



Paraiba Wealth Management LLC

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Form ADV Part 2A: Firm Brochure

March 30, 2026

This disclosure brochure provides information about the qualifications and business practices of Paraiba Wealth Management LLC (also referred to as we, us and Paraiba Wealth Management throughout this disclosure brochure). If you have any questions about the contents of this disclosure brochure, please contact us at 415-465-0243 or contact@paraibawealth.com.

Additional information about Paraiba Wealth Management is also available on the Internet at www.adviserinfo.sec.gov. You can view our firm's information on this website by searching for Paraiba Wealth Management LLC or our firm's CRD number 322336.

*Registration as an investment adviser does not imply a certain level of skill or training.

Item 2 – Material Changes

Form ADV Part 2 requires registered investment advisers to amend their brochure when information becomes materially inaccurate. If there are any material changes to an adviser's disclosure brochure, the adviser is required to notify you and provide you with a description of the material changes.

Since our last disclosure dated April 15, 2025, we have made the following material changes to this Form ADV Part 2A:

We amended Item 5 - Fees and Compensation, to amend our standard fee schedule.

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Paraiba Wealth Management is an investment adviser registered with the State of California and is a limited liability company (LLC) formed under the laws of the State of California in the United States.

Alvin Yam is the Founder and serves as the firm’s Lead Portfolio Manager and Chief Compliance Officer (CCO). He controls 95% of Paraiba Wealth Management. Full details of his education and business background are provided at Item 19 of this Brochure.

Allan Yam is the firm’s Head of Research. He controls 5% of Paraiba Wealth Management. Full details of his education and business background are provided at Item 19 of this Brochure.

Paraiba Wealth Management filed its initial application to become registered as an investment adviser in July, 2022.

Introduction

The investment advisory services of Paraiba Wealth Management are provided to you through an appropriately licensed individual who is an investment adviser representative of Paraiba Wealth Management (or also referred to as “we”, “our” or “firm” throughout this brochure).

For all investment advisory services provided by Paraiba Wealth Management, you should be

aware that a conflict of interest exists between our interests and your interests. You are under no obligation to act on our recommendations and, if you do, are under no obligation to affect any transaction through us.

Per the requirements of CCR Section 260.238(k), we have fully disclosed all material conflicts of interest regarding Paraiba Wealth Management, our investment adviser representatives and our employees that could reasonably be expected to impair the rendering of unbiased and objective advice.

Item 4 – Description of Advisory Services

The following are descriptions of the primary advisory services of Paraiba Wealth Management. Please understand that a written agreement, which details the exact terms of the service, must be signed by you and Paraiba Wealth Management before we can provide you the services described below.

Asset Management Services – Paraiba Wealth Management offers asset management services, which involves Paraiba Wealth Management providing you with continuous and ongoing supervision over your specified accounts.

You must appoint our firm as your investment adviser of record on specified accounts (collectively, the “Account”). The Account is held by a qualified custodian(s) under your name. The qualified custodian maintains physical custody of all funds and securities of the Account, and you retain all rights of ownership (e.g., right to withdraw securities or cash, exercise or delegate proxy voting and receive transaction confirmations) of the Account.

The Account is managed by us based on your financial situation, investment objectives and risk tolerance. We actively monitor the Account and provide advice regarding buying, selling, reinvesting or holding securities, cash or other investments of the Account.

We will need to obtain certain information from you to determine your financial situation and investment objectives. We make investment decisions for you based on information you provide to us. Therefore, our investment selections may not be suitable if you do not provide us with accurate and complete information. You will be responsible for notifying us of any updates regarding your financial situation, risk tolerance or investment objective and whether you wish to impose or modify existing investment restrictions; however, we will contact you at least annually to discuss any changes or updates regarding your financial situation, risk tolerance or investment objectives. We are always reasonably available to consult with you relative to the status of your Account.

You have the ability to impose reasonable restrictions on the management of your accounts, including the ability to instruct us not to purchase certain securities. You can also request other restrictions on the Account, such as when you need to keep a minimum level of cash in the

Account or you do not want us to buy or sell certain specific securities or security types in your Account. We reserve the right to not accept and/or terminate management of your Account if we feel that your imposed restrictions would limit or prevent us from meeting or maintaining your investment strategy.

It is important that you understand that we manage investments for other clients and may give them advice or take actions for them or for our personal accounts that are different from the advice we provide to you, or actions taken for you. We are not obligated to buy, sell or recommend to you any security or other investment that we may buy, sell or recommend for any other clients or for our own accounts.

Conflicts may arise in the allocation of investment opportunities among accounts that we manage. We strive to allocate investment opportunities believed to be appropriate for your account(s) and other accounts advised by our firm among such accounts equitably and consistent with the best interests of all accounts involved. However, there can be no assurance that a particular investment opportunity that comes to our attention will be allocated in any particular manner. If we obtain material, non-public information about a security or its issuer that we may not lawfully use or disclose, we have absolutely no obligation to disclose the information to any client or use it for any client's benefit.

We will only be responsible for the supervision and management of securities we recommend. We will not be responsible for the supervision or management of non-managed assets. Non-managed assets can include securities held in your account that is under our management that were:

- Delivered into the account by you;
- Purchased by you;
- Purchased by Paraiba Wealth Management at your request as an accommodation; or
- Designated by you to be non-managed securities by written notification.

We do not assess our investment advisory management fee on non-managed assets.

Financial Planning Services

Paraiba Wealth Management offers financial planning services, which involve preparing a written financial plan covering specific or multiple topics. When providing financial planning services, the role of your investment adviser representative is to find ways to help you understand your overall financial situation and help you set financial objectives.

Financial planning services typically involve providing a variety of advisory services to clients regarding the management of their financial resources based upon an analysis of their individual needs. These services can range from broad-based financial planning to consultative or single subject planning.

