resolve any conflict of interest, we disclose this fact to current and prospective clients, and require our clients to disclose if they have an existing account with 57 West Capital Advisors Inc. Prospective clients of our Firm are precluded from opening accounts at our firm if they are also clients of 57 West Capital Advisors, Inc.

#### **ITEM 11 – CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS, & PERSONAL TRADING**

Our Firm requires all personnel to comply with all applicable laws of the United States, securities laws, and internal policies. We have adopted and regularly review Supervisory Procedures and have designated a Chief Compliance Officer (CCO) responsible for verifying adherence to these laws and policies. A copy of our Code of Ethics is available upon request.

Our Firm and its personnel are prohibited from acting as principal in trades with clients and we keep a record of all trades. Neither the Firm nor its personnel may purchase or sell securities directly to clients from their own portfolios. Our policy in any purchase or sale of securities is that client orders are executed ahead of any orders for our Firm or personnel. We may acquire the same securities we recommend to clients or acquire securities we do not recommend to clients. Personnel are required to disclose all trades in personal accounts ahead of execution. The CCO verifies the Firm's adherence to laws and Supervisory Procedures quarterly.

#### **ITEM 12 – BROKERAGE PRACTICES**

Where clients do not designate a broker-dealer, we may suggest Interactive Brokers, LLC. (IB) or another broker-dealer we reasonably believe will provide the best execution. Please note this is considered to be Directed Brokerage and that not all advisers require or recommend the use of a specific broker to their clients. Directed Brokerage may result in clients not being able to achieve the most favorable transaction executions, which may result in higher costs than those available at other brokerage firms. We do not obtain economic benefits from selecting a broker-dealer. We are not affiliated with, nor have, another economic relationship with IB that creates a conflict of interest. Our preference for IB is based on commission rates, margin rates, ease of use, trade execution, and technological features. IB may also save clients work and time by providing consolidated account views, reports, and functions.



When appropriate, trades on accounts using IB will be aggregated and done in the name of our Firm. Only accounts in the custody of IB will have the opportunity to participate in aggregated securities transactions, or block trades. We will inform the executing broker that the trades are for client accounts and not for the firm itself. No client account within a block trade will be favored over another account. Each account will participate in a block trade at the average share price and receive the same commission rate. IB will be notified of the amount for each trade on each account. Block trades may reduce or increase the costs of execution.

Clients may instruct us to use a broker-dealer of their choice. Thus, clients are responsible for negotiating rates and other expenses with their broker and they may not be able to obtain the most competitive rates. They may pay more than the rates available at our preferred broker-dealer. Other than for the execution of trades, we do not use information, research, or any other service provided by your selected broker to make investment, trading, or advisory decisions.

#### **ITEM 13 – REVIEW OF ACCOUNTS**

Client accounts are reviewed annually. Portfolios may also be reviewed, other than periodically, when the Advisor considers it beneficial to do so in response to new developments, market conditions, or changes in an investment's valuation or business. Clients receive quarterly performance reports digitally. Performance is benchmarked against the S&P 500 Index.

#### **ITEM 14 – CLIENT REFERRALS & OTHER COMPENSATION**

Alphawave Fintech does not refer clients to, provide compensation, or receive compensation from other Registered Investment Advisors. However, we may receive compensation for referring you to legal, accounting, real estate, and tax professionals. We refuse referrals and disallow compensation to, and from, individuals from blacklisted countries as per the Financial Action Task Force (FATF).

#### **ITEM 15 - CUSTODY**

We are deemed to have constructive custody of client funds and securities since clients grant us authority to deduct fees from their accounts in the IAA. In accordance with regulatory requirements, we maintain policies and safeguards regarding custody of client assets.

#### **ITEM 16 – INVESTMENT DISCRETION**

We only accept client accounts where an executed limited power of attorney grants us discretionary authority. This authorization is also described, and agreed upon, in the IAA signed by the Advisor and each client. Further, a client may limit our ability to invest in particular asset classes, vehicles, and/or securities. Customarily, few restrictions have been placed on the Advisor.

#### **ITEM 17 – VOTING CLIENT SECURITIES**

The Advisor and its personnel do not vote proxies on behalf of clients. Clients retain the responsibility and right to vote on proxies for all securities held in their accounts. Clients may receive proxies directly from their custodians, transfer agents, or from publicly traded companies via direct mail or other forms of electronic communication. Our proxy voting policies are available upon request. We may provide advice on voting proxies via telephone or in writing via email by client request.

#### **ITEM 18 – FINANCIAL INFORMATION**

We do not solicit pre-payments or upfront fees of any kind. The Firm and Sebastián Garcés, have no financial commitments which impair their ability to meet agreed upon obligations with our Clients.

