

FORM ADV PART 2B



Folionet Advisers, LLC

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May 2024

FORM ADV PART 2B

for

Juan L Santos

Chief Executive Officer and Chief Compliance Officer

Effective: May 2024

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Juan Santos (CRD #5656132) in addition to the information contained in the FA (“FA” or the “Adviser” - CRD # 300145) Disclosure Brochure.

If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the FA Disclosure Brochure or this Brochure Supplement, please contact us at (305) 432-2290 and/or support@folionet.com.

Additional information is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Juan L Santos

Item 2 - Educational Background and Business Experience

Juan Santos is the CEO and Chief Compliance Officer at Folionet Advisers LLC. Since January 2017, Mr. Santos has also been the CEO of broker dealer Folionet Financial LLC, a FINRA member. He oversees day to day management including trading, execution, settlements, AML/Compliance, HR, finance, and documentation, among others. Also, he prepares monthly financials, budgets, and projections. Mr. Santos, along with his team, manages a book of business for high net-worth individuals.

Mr. Santos is a lawyer by training, holding master's degrees in law (LLM) and business administration (MBA) from George Washington University and Florida International University, respectively. He holds FINRA licenses 4, 7, 24, and 66. In addition, he is CAMS (Certified Anti-Money Laundering Specialist), has authored several articles on Compliance/AML related topics, and has been invited as speakers on this topic to conferences as well. He is fluent in Spanish.

Mr. Santos started his professional career at the international law firm in Miami of Diaz Reus LLP. While at the firm he assisted domestic and international clients, mostly financial institutions, on BSA/AML Compliance matters, including agreements between banks, compliance manuals, policies, and others. However, after a year at the firm he decided to transfer to the financial services industry and started as Compliance Officer at Amerant Bank in Miami.

At Amerant, he monitored the portfolio of Latin American financial institution clients and its compliance with U.S. regulations. Specifically, he ensured proper structuring and documentation of all correspondent bank and subsidiary accounts to comply with terms and procedures, including reviews of their AML Manuals, CIP Programs, and corporate information. In addition, he was assigned to review, monitor, and report all relevant transactions to senior management, and recommended and drafted SAR's. Also, he prepared and analyzed new account documentation for approval by the compliance unit and the Executive Committee.

After Amerant, Mr. Santos was hired by Standard Chartered Bank (formerly American Express Bank) in Miami as a Compliance Manager, leading a team of several analysts and overseeing all BSA/AML matters. In addition, he chaired the bank's and broker/dealer's AML/Compliance Committee. He conducted enhanced due diligence reviews on portfolios and validated transaction documentation. Mr. Santos also drafted policies and procedures for the institution's Compliance Department and provided reports and presentations to Senior Management on account activities and customer complaints. Further, he provided training sessions to Compliance, Operations and Sales Department. Lastly, one of his main responsibilities was to draft and file all SAR's, and USA Patriot Act 314b communications.

And last, prior to forming his own broker dealer Mr. Santos worked for close to 8 years at Vectorglobal WMG (broker dealer) and Vectorglobal IAG (Investment Advisor). During his tenure there he escalated positions from Financial Advisor, to Director, Senior Director and finally

Branch Manager overseeing more than 40 advisors in 6 offices. As a member of Senior Management, he provided support on external audits, SEC/FINRA audits, and dealt with customer complaints. Also, he reviewed and approved all new accounts, monitored client activity to ensure AML Compliance, and product suitability. Further, he ensured the broker dealer was compliant with foreign regulations in countries where business was conducted and assisted Senior Management in hiring, training, and terminating personnel.

While at Vectorglobal Mr. Santos also managed directly more than 150 clients located in the US and abroad and advised these individuals and entities in their investments strategies which included investments in fixed income, equities, structured products, options, and mutual funds.

Item 3 - Disciplinary Information

Juan Santos is not subject to legal or disciplinary events that are material to a client or prospective client's evaluation of him or the services offered by him.

Item 4 - Other Business Activities

Juan Santos is the CEO of Folionet Financial LLC. He allocates his time approximately as follows:

- | | |
|---|-----|
| <input type="checkbox"/> Folionet Advisers LLC (the investment adviser) | 10% |
| <input type="checkbox"/> Folionet Financial LLC (the broker-dealer) | 90% |

He is not actively engaged in any other investment-related business or occupation. Further, he is not actively engaged in any other business or occupation for compensation. "Actively engaged" is deemed to mean the business activity represents more than 10 percent of his time and income.