If you retain our firm for financial planning services, we will gather information about your financial circumstances and objectives. We can also use financial planning software to determine your current financial position and to define and quantify your long-term goals and objectives. Once we review and analyze the information provided to our firm and the data derived, we will deliver a plan, designed to help you achieve your stated financial goals and objectives. With respect to clients who have engaged our firm's Asset Management Services, we can provide consultative or modular financial planning on specific topics selected by the client.

Our broad-based financial plans typically address the following topics:

- Asset Allocation
- Budgeting
- Cash Flow Analysis & Budgeting
- College/Education Planning
- Investment Analysis
- Investment Planning
- Retirement Planning
- Tax Planning
- Employer equity compensation
- Risk Management
- Cross-Border Planning Issues

We also provide modular and single-project financial plans which only cover those specific areas of concern mutually agreed upon by you and us. A modular or single-project financial plan is limited or segmented and does not involve the creation of a full written financial plan. You should be aware that there are important issues that may not be taken into consideration when your investment adviser representative develops his or her analysis and recommendations under a modular written financial plan.

Our financial planning services do not involve implementing any transaction on your behalf or the active and ongoing monitoring or management of your investments or accounts. You have the sole responsibility for determining whether to implement our financial planning recommendations. To the extent that you would like to implement any of our investment recommendations through Paraiba Wealth Management or retain Paraiba Wealth Management to actively monitor and manage your investments, you must execute a separate written agreement with Paraiba Wealth Management for our Asset Management Services.

Retirement Plan Rollover Recommendations

When Paraiba Wealth Management provides investment advice about your retirement plan account or individual retirement account ("IRA") including whether to maintain investments

and/or proceeds in the retirement plan account, roll over such investment/proceeds from the retirement plan account to an IRA or make a distribution from the retirement plan account, we acknowledge that Paraiba Wealth Management is a “fiduciary” within the meaning of Title I of the Employee Retirement Income Security Act (“ERISA”) and/or the Internal Revenue Code (“IRC”) as applicable, which are laws governing retirement accounts. The way Paraiba Wealth Management makes money creates conflicts with your interests, so Paraiba Wealth Management operates under a special rule that requires Paraiba Wealth Management to act in your best interest and not put our interest ahead of you.

Under this special rule’s provisions, Paraiba Wealth Management must act as a fiduciary to a retirement plan account or IRA under ERISA/IRC:

- Meet a professional standard of care when making investment recommendations (give prudent advice).
- Never put the financial interests of Paraiba Wealth Management ahead of you when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that Paraiba Wealth Management gives advice that is in your best interest;
- Charge no more than is reasonable for the services of Paraiba Wealth Management; and
- Give clients basic information about conflicts of interest.

To the extent we recommend you roll over your account from a current retirement plan account to an individual retirement account managed by Paraiba Wealth Management, please know that Paraiba Wealth Management and our investment adviser representatives have a conflict of interest.

We can earn increased investment advisory fees by recommending that you roll over your account at the retirement plan to an IRA managed by Paraiba Wealth Management. We will earn fewer investment advisory fees if you do not roll over the funds in the retirement plan to an IRA managed by Paraiba Wealth Management.

Thus, our investment adviser representatives have an economic incentive to recommend a rollover of funds from a retirement plan to an IRA which is a conflict of interest because our recommendation that you open an IRA account to be managed by our firm can be based on our economic incentive and not based exclusively on whether or not moving the IRA to our management program is in your overall best interest.

We have taken steps to manage this conflict of interest. We have adopted an impartial conduct standard whereby our investment adviser representatives will (i) provide investment advice to a retirement plan participant regarding a rollover of funds from the retirement plan in accordance with the fiduciary status described below, (ii) not recommend investments which result in Paraiba Wealth Management receiving unreasonable compensation related to the rollover of

funds from the retirement plan to an IRA, and (iii) fully disclose compensation received by Paraiba Wealth Management and our supervised persons and any material conflicts of interest related to recommending the rollover of funds from the retirement plan to an IRA and refrain from making any materially misleading statements regarding such rollover.

When providing advice to a retirement plan account or IRA, our investment advisor representatives will act with the care, skill, prudence, and diligence under the circumstances then prevailing that a prudent person acting in a like capacity and familiar with such matters would use in the conduct of an enterprise of a like character and with like aims, based on the investment objectives, risk, tolerance, financial circumstances, and a client's needs, without regard to the financial or other interests of Paraiba Wealth Management or our affiliated personnel.

Limits Advice to Certain Types of Investments

Paraiba Wealth Management provides investment advice on the following types of investments:

- Equities (e.g., individual stock positions)
- Fixed income positions (e.g., bonds)
- Mutual Funds
- Exchange Traded Funds (ETFs)
- Exchange-listed Securities
- Foreign Issues
- Corporate Debt Securities
- Municipal Securities
- US Government Securities
- Options Contracts on Securities
- Interests in Partnerships Investing in Real Estate
- Hedge Funds

Although we generally provide advice only on the products previously listed, our firm will occasionally utilize additional types of investments, other than those listed above, if they are appropriate to address the individual needs, goals and objectives of the client or in response to client inquiry. Paraiba Wealth Management may offer investment advice on any investment held by the client at the start of the advisory relationship and we reserve the right to offer advice on any investment product that may be suitable for each client's specific circumstances, needs, goals and objectives.

It is not our typical investment strategy to attempt to time the market, but we may increase cash holdings modestly as deemed appropriate based on your risk tolerance and our expectations of market behavior. We may modify our investment strategy to accommodate special situations such as low basis stock, stock options, legacy holdings, inheritances, closely held businesses, collectibles, or special tax situations.

Please refer to Item 8 – Methods of Analysis for more information.

Tailor Advisory Services to Individual Needs of Clients

Paraiba Wealth Management's advisory services, including our financial planning services, are always provided based on your individual needs. This means, for example, that when we provide asset management services, you are given the ability to impose restrictions on the accounts we manage for you, including specific investment selections and sectors. We work with you on a one-on-one basis through interviews and questionnaires to determine your investment objectives and suitability information.

