Item 1: Cover Page



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Form ADV Part 2A
(Disclosure brochure)

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This brochure provides information about the qualifications and business practices of Wealthrise (CRD #343585). If you have any questions about the contents of this brochure, please contact us at (404)729-0478. 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 as a registered investment advisor does not imply a certain level of skill or training.

If you have any questions about the contents of this Brochure, please contact us at help@getwealthrise.com. Additional information about Wealthrise also is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2: Material Changes

This is a new brochure and there has not been a previous annual update. Therefore, there are no changes to report.

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Item 4: Advisory Business

Wealthrise, Inc. ("Wealthrise," "we," "us", or “Advisor”) was formed in June 2026. Wealthrise is registered as an investment adviser with the U.S. Securities and Exchange Commission ("SEC"), since August 2026.

Nishant Panchal, Founder and Chief Executive Officer, is the principal owner of Wealthrise.

Investment Advisory Services

Wealthrise provides fee-only, Internet-based discretionary portfolio management services to individual clients through the Wealthrise website. A client who engages Wealthrise enters into an investment advisory agreement and links an eligible brokerage account to the service. Wealthrise manages the account on a discretionary basis in accordance with the investment advisory agreement, the client's profile, and any accepted restrictions. Wealthrise uses quantitative models and predefined trading rules to manage client accounts. Wealthrise's strategies primarily invest in exchange-traded funds, including leveraged, inverse, and leveraged-inverse ETFs. Additional information about the strategies and their material risks is provided in Item 8 Methods of Analysis, Investment Strategies and Risk of Loss, below.

Wealthrise offers two investment strategies that will differ based on the level of leverage:

1. Alpha Strategy Normal Tier: This strategy uses 2x leveraged and inverse ETFs, such as QLD and QID, with predefined model driven signals and risk controls.
2. Alpha Strategy Advanced Tier: This strategy uses 3x leveraged and inverse ETFs, such as TQQQ and SQQQ, under the same core algorithmic framework as the Alpha Strategy Normal Tier. Because 3x products can amplify both gains and losses, this tier carries greater volatility and risk.

Both tiers are subject to account-type, client profile, broker permissions, and client eligibility requirements.

Wealthrise utilizes a quantitative analysis technique that draws from technical analysis methods to construct portfolios and help clients make decisions about investing in rule-based strategies and in formulating investment advice/managing assets for clients. Wealthrise uses predefined software-based models and algorithms in formulating investment advice. Analysis methods may include momentum signals, mean-reversion signals, trend strength indicators, settlement controls for cash accounts, predefined risk controls, position sizing rules, market data, account data, and broker/account restraints. The Advisor may recommend, on occasion, redistributing investment allocations to diversify the portfolio in an effort to reduce risk and increase performance. The Advisor may recommend employing cash positions as a possible hedge against market movement that may adversely affect the portfolio. The Advisor may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or

sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position(s) in the portfolio, change in risk tolerance of client, or any risk deemed unacceptable for the client's risk tolerance.

Client Profile, Tailoring, and Investment Restrictions

Prior to managing a client's account, Wealthrise obtains information through its website regarding the client's financial goals, tolerance for risk, investment experience, financial circumstances, and other information requested by Wealthrise. Wealthrise uses this information to determine whether the service and strategy are appropriate for the client. Clients are responsible for promptly updating this information when their circumstances or objectives change. A client may request reasonable restrictions on investments or types of investments. Wealthrise will review each request to determine whether it can reasonably be implemented consistently with the selected strategy, applicable law, operational capabilities, and the client's objectives.

Wealthrise does not participate in or sponsor a wrap fee program.

Assets Under Management

As of July 15, 2026, Wealthrise managed $0 in client assets on a discretionary basis and $0 in client assets on a non-discretionary basis.

Item 5: Fees and Compensation

Investment Advisory Fees

Pursuant to an agreement entered into with the client, the client will pay Wealthrise an annual advisory fee, payable quarterly in arrears. For fee purposes, "Strategy Allocation" means the portion of a client's connected brokerage account designated for the Wealthrise strategy. The Strategy Allocation is used solely to calculate investment advisory fees and performance fees (discussed in Item 6 Performance Fees, below) and does not limit Wealthrise's discretionary authority under the investment advisory agreement. The fee will be based on the active strategy or strategies selected and the value of the Strategy Allocation. The advisory fee may be adjusted to account for significant contributions or withdrawals made to the Strategy Allocation during the quarter. New account fees will be prorated from the date advisory services begin through the end of the billing quarter in which the account is opened. Fees may also be prorated based on account strategy changes implemented after updates to the client profile.