Item 5 - Additional Compensation

As the CEO of Folionet Financial LLC, Juan Santos may receive periodic distributions. Although potentially a conflict of interest, periodic reviews of this conflict are performed to mitigate it and both entities are normally audited according to the regulatory framework.

Item 6 - Supervision

Supervision and oversight of the activities conducted through FA is conducted by Juan Santos, Managing Member, Advisory Representative and Designated Supervisor of FA. FA is a Florida State investment adviser and is subject to investment adviser rules and regulations. Further, as an investment adviser, has an obligation to act in your best interest.

Item 7 - Requirements for State-Registered Advisers

Juan Santos has not been involved in any arbitration claim or civil, self-regulatory organization, or administrative proceeding involving an investment or investment-related business or activity, fraud, false statement(s), or omissions, theft, embezzlement, or other wrongful taking of property, bribery, forgery, counterfeiting, or extortion, or dishonest, unfair, or unethical practices. Additionally, he has not been the subject of a bankruptcy petition.

FORM ADV PART 2B

for

Antonella Pisano Contreras
Investment Advisor

Effective: May 2024

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Antonella Pisano Contreras (CRD# 7510808) in addition to the information contained in the FA (“FA” or the “Adviser” - CRD # 300145) Disclosure Brochure.

If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the FA Disclosure Brochure or this Brochure Supplement, please contact us at (305) 432-2290 and/or support@folionet.com.

Additional information is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Antonella Pisano Contreras

Item 2 - Educational Background and Business Experience

Antonella Pisano Contreras has been an Associate at Folionet Financials LLC since March of 2022. Ms. Pisano has also been an Investment Adviser at Folionet Advisers LLC since August of 2023. In her current capacity, Ms. Pisano performs numerous tasks, mainly assisting Juan Santos in managing a book of clients of over 200 domestic and international accounts. Ms. Pisano provides her support by executing trades, account openings, conducting performance evaluation, asset allocation presentations and investments selection. She also drafts investment presentations for clients, incorporating educational content, and assists in selecting strategies to enhance portfolio performance.

Ms. Pisano holds a bachelor's in business administration from Universidad Metropolitana in Caracas, Venezuela, where she graduated 1st of her class. She is currently pursuing a master's degree in financial management at EAE Business School in Madrid, Spain. In addition, she holds FINRA licenses 7 and 66, and is fluent in Italian and Spanish.

Ms. Pisano started her professional career as an Administrative Assistant at Proyectos Integrales Grupo Proinsa in Caracas, Venezuela, from January 2019 to December 2019, providing essential support to administrative professionals. During this time, she demonstrated her organizational skills and attention to detail while assisting with scheduling, communication preparation, filing, and meeting minutes.

In January 2020, she joined Folionet Financial LLC where she started as an intern, then she gradually escalated to different roles such as Data Analyst and Financial Analyst, before assuming her current position as an Associate.

Item 3 - Disciplinary Information

Antonella Pisano Contreras is not subject to legal or disciplinary events that are material to a client or prospective client's evaluation of her or the services offered by her.

Item 4 - Other Business Activities

Antonella Pisano Contreras is a Financial Associate at Folionet Financial LLC. She allocates her time approximately as follows:

- Folionet Advisers LLC (the investment adviser) 10%
- Folionet Financial LLC (the broker-dealer) 90%

She is not actively engaged in any other investment-related business or occupation. Further, she is not actively engaged in any other business or occupation for compensation. "Actively engaged" is deemed to mean the business activity represents more than 10 percent of her time and income.

Item 5 - Additional Compensation

As an Associate at Folionet Financial LLC, Ms. Pisano received a fixed monthly income. Although potentially a conflict of interest, periodic reviews of this conflict are performed to mitigate it and both entities are normally audited according to the regulatory framework.

Item 6 - Supervision

Supervision and oversight of the activities conducted through FA is conducted by Juan Santos, Managing Member, Advisory Representative and Designated Supervisor of FA. FA is a Florida State investment adviser and is subject to investment adviser rules and regulations. Further, as an investment adviser, has an obligation to act in your best interest.

Item 7 - Requirements for State-Registered Advisers

Antonella Pisano Contreras has not been involved in any arbitration claim or civil, self-regulatory organization, or administrative proceeding involving an investment or investment-related business or activity, fraud, false statement(s), or omissions, theft, embezzlement, or other wrongful taking of property, bribery, forgery, counterfeiting, or extortion, or dishonest, unfair, or unethical practices. Additionally, she has not been the subject of a bankruptcy petition.