We will not enter into an investment adviser relationship with a prospective client whose investment objectives may be considered incompatible with our investment philosophy or strategies or where the prospective client seeks to impose unduly restrictive investment guidelines.

When managing client accounts through our firm's Asset Management Services program, we will typically manage a client's account in accordance with one or more model portfolios that are customized for clients through allocations changes. When client accounts are managed using model portfolios, investment selections are based on the underlying model, which can be customized (or individualized). However, the determination to use a particular model or models is always based on each client's individual investment goals, objectives and mandates.

Client Assets Managed by Paraiba Wealth Management

Paraiba Wealth Management has approximately \$20 million in assets under management to report as of the date of this Brochure.

Item 5 – Fees and Compensation

In addition to the information provided in Item 4 – Advisory Business, this section provides additional details regarding our firm's services along with descriptions of each service's fees and compensation arrangements.

Paraiba Wealth Management believes that its annual fee is reasonable in relation to: (1) services provided and (2) the fees charged by other investment advisers offering similar services/programs. However, our annual investment advisory fees may be higher than those charged by other investment advisers offering similar services/programs.

The exact fees and other terms will be outlined in the agreement between you and Paraiba Wealth Management.

Asset Management Services

Paraiba Wealth provides asset management services for an annual fee based on a percentage of the market value of your assets under management (AUM). Fees are billed quarterly in advance and are calculated using the fair market value of your account on the last business day of the previous calendar quarter.

Our annual fee is "tiered." This means that the first \$1,000,000 of your assets is charged at the 1.50% rate, the next \$1,000,000 is charged at 1.25%, and so on. As your assets grow and cross these thresholds, you benefit from the lower rates on the incremental amounts.

Prorated Fees for Mid-Quarter Inception

If an account is opened after the start of a billing quarter, the initial fee is prorated based on the number of days remaining in that period. This prorated fee is calculated using the account's initial value when services commence and is deducted immediately at that time.

Tiered Fee Schedule

Our standard annual advisory fee is calculated using the following tiered schedule:

- **First \$1,000,000:** 1.50%
- **Next \$4,000,000:** 1.25%
- **Amounts over \$5,000,000:** 1.00%

Minimum Annual Fee

To ensure that we can provide the high level of active management and research required by our strategy, Paraiba Wealth has a minimum annual fee of \$7,500 per household. This minimum fee may result in an effective fee rate that is higher than the percentages listed above for clients with smaller accounts.

Paraiba Wealth retains the discretion to negotiate, waive, or reduce the minimum fee or the fee schedule on a client-by-client basis.

Asset Management Services continue in effect until terminated. You may terminate the services by providing Paraiba Wealth Management with written notice. Paraiba Wealth Management may terminate the services by providing you with written notice effective 30 days after you receive the written notice. Any prepaid, unearned fees will be promptly refunded by Paraiba Wealth Management to you. Fee refunds will be determined on a pro rata basis using the number of days services are actually provided during the final period.

Fees charged may be negotiable based on the type of client, the complexity of the client's situation, the potential for additional account deposits, and the total amount of assets under management for the client. Fees for certain accounts may be under different fee schedules based on the type of specific investment strategy used for those accounts.

The investment advisory fees will be deducted from your account and paid directly to our firm by the qualified custodian(s) of your account. You must authorize the qualified custodian(s) of your account to deduct fees from your account and pay such fees directly to Paraiba Wealth Management.

Our firm will send you a billing statement at the time that fee deduction instruction is sent to the qualified custodian(s) of your account. The billing statement will detail the formula used to calculate the fee, the assets under management and the time period covered.

You should review your account statements received from the qualified custodian(s) and verify that appropriate investment advisory fees are being deducted. The qualified custodian(s) will not verify the accuracy of the investment advisory fees deducted.

Brokerage expenses and/or transaction fees charged by the qualified custodian are billed directly to you by the qualified custodian. Paraiba Wealth Management does not receive any portion of such commissions or fees from you or the qualified custodian. In addition, you will incur certain charges imposed by third parties other than Paraiba Wealth Management in connection with investments made through your account including, but not limited to, mutual fund sales loads, 12(b)-1 fees and surrender charges, variable annuity fees and surrender charges, IRA and qualified retirement plan fees, and charges imposed by the qualified custodian(s) of your account.

Management fees charged by Paraiba Wealth Management are separate and distinct from the fees and expenses charged by investment company securities that may be recommended to you. A description of these fees and expenses are available in each investment company security's prospectus. We do not receive any portion of such fees and expenses.

Financial Planning Services

If you are an Asset Management Services client, we do not charge additional fees for your financial planning as all financial planning services are included in the annual fee charged to manage your Account(s).

For all other clients, fees charged for our financial planning services are negotiable based upon the type of client, the services requested, the investment adviser representative providing advice, the complexity of the client's situation, other advisory services provided and the relationship of the client and the investment adviser representative.

The following are the fee arrangements available for financial planning services offered by Paraiba Wealth Management.

One-Time Financial Planning Services

Fixed fees for one-time financial planning services range between \$1,000 to \$7,000. The amount of the fixed fee for your engagement is specified in your financial planning agreement with Paraiba Wealth Management.

In addition to fixed fee services, Paraiba Wealth Management offers hourly financial planning services at a rate of \$400 per hour. Hourly services are billed based on the actual time spent and require a minimum billing increment as described in your agreement. An estimate of the total hours and fees will be provided before engagement begins.

It is our policy to require 50% of the fixed fee to be paid in advance at the time you execute an agreement with Paraiba Wealth Management; however, Paraiba Wealth Management does not require payment of more than \$500 in fees and more than six months in advance. For hourly services, fees are due upon completion of the hourly engagement or as otherwise specified in the agreement.

Upon completion and delivery of the financial plan for fixed fee engagements, the fixed fee is considered earned by Paraiba Wealth Management and any unpaid amount is immediately due. One-time financial planning services terminate thirty (30) days following the delivery of the written financial plan or upon either you or Paraiba Wealth Management providing the other party with written notice.