Fee Schedule

Wealthrise charges non-negotiable management fees, billed quarterly in arrears:

1. Alpha strategy Normal Tier: 2.50% per annum
2. Alpha strategy Advanced Tier: 3.00% per annum

The selected annual rate applies to the entire Strategy Allocation, not on a progressive or marginal tier basis. The management fee for each billing period is calculated as: applicable annual rate × average daily Strategy Allocation during the billing period × number of days in the billing period / 365. Average daily Strategy Allocation is the sum of the end-of-day Strategy Allocation for each day in the billing period divided by the number of days in that period.

Deposits, withdrawals, and client-authorized changes to Strategy Allocation are reflected in the calculation beginning on their effective date. New accounts and accounts terminated during a calendar quarter are charged only for the days Wealthrise provides advisory services during that quarter. The $10,000 minimum applies to both tiers, except Wealthrise may accept IRA accounts below $10,000.

Wealthrise utilizes a third-party payment processor to collect advisory fees, such as Stripe or PayPal. Clients will input their credit card or bank account information in the third-party platform and provide written authorization permitting the Advisor to be paid directly from their credit card or bank account on a quarterly basis. Wealthrise will never have access to the client's credit card or bank account information and therefore will not be deemed to have actual custody. However, Wealthrise is deemed to have constructive custody of client funds by virtue of its limited authority to charge the client's credit card or request an ACH/wire transfer to pay its advisory fees. Wealthrise complies with certain safeguards around the direct payment of fees, including the following: (1) the Advisor has custody of client funds solely as a consequence of its authority to direct the third-party credit card payment processor to pay its advisory fee; (2) the Advisor will obtain client's written authority to have advisory fees charged to the client's credit card on a quarterly basis by the third-party processor; (3) the Client will receive statements not less than quarterly from the qualified custodian; and (4) the Advisor has notified applicable securities regulators, in writing, that it intends to use these safeguards. In addition, Wealthrise will also send a quarterly invoice to the client outlining the fee calculation and time period covered.

Advisory fees are billed quarterly in arrears. Wealthrise does not collect advisory fees in advance. Either party may terminate advisory services at any time by providing written notice to the other party. For a client paying a management fee, Wealthrise will calculate the fee through the date advisory services cease using the daily fee calculation described above. Performance-fee arrangements are calculated as described in Item 6. For a terminating account, Wealthrise will calculate the management fee through the date advisory services cease using the daily fee calculation described above. Wealthrise will provide a final itemized invoice promptly after termination, and the client remains responsible only for fees accrued through that date.

All fees paid to Wealthrise for investment advisory services, including either management fees or performance fees, as applicable, are separate from the costs and expenses clients may incur through their investments and brokerage accounts. Investment-product expenses may include exchange-traded fund and other fund management fees and operating expenses, which are reflected in the value or performance of the applicable investment and described in the fund's prospectus. Clients may also incur brokerage

commissions, markups or markdowns, bid-ask spreads, exchange and regulatory fees, American Depositary Receipt fees, wire, transfer, account, or other charges imposed by their custodian, broker-dealer, or another third party. These costs are separate from Wealthrise's fees, may reduce investment returns, and may be material when trading occurs frequently. See Item 12 Brokerage Practices, below, for additional information about brokerage and execution practices.

Clients that sign up for Wealthrise's investment management services will open an account online with Alpaca Securities LLC ("Alpaca") or Open to the Public Investing, Inc. ("Public"), each a non-affiliated FINRA registered broker-dealer, member SIPC.

Neither Wealthrise nor its supervised persons accept compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

Item 6: Performance-Based Fees and Side-by-Side Management

Qualified clients, as defined by Rule 205-3 of the Investment Advisers Act, may enter into advisory agreements where Wealthrise is entitled to a performance fee instead of a management fee. Qualified clients must meet one or more of the following requirements:

i. Client is a natural person who, or a company that, immediately after entering into the contract has at least $1,400,000 under the management of the Advisor;

ii. Client is a natural person who, or a company that, immediately prior to entering into the contract, has a net worth (together, in the case of a natural person, with assets held jointly with a spouse) of more than $2,700,000 at the time the contract is entered into (excluding the equity in the Clients' primary residence) reduced by any indebtedness that is secured by the Client's primary residence in excess of the estimate fair market value of the residence;

iii. Client is a qualified purchaser as defined in section 2(a)(51)(A) of the Investment Company Act of 1940 at the time the contract is entered into.