#### **ITEM 19 – REQUIREMENTS FOR STATE REGISTERED ADVISERS**

Sebastián Garcés is the CEO of Alphawave Fintech and has been in the investment industry for over a decade. Prior to establishing this firm, he served as Chief Compliance Officer and Investment Advisor Representative at 57 West Capital Advisors, Inc.

The Firm operates only in the investment advisory and investment management business in the United States. Sebastián Garcés is the only state registered advisor for Alphawave Fintech and manages the firm full-time. He dedicates 90% of his professional time to various capacities at the firm with the remainder spent on personal business matters not related to the activities of the firm.



# ALPHAWAVE FINTECH

M E E T I N G   Y O U   W H E R E   Y O U   A R E

## Form ADV Part 2B Brochure Supplement

**January 1<sup>st</sup>, 2025**

This Brochure Supplement provides information about Sebastián Garcés, that supplements Alphawave Fintech's (hereinafter "Advisor," "Firm," "our," or "we.") Investment Brochure. You should have received a copy of that Brochure. Please contact our CEO at (512) 537-4009 if you did not receive our brochure or if you have any questions about the contents of this Brochure Supplement. Additional information about Sebastián Garcés is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

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## ITEM 2 - EDUCATIONAL BACKGROUND & BUSINESS EXPERIENCE

Full Name: Juan Sebastián Garcés

Year of Birth: 1984

### Educational Background:

- Political Science Degree: Texas State University 2010

### Business Background for the Previous 10 Years:

- Chief Executive Officer – Alphawave Fintech ..... 07/24–Present
- Transition Assistant – 57 West Capital Advisors ..... 08/24–Present
- Chief Compliance Officer – 57WCA ..... 04/22–08/24
- Investment Advisor Representative – 57WCA ..... 12/15–08/24
- Board of Directors – 57 West Capital Holdings ..... 09/16–09/23
- Marketing Director – 57WCA ..... 07/12 - 08/24

## 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 Sebastián Garcés and Alphawave Fintech. Mr. Garcés has no history of legal or disciplinary events.

## ITEM 4 – OTHER BUSINESS ACTIVITIES

Sebastián Garcés manages Alphawave Fintech full-time. He dedicates 90% of his professional time to various capacities at the firm, with the remainder spent on personal business matters not related to the activities of the Firm. Mr. Garcés is also currently employed at 57 West Capital Advisors, Inc. as a Transition Assistant and devotes up to one hour per week to miscellaneous tasks associated with his departure.

In addition, Mr. Garcés is also a minority shareholder at 57 West Capital Holdings, Inc., a firm which owns a Registered Investment Advisory firm. While we regard his stake in that business as complementary to his role at our Firm, the relationship may present a conflict of interest as it relates to client referrals made between the firms. Aiming to resolve any conflict of interest, we disclose this fact to current and prospective clients, and require our clients to disclose if they have an existing account with 57 West Capital Advisors, Inc. Prospective clients of Alphawave Fintech are precluded from opening accounts at our firm if they are also clients of 57 West Capital Advisors, Inc.

## ITEM 5 – ADDITIONAL COMPENSATION

Sebastián Garcés does not receive any additional compensation or economic benefits from third party sources in connection with his advisory activities.

## ITEM 6 – SUPERVISION

Mr. Garcés is the Chief Compliance Officer (CCO) and an Investment Advisor Representative (IAR) at Alphawave Fintech. We have drafted and implemented Supervisory Procedures and a Code of Ethics intended to guide the CCO and all IARs in meeting their fiduciary obligations to clients. Clients may contact the CCO using the contact information listed on the cover of this Brochure Supplement to obtain a copy of our Code of Ethics.

As CCO, Mr. Garcés is responsible for creating and implementing the Firm's compliance program and staying abreast of industry compliance topics, practices, and regulations. He is committed to adhering to all pertinent regulations promulgated by the Texas State Securities Board and ensuring all employees adhere to all policies and guidelines outlined in our Supervisory Procedures and Code of Ethics.

As an IAR, Mr. Garcés is responsible for issuing recommendations and investing client funds according to client objectives, reviewing client portfolios, monitoring investments, and following pertinent policies in our Supervisory Procedures.

Additionally, the firm is subject to regulatory oversight by various agencies. These agencies require registration by the Firm and its Advisors. We are subject to announced and unannounced examinations by regulators. The firm is required to periodically update the information provided to these agencies and to provide various reports regarding the Firm's business and AUM.

## ITEM 7 – REQUIREMENTS FOR STATE REGISTERED ADVISERS

### Disciplinary Information

Sebastián Garcés has not been involved in any reportable disciplinary events.

### Bankruptcy Petition

Sebastián Garcés has not been subject to a bankruptcy petition.