You may terminate the financial planning services within five (5) business days of entering into an agreement with Paraiba Wealth Management without penalty or fees due. If you terminate the financial planning services after five (5) business days of entering into an agreement, you will be responsible for immediate payment of any financial planning services performed by Paraiba Wealth Management prior to the receipt of your termination notice. In the event there is a remaining balance of any fees paid in advance after deducting fees from the final invoice, those remaining proceeds will be refunded to you.

Additional Terms and Conditions

You may pay fees owed for financial planning services by submitting payment directly (for example, by check) or ACH transfer or wire transfer.

You should notify Paraiba Wealth Management within ten (10) days of receipt of an invoice if you have questions about or dispute any billing entry.

All fees paid to Paraiba Wealth Management for financial planning services are separate and distinct from the commissions charged by a broker-dealer or asset management fees charged to implement such recommendations.

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

Performance-based fees are defined as fees based on a share of capital gains on or capital appreciation of the assets held in a client's account. Item 6 is not applicable to this Disclosure Brochure because we do not charge or accept performance-based fees.

Item 7 – Types of Clients

Paraiba Wealth Management generally provides investment advice to natural-person clients, such as High Net Worth individuals and families, including their personal trusts, family trusts and estates. To become a client of Paraiba Wealth Management, you are required to execute a written agreement specifying the particular advisory services to be provided.

Minimum Investment Amounts Required

Paraiba Wealth Management's **typical minimum portfolio size is \$500,000 per household**. While we may, at our discretion, accept accounts below this threshold, clients should generally expect to maintain at least \$500,000 in investable assets under management with our firm. All clients are required to execute an agreement for services in order to establish a client relationship with Paraiba Wealth Management.

Item 8 – Methods of Analysis

Paraiba Wealth Management may use one or more of the following methods of analysis when formulating investment advice:

- **Charting** – Use of price, volume, and other indicator charts to anticipate future price movements based on historical patterns. Risk: chart patterns are subjective and can be negated by subsequent data or broader patterns not yet apparent.
- **Cyclical Analysis** – Evaluation of investments tied to economic business cycles. Risk: the timing of cycle peaks and troughs is uncertain, and mistimed buy or sell decisions may result in losses or missed opportunity.
- **Fundamental Analysis** – Evaluation of a security's intrinsic value using economic, financial, qualitative, and quantitative factors. Risk: analysis is partly subjective; conflicting market forces may be misinterpreted, leading to unfavorable investment decisions.
- **Technical Analysis** – Evaluation of securities using historical price and volume data to identify patterns and market sentiment. Risk: interpretations are subjective; future trading volume is unknown, and sentiment indicators may become more extreme before reversing.

Investment Strategies

Paraiba Wealth Management may employ the following strategies:

- **Long-term purchases** – Securities held for at least one year.
- **Short-term purchases** – Securities sold within one year of purchase.
- **Frequent trading** – Securities sold within 30 days of purchase.
- **Value investing** – Selecting stocks believed to trade below intrinsic value. Risks include incorrect valuation, concentration risk, underperformance relative to benchmarks, macroeconomic risk, value traps, and inflation eroding cash holdings.
- **Options strategies** – Including covered options, uncovered options, and spreading strategies. Options are contracts granting the right to buy or sell a security at a fixed price within a specified period and entail greater than ordinary investment risk.
- **Tactical asset allocation** – Maintaining percentage ranges for each asset class to allow limited market timing within defined parameters.
- **Strategic asset allocation** – Setting target allocations with periodic rebalancing as returns skew the original percentages; targets may shift as client goals and time horizons evolve.

Tax Considerations: Unless otherwise agreed in writing, tax efficiency is not our primary consideration in managing your assets. We strongly recommend consulting a tax professional before and throughout the investment process. Your custodian defaults to FIFO cost basis accounting. If a different accounting method is preferred, notify us in writing before trades settle, as cost basis elections cannot be changed after settlement.

We do not primarily recommend one type of security. We recommend investments suitable to each client's individual circumstances and needs.

Risk of Loss

Past performance is not indicative of future results. Investing in securities involves risk of loss, including loss of principal. Our firm cannot guarantee, represent, or imply that our methods of analysis will predict future results, identify market tops or bottoms, or protect against losses from market corrections.

Material risks associated with our investment management program include:

- **Market Risk** – Broad market declines or deterioration in an individual company's value may reduce the value of client investments (also referred to as systemic risk).
- **Equity Risk** – Common stocks are subject to general market fluctuations and may be more volatile than preferred stocks or debt obligations of the same issuer.
- **Small-Cap Risk** – Smaller company stocks may be harder to sell, less transparent, and more price-volatile than large, established companies.
- **Company/Industry Risk** – Company-specific or industry-specific events (e.g., labor disputes, regulatory actions, adverse publicity) may reduce an investment's value

(unsystematic risk, reducible through diversification).