Suitability will be determined through due diligence inquiries determined to be appropriate in the circumstances by Wealthrise's internet-based software systems. Wealthrise, at its sole discretion, may reject any client application where the above financial standards are not met and/or where it reasonably believes the investor lacks the necessary financial sophistication, who purport to not fully understand Wealthrise's method of compensation and the nature of its risks, or who are otherwise deemed to be unsuitable for such an arrangement.

The firm may receive a performance fee equal to 15% of Net Profit for each calendar quarter (January 1 through March 31, April 1 through June 30, July 1 through September 30, and October 1 through December 31). For this purpose, Net Profit equals the positive amount by which the end-of-quarter value of the Strategy Allocation exceeds its adjusted high-water mark, before deduction of the performance fee. A performance fee is charged only when both of the following conditions are met: (i) the Strategy Allocation's time-weighted return for the quarter exceeds the total return of Invesco QQQ Trust, Series 1 (QQQ), calculated using QQQ adjusted closing prices for the same quarter; and (ii) the Strategy Allocation has positive Net Profit above its adjusted high-water mark. The Strategy Allocation's time-weighted return is calculated by linking sub-period returns in a manner that neutralizes the effect of external cash flows. The adjusted high-water mark is the prior post-fee high-water mark, increased dollar-for-dollar for contributions to the Strategy Allocation and reduced dollar-for-dollar for withdrawals from it, including client-initiated changes to the Strategy Allocation. Losses do not reduce the high-water mark. When a performance fee is charged, the high-water mark is reset to the Strategy Allocation's post-fee value. The benchmark for each calendar quarter will be Invesco QQQ Trust, Series 1 (QQQ) and will not be changed retroactively. For an account terminated during a calendar quarter, QQQ performance will be measured from the first day of that quarter through the termination date.

The performance fee will be calculated at the end of each calendar quarter and charged to the client's credit card or bank account instead of any management fee. For accounts terminated before the end of the calendar quarter, the Advisor will calculate the performance fee for the period from the beginning of the quarter through the termination date and will collect the performance fee through the third-party payment processor described in Item 5. See Item 5 Fees and Compensation, above, for a discussion of safeguards around charging fees directly to the client's credit card.

There is an inherent conflict of interest when a firm charges performance-based fees to some accounts and management fees based on a percentage of assets under management to other accounts, in that an advisor is incented to favor the accounts from which it will earn higher compensation. To mitigate this conflict, Wealthrise provides its advisory services equally to all client accounts, including those clients who are not charged a performance fee. These services include evaluation of investor suitability and adhering to the investor risk profile when making investment decisions, client communications and account reviews that are the same for all clients, and impartial application of Wealthrise's internet-based investment advisory services. In addition, the firm maintains trading policies and a Code of Ethics that are intended to deliver consistency, that no one client is favored over another.

Another conflict of interest concerning accounts with performance-based fees is that the advisor is incented to use higher risk investments than called for by the client risk profile. Such investments may generate higher returns, which in turn would generate higher performance-based fees for the advisor. Wealthrise has a fiduciary obligation to its clients to put the interest of its clients first over and above the interests of the firm and its associated persons. A performance fee arrangement is optional. At any time during or after

onboarding, a client may elect to submit proof documents to prove qualified client eligibility. Wealthrise will review the information submitted and verify the client satisfies the applicable qualified-client requirements before a performance fee arrangement becomes effective. Once verified, a client may elect a performance- fee arrangement for one or more eligible strategies, subject to the applicable advisory agreement. Any election is effective only prospectively.

In addition, Wealthrise attempts to further mitigate this conflict by maintaining suitability and employing trading policies and procedures designed to assist the Advisor in further meeting its fiduciary obligations to adhere to the client's agreed upon risk profile. Electing a performance fee arrangement does not alter the client's selected strategy, risk parameters, model-driven investment process, trade timing, or trade-allocation process. For clients enrolled in the same strategy and with comparable risk parameters, Wealthrise applies the same investment process without regard to account size or whether the client pays a performance-based fee.

Item 7: Types of Clients

Wealthrise will principally offer its services to individuals and high-net worth individuals.

The Advisor's cumulative minimum account requirement for opening and maintaining an account is $10,000 for both the Normal and Advanced tiers. Wealthrise may accept an IRA account with a balance below $10,000 as an exception. However, based on facts and circumstances the Advisor may, at its sole discretion, accept accounts with a lower value.

The Adviser requires that clients who agree to a performance fee be qualified clients under Rule 205-3. Generally, a qualified client must have either at least $1,400,000 under the Adviser's management or net worth of more than $2,700,000, excluding the value of the primary residence and calculated in accordance with Rule 205-3.

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

Wealthrise utilizes a quantitative analysis technique that draws from technical analysis methods to construct portfolios and help clients make decisions about investing in rule-based strategies and in formulating investment advice/managing assets for clients. Wealthrise's website, its methods of analysis, and investment strategies are utilized across all of Wealthrise's clients as applicable for their individual portfolios, constraints, and objectives.

Technical analysis is a method of evaluating securities by relying on the assumption that market data, such as charts of price, volume and open interest can help predict future (usually short-term) market trends. Technical analysis assumes that market psychology influences trading in a way that may help identify trends or potential opportunities, but cannot reliably predict future price movements.

Wealthrise uses predefined software-based models and algorithms in formulating investment advice. Analysis methods may include momentum signals, mean-reversion signals, trend strength indicators, settlement controls for cash accounts, predefined risk controls, position sizing rules, market data, account data, and broker/account restraints.

Wealthrise primarily recommends leveraged, inverse, and leveraged-inverse ETFs. These products are complex and involve heightened investment risk. Wealthrise's models may recommend these ETFs based on applicable strategy signals and market conditions. These products are designed to multiply or invert the performance of a certain index or benchmark. For example, Wealthrise's algorithm might recommend that a portfolio buy a position in a leveraged ETF in an attempt to potentially boost returns on a stock index projected to increase in value; Wealthrise's algorithm might seek exposure in an inverse ETF to provide the potential for temporary protection from falling markets.

Leveraged, inverse, and leveraged-inverse products are not intended to be buy-and-hold investments. At the end of each trading session these products reset their investment strategies in order to maintain their leverage ratio. Resetting can result in a difference in returns of the product in comparison to the underlying index or benchmark. Failing to divest can result in compounded losses despite the underlying index or benchmark moving in the desired direction, especially in volatile markets. Therefore, Wealthrise does not use a fixed holding period for these positions. Its models evaluate buy and sell signals, market conditions, macroeconomic indicators, and the client's applicable strategy and risk parameters when determining whether to purchase, retain, reduce, or sell a position. Holding periods therefore vary by position and market conditions.

One method of analysis or investment strategy is not more significant than the other as the Advisor is considering the client's portfolio, risk tolerance, time horizon and individual goals. However, the client should be aware that with any trading that occurs in the client account, the client will incur transaction and administrative costs.

Investing includes the risk that the value of an investment can be negatively affected by factors specifically related to the investment (e.g., capability of management, competition, new inventions by other companies, lawsuits against the company, labor issues, patent expiration, etc.), or to factors related to investing and the markets in general (e.g., the economy, wars, civil unrest or terrorism around the world, concern about oil prices or unemployment, etc.).

The primary risks in technical analysis are that the factors used to analyze the price, trends and volatility of a security may not be replicated, or the outcomes of such analysis will not be the same as in past periods where similar combinations existed. Because of the reliance

on trends, technical analysis can signal buying at market peaks and selling at market troughs.

All investments involve some degree of risk. In finance, risk refers to the degree of uncertainty and/or potential financial loss inherent in an investment decision. In general, as investment risks rise, investors seek higher returns to compensate themselves for taking such risks. *Clients need to be aware that investing in securities involves risk of loss that clients need to be prepared to bear.*

Every saving and investment product has different risks and returns. Differences include how readily investors can get their money when they need it, how fast their money will grow, and how safe their money will be. The material risks of leveraged, inverse, and leveraged-inverse ETFs include elements from each of the securities types listed below.

Risks that apply to Equity Strategies, including ETFs:

- **Management Risk**: Due to its passive and defensive management, a portfolio could underperform other portfolios with similar investment objectives and/or strategies.
- **Allocation Risk**: A portfolio may use an asset allocation strategy in pursuit of its investment objective. There is a risk that a portfolio's allocation among asset classes or investments will cause a portfolio to lose value or cause it to underperform other portfolios with a similar investment objective and/or strategy, or that the investments themselves will not produce the returns expected.
- **Sector/Industry Risk**: The risk that the strategy's concentration in equities in a specific sector or industry will cause the strategy to be more exposed to the price movements in and developments affecting that sector
- **Market and Timing Risk**: Prices of securities may become more volatile due to general market conditions that are not specifically related to a particular company, such as adverse economic conditions or outlooks, adverse investor sentiment, changes in the outlook for corporate earnings, or changes in interest rates.
- **Event Risk**: The possibility that an unforeseen event will negatively affect a company or industry, and thus, increase the volatility of the security.
- **Liquidity Risk**: The risk that exists when a security's limited marketability prevents it from being bought or sold quickly enough to avoid or minimize a loss.