- **Fixed Income Risk** – Bond issuers may default on payments; inflation may erode the real value of fixed income streams.
- **Options Risk** – Options may experience greater value fluctuations than the underlying securities. Writing uncovered options is a highly specialized activity with above-average risk.
- **ETF and Mutual Fund Risk** – Investors bear their pro-rata share of fund operating expenses, potential duplication of management fees, and brokerage costs. Fund risk generally reflects the risk of the underlying holdings.
- **Inverse and Leveraged ETF Risk** – These funds reset daily and are designed to achieve stated objectives on a daily basis. Due to compounding, performance over periods longer than one trading session can diverge significantly from the underlying index. These products are generally unsuitable for retail investors holding them beyond a single session, particularly in volatile markets. We may use leveraged inverse ETFs as portfolio hedges and may hold them longer than a few days; their effectiveness as a hedge over extended holding periods is uncertain.
- **Management Risk** – Returns depend on the success of our investment strategies, research, and security selection. If strategies do not perform as expected, portfolio values may decline.
- **REIT Risk** – REIT values are affected by changes in underlying property values, interest rates, property taxes, creditworthiness of issuers, tax laws, and regulatory requirements. Both equity and mortgage REITs depend on management skill, cash flows, and maintaining applicable tax treatment.
- **Foreign Investment Risk** – Although foreign exposure is limited to ADRs, mutual funds, and ETFs holding foreign securities, underlying risks still apply, including currency fluctuation, different accounting and disclosure standards, political instability, capital controls, higher transaction costs, and settlement delays. Investments in developing/emerging markets carry heightened versions of these risks due to smaller markets, lower liquidity, less developed legal systems, and greater political and economic uncertainty.
- **ADR Risk** – ADRs trade on U.S. exchanges but represent shares in foreign companies. Risks include limited financial disclosure, lower liquidity, currency fluctuation, and foreign dividend withholding taxes (up to 30%) that may not be recoverable, particularly in tax-exempt accounts.
- **GDR Risk** – Global Depositary Receipts represent ownership interests in foreign companies marketed outside their home countries. While structured to simplify cross-border investing, they remain subject to the foreign investment risks described above.

Item 9 – Disciplinary Information

Item 9 is not applicable to this Disclosure Brochure because there are no legal or disciplinary

events that are material to a client's or prospective client's evaluation of our business or integrity.

Item 10 – Other Financial Industry Activities and Affiliations

Paraiba Wealth Management is not and does not have a related person that is a broker/dealer, municipal securities dealer, government securities dealer or broker, an investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund), another investment adviser or financial planner, a futures commission merchant, commodity pool operator, or commodity trading advisor, a banking or thrift institution, an accountant or accounting firm, a lawyer or law firm, an insurance company or agency, a pension consultant, a real estate broker or dealer, and a sponsor or syndicator of limited partnerships.

We are an independent investment registered adviser and only provide investment advisory services. We are not engaged in any other business activities and offer no other services except those described in this Brochure.

Social Media and Digital Content

Paraiba Wealth maintains a presence on various social media and digital platforms, including YouTube (operating under the channel name "UNINDEXED"). These accounts are used for educational, informational, and marketing purposes.

No Investment Advice

Content posted on our social media channels—including videos, charts, posts, and replies—is for informational and educational purposes only and should not be considered personalized investment advice or a recommendation to buy or sell any specific security. The strategies and investment concepts discussed (e.g., investment portfolios, active management) may not be suitable for all investors. Viewers should not treat any social media post as a substitute for an individualized financial plan or consultation with a qualified professional.

Third-Party Content (Likes, Shares, and Comments)

Our firm may occasionally "like," "share," "retweet," or comment on posts from third parties. These actions are intended to facilitate conversation or highlight interesting data points and do not constitute an endorsement or approval of the third party, their views, or their services. Paraiba Wealth has no control over, and is not responsible for, the content posted by third parties.

Testimonials and Endorsements (Comments and Reviews)

Under the SEC Marketing Rule and applicable California regulations, public comments, "likes," or reviews left by clients or other individuals on our social media pages may be considered "testimonials" or "endorsements."

- **No Solicitation:** Unless explicitly stated, Paraiba Wealth does not compensate individuals (in cash or non-cash benefits) for social media comments or reviews.
- **No Cherry-Picking:** We do not selectively publish favorable comments or hide unfavorable ones, except where necessary to remove spam, offensive language, or content that violates platform terms of service.
- **Client Status:** Public social media users may or may not be current clients of Paraiba Wealth. You should not assume that any individual commenter is a client unless they explicitly identify themselves as such.

"UNINDEXED" YouTube Channel

Alvin Yam, the founder of Paraiba Wealth, creates content for the YouTube channel "UNINDEXED." While this channel discusses financial markets and investment theories, it is distinct from the advisory services provided to Paraiba Wealth clients.

- **General Nature:** Videos often use hypothetical examples or historical data (e.g., case studies on planning topics) to illustrate concepts. These are not guarantees of future performance.
- **Conflicts of Interest:** The firm or its employees may hold positions in securities discussed on the channel. However, our trading policy prohibits "front-running" or trading ahead of client accounts to disadvantage clients based on public content release.

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

Code of Ethics Summary

An investment adviser is considered a fiduciary and has a fiduciary duty to all clients. Paraiba Wealth Management has established a Code of Ethics to comply with the requirements of the securities laws and regulations that reflects its fiduciary obligations and those of its supervised persons. The Code of Ethics also requires compliance with federal securities laws. Paraiba Wealth Management's Code of Ethics covers all individuals that are classified as "supervised persons". All employees, officers, directors and investment adviser representatives are classified as supervised persons. Paraiba Wealth Management requires its supervised persons to consistently act in your best interest in all advisory activities. Paraiba Wealth Management imposes certain requirements on its affiliates and supervised persons to ensure that they meet the firm's fiduciary responsibilities to you. The standard of conduct required is higher than ordinarily required and encountered in commercial business.

This section is intended to provide a summary description of the Code of Ethics of Paraiba Wealth Management.

Affiliate and Employee Personal Securities Transactions Disclosure

Paraiba Wealth Management or supervised persons of the firm buy and sell for their personal accounts, investment products identical to those recommended to clients. This creates a conflict of interest. It is the express policy of Paraiba Wealth Management that all persons associated in any manner with our firm must place clients' interests ahead of their own when implementing personal investments. As is required by our internal procedures manual, Paraiba Wealth Management and its supervised persons will not buy or sell securities for their personal account(s) where their decision is derived, in whole or in part, by information obtained as a result of employment or association with our firm unless the information is also available to the investing public upon reasonable inquiry.

We are now and will continue to be in compliance with applicable state and federal rules and regulations. To mitigate conflicts of interest that can occur when access persons manage their personal accounts at the same time Paraiba Wealth Management manages client accounts, we have developed written supervisory procedures that include personal investment and trading policies for our representatives, employees and their immediate family members.