Risks of Investing in Stocks:

All investments involve some degree of risk. In finance, risk refers to the degree of uncertainty and/or potential financial loss inherent in an investment decision. In general, as investment risks rise, investors seek higher returns to compensate themselves for taking such risks.

Every saving and investment product has different risks and returns. Differences include how readily investors can get their money when they need it, how fast their money will grow, and how safe their money will be.

- **Business Risk**: With a stock, you are purchasing a piece of ownership in a company. With a bond, you are loaning money to a company. Returns from both of

these investments require that the company stays in business. If a company goes bankrupt and its assets are liquidated, common stockholders are the last in line to share in the proceeds. If there are assets, the company's bondholders will be paid first, then holders of preferred stock. If you are a common stockholder, you get whatever is left, which may be nothing.

- **Volatility Risk**: Even when companies aren't in danger of failing, their stock price may fluctuate up or down. Large company stocks as a group, for example, have lost money on average about one out of every three years. Market fluctuations can be unnerving to some investors. A stock's price can be affected by factors inside the company, such as a faulty product, or by events the company has no control over, such as political or market events.
- **Liquidity Risk**: This refers to the risk that investors won't find a market for their securities, potentially preventing them from buying or selling when they want. This can be the case with the more complicated investment products.

Risks of Investing in Options:

Options are financial contracts that have values derived from underlying assets. Like stocks, bonds, and ETFs, options carry no guarantees, and investors in options may lose the entire principal invested or more. Using options on an underlying security creates risks that are different from investing in that security, and unique skills may be required to use options strategies effectively. Option prices tend to be much more volatile than their underlying securities due to leverage that is fundamental to their design which can magnify the price changes in the option relative to the underlying. Option sellers tend to bear significantly more risk than option buyers. While the maximum loss of a purchased option is generally limited to the option's price, a written (or sold) option can incur losses in excess of the value of the option or collateral required. For example, a short put option by itself can incur a loss equal to the strike price if the stock price goes to zero. A short call option by itself can theoretically have unlimited losses if the underlying stock price increases significantly past the strike price. The performance of an option strategy is influenced by the selection of underlying securities, expiration dates and strike prices. Similar option strategies using different underlying securities can have significantly different results. The success or failure of option strategies to accomplish their objectives can be significantly impacted by timing of market price movements relative to the expirations of long and short options held in the portfolio. Additionally, similar option strategies with different strike price selections can have significantly different results over time.

Risks of Uncovered Options Strategies:

An uncovered option strategy refers to an option that does not have an offsetting position in the underlying asset. Any investor who sells an option has a potential obligation. That obligation is met, or covered, by having a position in the security that underlies the option. If the investor sells the option but has no position in the underlying security, then the position is said to be uncovered, or naked. Uncovered put options are inherently risky because of the limited upside profit potential, and at the same time holding a significant downside loss potential. The maximum loss is theoretically significant because the price of the underlying security can fall to zero. The higher the strike price, the higher the potential loss. Uncovered call options are also inherently risky because of the limited upside profit potential, and a

theoretically unlimited downside loss potential. Maximum loss is theoretically unlimited because there is no cap on how high the price of the underlying security can rise. Uncovered options are only suitable for experienced investors who understand the risks and can also afford substantial losses.

Risks of Investing in Futures Contracts:

Futures contracts are financial derivatives that oblige the buyer to purchase an underlying asset (or the seller to sell that asset) at a predetermined future price and date. Futures contracts are speculative or hedging in nature, with the investor "betting" on the direction of a security, commodity, or financial instrument, either long or short, using leverage. Because hedging can be used in futures trading, it is possible to sustain losses greater than the investor's original investment. In a futures contract, it is not that the actual asset a trader is investing in that carries more inherent risk. Rather, it is the additional risk that comes from the nature and process of how futures contracts are traded.

Margin Risks:

Trading on margin is a strategy that involves borrowing funds from a broker to purchase securities. A margin account increases purchasing power and allows investors to use someone else's funds to increase financial leverage. While this may offer the potential for increased gains, it also presents greater risks. Purchasing securities on margin amplifies the effects of losses, and the broker may issue a margin call, which requires the investor to liquidate its position or provide additional capital to keep the investment open. Margin accounts are typically charged a rate of interest by the broker lending the funds to the investor, and the investor must repay the broker the initial loan amount plus the interest. Margin accounts must keep a minimum amount of equity in the account, which is the market value of the securities in the account less the margin loan amount. If the value of the securities in the margin account decreases, causing the equity to fall below the broker's pre-set maintenance level (generally 25-40%), the broker may issue a margin call. A margin call requires the investor to increase the equity in the account by liquidating securities or depositing additional cash. If the investor cannot meet the financial requirement, the broker may sell securities in the account without prior notification, in order to increase the equity in the account. Thus, trading on margin involves greater risk to the investor, and amplification of losses may result in the investor losing more than just the initial principal invested in the account.