Item 12 – Brokerage Practices

If Paraiba Wealth Management assists in the implementation of any recommendations, we are responsible to ensure that the client receives the best execution possible. Best execution does not necessarily mean that clients receive the lowest possible commission costs but that the qualitative execution is best. In other words, all conditions considered, the transaction execution is in your best interest. When considering best execution, we look at a number of factors besides prices and rates including, but not limited to:

1. Execution capabilities (e.g., market expertise, ease/reliability/timeliness of execution, responsiveness, integration with our existing systems, ease of monitoring investments)
2. Products and services offered (e.g., investment programs, back-office services, technology, regulatory compliance assistance, research and analytic services)
3. Financial strength, stability and responsibility
4. Reputation and integrity
5. Ability to maintain confidentiality

We exercise reasonable due diligence to make certain that best execution is obtained for all clients when implementing any transaction by considering the back-office services, technology and pricing of services offered.

Brokerage Recommendations

Paraiba Wealth Management may recommend/require that clients establish brokerage accounts with Schwab Advisor Services, a division of Charles Schwab & Co., Inc. ("Schwab"), a FINRA-registered broker-dealer, Member SIPC, to maintain custody of clients' assets and to effect trades for their accounts. Although Paraiba Wealth Management may recommend, and in some cases require, clients to establish accounts at Schwab, it is the client's ultimate decision to custody assets with Schwab and clients must execute all required Schwab paperwork and forms to open an Account.

Paraiba Wealth Management is independently owned and operated and not affiliated with Schwab. Schwab provides Paraiba Wealth Management with access to its institutional trading and custody services, which are typically not available to Schwab retail investors. These services generally are available to independent investment advisors on an unsolicited basis, at no charge to them while the advisor's custodies assets at Schwab Advisor Services. These services are not contingent upon Paraiba Wealth Management committing to Schwab any specific amount of business (assets in custody or trading commissions). Schwab's brokerage services include the execution of securities transactions, custody, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require significantly higher minimum initial investment.

Schwab Advisor Services also makes available to Paraiba Wealth Management other products are services that benefit Paraiba Wealth Management but may not directly benefit clients' accounts. Many of these products and services may be used to service all or some substantial number of Paraiba Wealth Management' accounts, including accounts not maintained at Schwab.

Schwab's products and services that assist Paraiba Wealth Management in managing and administering clients' accounts include software and other technology that (i) provides access to client account data (such as trade confirmations and account statements); (ii) facilitate trade execution and allocate aggregated trade orders for multiple client accounts; (iii) provide research, pricing and other market data; (iv) facilitate payment of Paraiba Wealth Management's fees from some of its accounts; and (v) assist with back-office functions, recordkeeping and client reporting.

Schwab Advisor Services also offers other services intended to help Paraiba Wealth Management manage and further develop its business enterprise. These services may include: (i) compliance, legal and business consulting; (ii) publications and conferences on practice management and business succession; and (iii) access to employee benefits providers, human capital consultants and insurance providers. Schwab Advisor Services may discount or waive fees it would otherwise charge for some of these services or pay all or part of the fees of a third-party providing these services to Paraiba Wealth Management. Schwab Advisor Services may also provide other benefits such as educational events or occasional business entertainment of Paraiba Wealth Management personnel. While as a fiduciary, Paraiba Wealth Management endeavors to act in its clients' best interests, Paraiba Wealth Management 's

recommendation that clients maintain their assets in accounts at Schwab may take into account availability of some of the foregoing products and services and other arrangements not solely on the nature of cost or quality of custody and brokerage services provided by Schwab, which may create a conflict of interest.

Block Trading Policy

Our standard trading policy is to implement client orders on an individual basis. However, we can elect to purchase or sell the same securities for several clients at approximately the same time. This process is referred to as aggregating orders, batch trading or block trading and is used by our firm when Paraiba Wealth Management believes such action may prove advantageous to clients. If and when we aggregate client orders, allocating securities among client accounts is done on a fair and equitable basis. Typically, the process of aggregating client orders is done in order to achieve better execution, to negotiate more favorable commission rates or to allocate orders among clients on a more equitable basis in order to avoid differences in prices and transaction fees or other transaction costs that might be obtained when orders are placed independently.

Paraiba Wealth Management uses the average price allocation method for transaction allocation. Under this procedure Paraiba Wealth Management will calculate the average price and transaction charges for each transaction included in a block order and assign the average price and transaction charge to each allocated transaction executed for the client's account. If and when we determine to aggregate client orders for the purchase or sale of securities, including securities in which Paraiba Wealth Management or our associated persons may invest, we will do so in accordance with the parameters set forth in the SEC No-Action Letter, SMC Capital, Inc. Neither we nor our associated persons receive any additional compensation as a result of block trades.

Item 13 – Review of Accounts

Account Reviews and Reviewers

For Asset Management Services, client accounts are reviewed at least quarterly to determine whether each client's investment portfolio remains suitable in light of the client's current investment objectives. A more frequent or immediate review which could result in a change in one or more of clients' investments--can be triggered by any one of the following events:

- Changes in a client's situation or investment objectives made known to the Firm;
- Changes involving an investment held by a significant number of Firm clients (such as significant changes in an investment's performance or risk level relative to other investments or changes in the management of a mutual fund);
- Changes in the Firm's economic or investment outlook or in its decisions concerning clients' portfolio compositions, and results from analysis of financial planning projections

- or modeling;
- Economic and market conditions, data, movements, and other information that may indicate the appropriateness of increasing or decreasing clients' investments in certain types of securities.

In this regard, the Firm intends to use market valuation data and other market information in order to evaluate whether to increase, decrease or otherwise modify clients' investments in certain types of securities (such as equity mutual funds). Clients may choose to receive reviews in person, by telephone, or online meetings.

For One-Time Financial Planning, there is only one level of review and that is the total review conducted to create the initial financial plan. Because One-Time Financial Planning services terminate upon presentation of the plan, no other reviews or updates are provided to your original financial plan unless you execute a new agreement for such services or sign up for our On-Going Financial Planning Services.

For On-Going Financial Planning, we will typically hold one or two client meetings with you throughout the year, as needed and agreed to with you and our firm. We also offer "as-needed" consultations, which are limited to consultations in response to a particular investment or financial planning issue raised or request made by you. The calendar is the main triggering factor for meetings. However, reviews could also be triggered by material market, economic or political events, or by changes in your financial situations (such as retirement, termination of employment, physical move, or inheritance). Although financial plans are always performed in accordance with your investment goals and objectives, do not include automatic monitoring of the investments held in your account(s), and therefore, automatic reviews of your account(s) are not provided under such services.

Managed account reviews and financial planning services are conducted by Alvin Yam, Managing Member and CCO, and Allan Yam, Managing Member, Investment Adviser Representative & Head of Research.

Statements and Reports

Clients receive a written brokerage account statement from the custodian that includes an accounting of all holdings and transactions in the account for the reporting period. In addition, we provide quarterly written reports, which typically include the following information: portfolio value at the beginning and end of the quarter, contributions, withdrawals, realized capital gains and losses, interest, dividends, management fees, and time-weighted rates of return for the quarter and year to date.

You are encouraged to always compare any reports or statements provided by us against the account statements delivered from the qualified custodian. When you have questions about your account statement, you should contact our firm and the qualified custodian preparing the

statement.

Item 14 – Client Referrals and Other Compensation

Paraiba Wealth Management does not directly or indirectly compensate any person for client referrals.

The only compensation received from advisory services is the fees charged for providing investment advisory services as described in Item 5 of this Disclosure Brochure. Paraiba Wealth Management receives no other forms of compensation in connection with providing investment advice.

We receive an economic benefit from Schwab in the form of the support products and services it makes available to us and other independent investment advisers whose clients maintain their accounts at Schwab. These products and services, how they benefit us, and the related conflicts of interest are described above (see Item 12 – Brokerage Practices). The availability of Schwab's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

Item 15 – Custody

Custody, as it applies to investment advisors, has been defined by regulators as having access or control over client funds and/or securities. In other words, custody is not limited to physically holding client funds and securities. If an investment adviser has the ability to access or control client funds or securities, the investment adviser is deemed to have custody and must ensure proper procedures are implemented. Paraiba Wealth Management is deemed to have custody of client funds and securities whenever Paraiba Wealth Management is given the authority to have fees deducted directly from client accounts.

Upon authorization from clients, Paraiba Wealth Management can affect asset/fund transfers from client accounts to one or more third parties designated, in writing, by the client without obtaining written client consent for each separate, individual transaction, as long as the client has provided us with written authorization to do so. Such written authorization is known as a Standing Letter of Authorization ("SLOA"). An adviser with authority to conduct such third party asset/fund transfers has access to the client's assets, and therefore has custody of the client's assets in any related accounts.

Based on an SEC no-action letter, we do not have to obtain a surprise annual audit, as we otherwise would be required to by reason of having custody, as long as we meet the following criteria:

1. The client provides a written, signed instruction to the qualified custodian that includes the

- third party's name and address or account number at a custodian;
2. The client authorizes us, in writing, to direct transfers to the third party either on a specified schedule or from time to time;
 3. The client's qualified custodian verifies the authorization (e.g., signature review) and provides a transfer of funds notice to client promptly after each transfer;
 4. The client can terminate or change the instruction;
 5. We have no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party;
 6. We maintain records showing that the third party is not a related party to us nor located at the same address as us; and
 7. The client's qualified custodian sends the client, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

We hereby confirm that we meet the above criteria. It should be noted that authorization to trade in client accounts is not deemed by regulators to be custody.

For accounts in which Paraiba Wealth Management is deemed to have custody, we have established procedures to ensure all client funds and securities are held at a qualified custodian in a separate account for each client under that client's name. Clients or an independent representative of the client will direct, in writing, the establishment of all accounts and therefore are aware of the qualified custodian's name, address and the manner in which the funds or securities are maintained.

Finally, account statements are delivered directly from the qualified custodian to each client, or the client's independent representative, at least quarterly. Clients should carefully review those statements and are urged to compare the statements against reports received from Paraiba Wealth Management. When clients have questions about their account statements, they should contact Paraiba Wealth Management or the qualified custodian preparing the statement.

When fees are deducted from an account, Paraiba Wealth Management is responsible for calculating the fee and delivering instructions to the custodian. At the same time Paraiba Wealth Management instructs the custodian to deduct fees from your account; Paraiba Wealth Management will send you an invoice itemizing the fee. Itemization will include the formula used to calculate the fee, the amount of assets under management the fee is based on, and the time period covered by the fee.

Item 16 – Investment Discretion

When providing asset management services, Paraiba Wealth Management maintains trading authorization over your Account and can provide management services on a discretionary basis. When discretionary authority is granted, we will have the authority to determine the type of securities and the amount of securities that can be bought or sold for your portfolio without obtaining your consent for each transaction.

You will have the ability to place reasonable restrictions on the types of investments that may be purchased in your Account. You may also place reasonable limitations on the discretionary power granted to Paraiba Wealth Management so long as the limitations are specifically set forth or included as an attachment to the client agreement.

Item 17 – Voting Client Securities

Paraiba Wealth Management generally does not vote proxies on behalf of Clients. We have determined that taking on the responsibilities for voting client securities does not add enough value to the services provided to you to justify the additional compliance and regulatory costs associated with voting client securities. Therefore, it is your responsibility to vote all proxies for securities held in Account.

You will receive proxies directly from the qualified custodian or transfer agent; we will not provide you with the proxies. You are encouraged to read through the information provided with the proxy-voting documents and make a determination based on the information provided. Although we do not generally vote for client proxies, if you have a question about a particular proxy feel free to contact us. However, you will have the ultimate responsibility for making all proxy-voting decisions.