Risks of Short Selling:

Traditionally, investors seek to profit from the rise in value of securities. Some investors, however, seek to profit from the decline in value of securities through short selling. This investment strategy involves borrowing a security whose price is anticipated to decline in value and then selling it on the open market. The investor can later buy back the security, hopefully at a lower price than for what it was initially sold for, and pocket the difference. While the strategy is straightforward, it is a speculative form of investing and involves considerable risk. Short selling requires the use of margin, which increases the cost of investment because of interest charges. Sudden changes in interest rates can result in higher than anticipated interest charges. But the greatest risk is the risk that the value of the

security could increase and the price can keep rising, resulting in potentially limitless losses. Losses can be further exacerbated during a short-squeeze, which occurs when a heavily shorted security unexpectedly rises in value, triggering a cascade of further price increases as other short-sellers are forced to buy the stock to close out their positions. Each wave of purchases further drives the stock price skyward, hurting anyone holding onto their short position.

Other Material Risks

Model Risk:
Wealthrise uses quantitative models to make investment recommendations, manage portfolios, and provide clients with software services. Quantitative models consist of formulas, algorithms, and methodologies for estimating unknown quantities from observable data. Errors may arise from inaccurate data, limitations of the models, implementation of the models, the choice of models, or application of such models, any of which could result in erroneous investment recommendations, decisions, or other actions that could negatively impact investment performance.

Systems Risk:
As an Internet-based investment advisor, Wealthrise makes extensive use of automated computer systems, including proprietary software, third-party software components, cloud services, and brokerage systems. Any of these components could suffer errors that may negatively impact Wealthrise's ability to provide investment recommendations, monitor risks, provide software services, or execute trades. Wealthrise may not be in a position to evaluate the risks and potential for error in third-party systems. Errors in these systems could cause erroneous trades or failures to trade. Additionally, human error using these systems could also cause investment losses.

Cyber Security Risk:
Wealthrise relies on computer systems to provide advisory and software services. While Wealthrise takes precautions to secure these systems, Wealthrise's ability to provide such services could still be impaired by a malicious actor breaching security mechanisms and disrupting proprietary systems, or those operated by the brokerage, custodian, or other party. A malicious actor could also breach systems security to access or disclose confidential client information. There is also a risk of inadvertent disclosure of confidential information.

Data Vendor Risk:
Wealthrise's automated systems rely on data from third-party vendors to make investment recommendations, manage portfolios, and provide clients with software services. Data errors or disruptions could adversely impact Wealthrise's ability to provide these services.

Item 9: Disciplinary Information

Neither Wealthrise nor its management persons have had any legal or disciplinary events, currently or in the past.

Neither Wealthrise nor its management persons have been subject to any criminal or civil actions, administrative proceedings, or self-regulatory organization (SRO) proceedings.

Item 10: Other Financial Industry Activities and Affiliations

Neither Wealthrise nor any of its management persons are registered, or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

Neither Wealthrise nor any of its management persons are registered or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

Wealthrise does not currently have any relationships or arrangements that are material to its advisory business or clients with either a broker-dealer, municipal securities dealer, or government securities dealer or broker, 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), other investment advisor or financial planner, futures commission merchant, commodity pool operator, or commodity trading advisor, banking or thrift institution, accountant or accounting firm, lawyer or law firm, insurance company or agency, pension consultant, real estate broker or dealer or sponsor of syndicator of limited partnerships.

Wealthrise does not recommend or select other investment advisors for clients.

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

Wealthrise is registered with the U.S. Securities and Exchange Commission and maintains a Code of Ethics pursuant to SEC rule 204A-1. Wealthrise has adopted a Code of Ethics that sets forth the basic policies of ethical conduct for all managers, officers, and employees of the Advisor. In addition, the Code of Ethics governs personal trading by each employee of Wealthrise deemed to be an Access Person and is intended to ensure that securities transactions effected by Access Persons of Wealthrise are conducted in a manner that

avoids any conflict of interest between such persons and clients of the Advisor or its affiliates. Wealthrise collects and maintains records of securities holdings and securities transactions effected by Access Persons. These records are reviewed to identify and resolve conflicts of interest. Wealthrise will provide a copy of the Code of Ethics to any client or prospective client upon request.

Wealthrise does not recommend to clients, or buy or sell for client accounts, securities in which the firm or a related person has a material financial interest.

Wealthrise and/or its investment adviser representatives may from time to time purchase or sell products that Wealthrise recommends to clients. Personal trading can create a conflict because personnel may have access to information about Wealthrise trading decisions. Wealthrise's signals are generated in real time, and eligible client accounts are generally traded nearly simultaneously as signals are triggered, which reduces the opportunity for a person to benefit from timing differences. To mitigate these conflicts, Wealthrise has adopted a Code of Ethics as noted above. Wealthrise's Code of Ethics is available upon request. Finally, supervised persons of registered investment advisors are fiduciaries by law and are required to put the client's interest before those of the firm and themselves.

Wealthrise requires that its investment adviser representatives follow its basic policies and ethical standards as set forth in its Code of Ethics.

Investment advisor representatives of Wealthrise may trade for their own accounts securities that are being traded for client accounts at or about the same time. To mitigate the conflict of interest in such circumstances, Wealthrise's policy is to require the trading of all relevant client accounts in such a manner as will preserve the client's interests ahead of the interests of the firm and its associated persons. The Chief Compliance Officer examines personal trading activities of Wealthrise's personnel to verify compliance with this policy.

Item 12: Brokerage Practices

Clients who use Wealthrise's investment management services must maintain an eligible brokerage account with Alpaca Securities LLC ("Alpaca") or Open to the Public Investing, Inc. ("Public"), each a non-affiliated FINRA-registered broker-dealer and member SIPC. Wealthrise selects and supports these broker-dealers based on execution capabilities, brokerage and custodial services, cost, quality of service, technology and account-access features, and industry reputation. Wealthrise considers, as applicable, transaction costs, speed and quality of execution, client-management tools, and convenience of access for Wealthrise and its clients.

Wealthrise may receive research, market data, technology, or other brokerage products or services in connection with brokerage arrangements. Any such benefits may be treated as soft-dollar benefits where permitted by applicable law. Wealthrise will address resulting

conflicts in compliance with Section 28(e) of the Securities Exchange Act of 1934 or applicable state securities rules.

Wealthrise seeks to obtain the most favorable execution reasonably available for client transactions through its supported broker-dealers, taking into account factors such as execution quality, transaction costs, reliability, and the services and technology available for the advisory program. Wealthrise does not pay brokerage commissions on behalf of clients, negotiate commission rates for client accounts, or receive research or other brokerage services in exchange for directing client transactions. The firm may enter into such transactions so long as it determines in good faith that the amount of commission paid was reasonable in relation to the value of the brokerage and research services provided by the broker. The services that may be considered in this determination of reasonableness may include (1) advice, either directly or through publications or writing, as to the value of securities, the advisability of investing in, purchasing or selling securities, and the availability of securities or purchasers or sellers of securities; (2) analysis and reports concerning issuers, industries, securities, economic factors and trends, portfolio strategy, and the performance of accounts; or (3) effecting securities transactions and performing functions incidental thereto. Such research furnished by broker-dealers may be used to service any or all of Wealthrise's clients and may be used in connection with accounts other than those that pay commissions to the broker-dealers providing the research. In particular, third-party research provided by broker-dealers may be used to benefit all of the firm's clients. This creates a conflict of interest in that the firm has an incentive to select or recommend a broker-dealer based on its interest in receiving the research or other products or services, rather than on the clients' interest in receiving the most favorable execution.

Benefits received may be used as soft dollars provided that:

- The service is primarily for the benefit of Wealthrise's clients
- The commission rates are competitive with rates charged by comparable broker-dealers; and
- Wealthrise does not guarantee a minimum amount of commissions to any broker-dealer.

Wealthrise does not receive client referrals from any broker-dealer or third party as a result of the firm selecting or recommending that broker-dealer to clients.

As an investment advisory firm, Wealthrise has a fiduciary duty to seek best execution for client transactions. While best execution is difficult to define and challenging to measure, there is some consensus that it does not solely mean the achievement of the best price on a given transaction. Rather, it appears to be a collective consideration of factors concerning the trade in question. Such factors include the security being traded, the price of the trade, the speed of the execution, apparent conditions in the market, and the specific needs of the client. Wealthrise's primary objectives when placing orders for the purchase and sale of securities for client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the broker. Wealthrise may not necessarily pay the lowest commission or commission equivalent as specific transactions may involve

specialized services on the part of the broker. Wealthrise does not aggregate client orders into block trades. Orders are placed separately for eligible client accounts. As a result, clients may receive different execution prices or execution times, and may not receive potential transaction-cost benefits that could result from aggregation.