Item 18 – Financial Information

This Item 18 is not applicable to this brochure. Paraiba Wealth Management does not require or solicit prepayment of more than \$500 in fees per client, six months or more in advance. Therefore, we are not required to include a balance sheet for the most recent fiscal year. We are not subject to a financial condition that is reasonably likely to impair our ability to meet contractual commitments to clients. Finally, Paraiba Wealth Management has not been the subject of a bankruptcy petition at any time.

Item 19 – Requirements for State-Registered Advisers

Management & Personnel

Alvin Yam: Managing Member, Lead Portfolio Manager & Chief Compliance Officer

Educational Background:

- University of California, San Diego, Bachelor of Arts, Political Science: 1993
- Fudan University, Chinese Language Certificate Program: 2002
- Loyola Marymount University, Master of Business Administration: 2008
- University of California, Los Angeles, Personal Financial Planning Program: 2012

- Certified Financial Planner (CFP®) certification: 2012

Business Experience:

- Paraiba Wealth Management, Managing Member & Lead Portfolio Manager: 06/2022 to Present.
- HSBC, Director: 05/2018 to 09/2022.
- Business Development Director, Asia Broadcast Satellite: 01/2016 to 03/2017.
- Executive Director, EXS Capital: 08/2014 to 09/2015.
- Certified Financial Planner (CFP®) Professional & Consultant: 10/2013 to Present.
- Westmount Asset Management, Senior Portfolio Manager: 06/2007 to 09/2013.
- Charles Schwab & Company, Inc., Vice President: 02/2004 to 06/2006.
- Far East National Bank, First Vice President: 01/2003 to 11/2003.
- Charles Schwab & Company, Inc., Manager & Investment Consultant: 01/1994 to 01/2002.

Allan Yam: Managing Member & Head of Research

Educational Background:

- University of California, Berkeley, Bachelor of Arts, Legal Studies: 1992
- Certified Financial Planner (CFP®) certification: 2014

Business Experience:

- Paraiba Wealth Management, Managing Member & Head of Research: 06/2022 to Present.
- Self-Employed: From 12/2008 through the Present, Allan Yam has spent his time focused on managing his personal, individual and family investment portfolios and opportunities. This includes management of investment rental properties and equities trading strategies.
- Redwoods Global Asset Management, Portfolio Manager, 03/2005 to 11/2008.
- Marcuard Family Office, Analyst: 11/2004 to 02/2005.
- Charles Schwab Investment Management: Associate Portfolio Manager, 09/1998 to 10/2004.

Other Business Activities

See Item 10 – Other Financial Industry Activities and Affiliations.

No Performance Based Fees

As previously disclosed in Item 6, Paraiba Wealth Management does not charge or accept performance-based fees.

No Arbitrations

Paraiba Wealth Management or any of its associated persons have not been the subject of any client arbitrations or similar legal disputes.

No Arrangement with Issuer of Securities

Paraiba Wealth Management and its management do not have any relationship or arrangement with any issuer of securities.

Conflicts of Interest

Per the requirements of CCR Section 260.238(k), we have fully disclosed all material conflicts of interest regarding Paraiba Wealth Management, our investment adviser representatives and our employees that could reasonably be expected to impair the rendering of unbiased and objective advice.

Privacy Policy Notice

At Paraiba Wealth Management LLC, we are committed to protecting the privacy and security of your personal information. This policy outlines how we collect, use, and safeguard your information to provide you with our advisory services.

Information We Collect

We collect certain nonpublic personal information, referred to as "Customer Information," to effectively provide our advisory services. This information may include:

- **Personal and Financial Details:** Information provided on applications or other forms, such as income, spending habits, investment objectives, financial goals, statements of account, and records concerning your financial condition and assets. This also includes information related to employee benefits, retirement plan interests, wills, trusts, mortgages, and tax returns.
- **Identifying Information:** Details like your name, age, address, and social security number.
- **Transaction Information:** Data concerning your transactions with us or with other entities involved in your financial activities, such as broker/dealers, clearing firms, or other chosen investment sponsors.
- **Third-Party Information:** Information received from consumer reporting agencies (e.g., credit bureaus) and other materials used to provide appropriate recommendations or fulfill service requests.

Information Sharing and Disclosure

As a rule, we do not disclose your nonpublic personal information to unaffiliated third parties. However, to provide our advisory services efficiently, we may share necessary nonpublic personal information with certain unaffiliated third parties who provide services to us, such as our attorneys, other consultants, brokers, and custodians. These parties may require access to your information in the ordinary course of providing their services.

Opt-Out Right: If you prefer that we do not disclose nonpublic personal information about you to nonaffiliated third parties (other than disclosures permitted by law), you may opt out of those disclosures. To exercise this right, please contact us at contact@paraibawealth.com.

Data Security

We are committed to safeguarding your nonpublic personal information. Access to your Customer Information is restricted to those representatives and employees within our Firm who require the information to perform their job responsibilities. We maintain physical, electronic, and

procedural safeguards that comply with federal regulations to protect your nonpublic personal information.

Former Clients

If you close your account(s) or become an inactive client, we will continue to adhere to the privacy policies described herein, as they may be amended from time to time.

Policy Updates and Delivery

We will provide you with a copy of our Privacy Policy Notice no later than when you establish a relationship with Paraiba Wealth Management LLC. If providing the notice at that time would delay your access to services, and you agree, we will deliver it within a reasonable timeframe following the transaction. We will also provide a copy to all current and existing clients at least annually.

Any changes to this Privacy Policy will result in a revised statement being provided to all affected clients prior to any new disclosure of information. Unless required or permitted by law, we will not share confidential information about you with nonaffiliated third parties. In the unlikely event of a fundamental policy change that would permit or require additional disclosures of your confidential information, we will provide written notice, and you will be given an opportunity to direct us on whether such disclosure is acceptable.

Contact Us

If you have questions about this privacy notice or the privacy of your customer information, please contact us at: contact@paraibawealth.com.