Clients may not direct Wealthrise to execute advisory transactions through a broker-dealer that Wealthrise does not support. This limitation may restrict Wealthrise's ability to seek execution through other broker-dealers and may result in costs or execution terms that differ from those available elsewhere.

Wealthrise will not combine orders into block trades. The practice of trade aggregation is not applicable.

Item 13: Review of Accounts

Investment advisory accounts are monitored on a continuous and ongoing basis by Wealthrise's internet-based software systems. The nature of the review is to determine if the client account is still in line with the client's stated objectives. Active strategies are reviewed through automated platform monitoring, predefined algorithms, broker/account data ingestion, market data, model signals, eligibility checks, buying power and position checks, order lifecycle monitoring, broker error handling, and other operational controls. The firm's fully interactive platform is monitored by Nishant Panchal, Founder, CEO and Chief Compliance Officer, to ensure the accuracy of the Wealthrise software and that it continues to perform as designed.

The client is encouraged to update their profile if changes occur in their personal financial situation that might materially affect the investment plan.

The client will receive written statements no less than quarterly from the custodian. In addition, the client will receive other supporting reports from asset managers, trust companies or other custodians, broker-dealers, and others who are involved with client accounts. Wealthrise does not deliver separate client reports but will deliver quarterly fee invoices. Clients are urged to compare the account statements they receive from the qualified custodian with the invoices they receive from Wealthrise. Any discrepancies should be immediately brought to the firm's attention.

Item 14: Client Referrals and Other Compensation

Wealthrise is not compensated by anyone for providing investment advice or other advisory services except as previously disclosed in this Brochure.

Wealthrise does not directly or indirectly compensate any person who is not a supervised person for client referrals.

Item 15: Custody

Wealthrise does not take or accept physical custody of client funds or securities, but is deemed to have constructive custody of client funds by virtue of its limited authority to charge the client's credit card to pay the advisory fees (please see Item 5 Fees and Compensation, above, which describes the safeguards around direct fee deduction). As noted in Item 13 Review of Accounts, above, clients will receive statements not less than quarterly from the qualified custodian and we encourage you to review those statements carefully. Any discrepancies should be immediately brought to the firm's attention.

Item 16: Investment Discretion

Subject to the investment advisory agreement and any accepted client restrictions, Wealthrise has discretionary authority over the full connected brokerage account, including the selection and amount of securities to be bought or sold, without obtaining prior consent for each transaction. The client's Strategy Allocation determines the capital assigned to a Wealthrise strategy and the related advisory and performance fees; it does not limit Wealthrise's discretionary authority under the investment advisory agreement.

Discretionary authority will only be provided upon full disclosure to the client. The granting of such authority will be evidenced by the client's execution of terms and conditions containing all applicable limitations to such authority. All discretionary trades made by Wealthrise will be in accordance with each client's investment objectives and goals. Clients may establish or change their Strategy Allocation through the Wealthrise platform, subject to applicable eligibility rules and effective-date procedures. Before Wealthrise exercises discretion, the client must agree to the firm's terms and conditions and complete the applicable brokerage and API authorizations. Subject to the terms and conditions and any accepted client restrictions, Wealthrise may select, purchase, sell, or hold securities and

determine the amount and timing of transactions without obtaining client pre-approval for each trade. Wealthrise exercises this authority only through supported broker-dealers and within the applicable brokerage and API permissions. Discretionary authority does not permit Wealthrise to withdraw or transfer client cash or securities, or to sell client assets to pay Wealthrise's advisory fees. Clients may submit investment restrictions through the Wealthrise platform; a restriction or change becomes effective when it has been accepted and operationally implemented. A client may revoke discretionary authority or terminate advisory services by written notice to Wealthrise in accordance with the investment advisory agreement.

Item 17: Voting Client Securities

Wealthrise will not vote, nor advise clients how to vote, proxies for securities held in client accounts. The client clearly keeps the authority and responsibility for the voting of these proxies. Also, Wealthrise cannot give any advice or take any action with respect to the voting of these proxies. The client and Wealthrise agree to this by contract. Clients will receive proxy solicitations from their custodian and/or transfer agent.

Item 18 Financial Information

Wealthrise does not require or solicit prepayment of more than $1,200 in fees per client, six months or more in advance, and is not required to file a balance sheet.

Wealthrise has discretionary authority over client accounts and is not aware of any financial condition that will likely impair its ability to meet contractual commitments to clients. If Wealthrise does become aware of any such financial condition, this Brochure will be updated and clients will be notified.

Wealthrise has never been subject to a bankruptcy petition.