

**Item 1      Form ADV Part 2A&B**

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SOFI WEALTH, LLC  
One Letterman Dr., Bldg. A, Suite 4700  
San Francisco, CA 94129  
[855-525-7634](tel:855-525-7634) August 15, 2015

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**This brochure provides information about the qualifications and business practices of SoFi Wealth, LLC (“SW” or the “Firm”). If you have any questions about the contents of this brochure, please contact us at 415.697.2049 or [swilliams@sofi.com](mailto:swilliams@sofi.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority. SW is registered with the SEC as an investment adviser; please note that such registration does not imply a certain level of skill or training.**

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

## Item 2 Material Changes

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In the future, this Item will be updated annually or when material changes occur since the previous release of this brochure. As a newly-registered Investment Adviser, SW initially filed Form ADV in May 2013. The company name has been changed to SoFi Wealth LLC, there are several new members of the staff outlined in Part 2B, and Section 8 has been updated. Under SEC Rules, you will receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our fiscal year, which is in December. We may also provide you with a new Brochure or other ongoing disclosure information about material changes as necessary, without charge.

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## **Item 4 Advisory Business**

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SoFi Wealth, LLC (“SW”) provides an internet based investment advisor registered with the Securities and Exchange Commission (“SEC”). SW provides investment advice to individual investors utilizing their proprietary software along with an experienced investment team to advise clients on general asset allocation for a fee. SW is a wholly owned subsidiary of Social Finance, Inc. (“SoFi”), a Delaware corporation founded in 2011 by a group of Stanford Graduate School of Business students to implement the premise that the student loan industry can be improved by private community solutions.

### **The Services We Provide**

In performing our functions as an investment adviser, we have a fiduciary duty to our clients. We will perform our obligations under each Advisory Agreement with reasonable care and good faith, in a manner consistent with the standard of care exercised by prudent institutional managers of national standing in the United States. That means we will exercise a degree of skill and attention no less than that which we exercise with respect to comparable assets that we manage for ourselves and for others.

In accordance with an Advisory Agreement, the Investment Adviser will manage portfolios and perform certain advisory functions with respect to each portfolio. This includes recommending asset allocation portfolios to investors and providing portfolio rebalancing services.

The Investment Adviser is authorized to, among other things:

- Recommend asset allocation models to investors after evaluating their risk profiles through our online risk-evaluation system. Through a series of questions, SW identifies optimal risk profiles and creates optimal portfolios for our clients, which allows us to manage client risk and return profiles;
- Identify optimal security choices for our clients in order to minimize trading costs and other fees; we continuously evaluate the performance of a range of indices and securities’ to determine if they should replace an asset class or become an additional asset class in our client’s portfolios;
- Determine optimal times for portfolio rebalancing that not only returns the client to the appropriate risk profile but can also be leveraged to minimize trading costs, minimize other fees, and in some cases incorporate tax-loss harvesting in the same process;

- Identify asset classes and equity securities which are optimal considering the specifics of a client's account: for instance, minimizing tax inefficient securities in taxable accounts while maximizing their potential in tax-deferred accounts;
- Perform tax-loss harvesting, where applicable, in order to minimize a client's tax burden for a given year in any taxable account;
- Identify and evaluate the timing and method of disposition or liquidation of investments, select and determine investments to be disposed of or liquidated, and cause an investor to dispose of or liquidate investments in accordance with the terms of the Advisory Agreement in order to facilitate allocation remodeling;
- Engage personnel to assist the Investment Adviser in providing investment advisory services, including, without limitation, counsel, consultants, accountants, investment bankers, financial advisers and sub-investment advisers;
- Open, maintain and close accounts, including custodial accounts, but excluding collection accounts, with banks, including banks located outside the United States, and draw checks or other orders for the payment of monies;
- Incur expenditures as the Investment Adviser determines to be appropriate in furtherance of the purpose of the best interest of investors, and, to the extent that the funds of an investor are available, pay all expenses, debts and obligations;
- Perform such other duties, activities, functions and all other similar things necessary to achieve, implement or facilitate any of the foregoing provisions in the United States as well as foreign jurisdictions.

There is no limitation or restriction on the ability of the Investment Adviser or any of its Affiliates to act as an investment manager (or in a similar role) for other persons. This and other future activities of the Investment Adviser and its Affiliates may give rise to conflicts of interest. See Item 10, below, for how we handle potential conflicts of interest.

### **Termination of our Advisory Agreement**

The Advisory Agreement may be terminated without cause by the Investment Adviser, and the Investment Adviser may resign upon 30 days prior written notice to each investor. In addition, the Advisory Agreement may be terminated by each investor, and the Investment Adviser may be removed upon 30 business days written notice.

### **Wrap Fee Programs**

Assets of SoFi Wealth are managed as part of SoFi Wealth's Wrap Fee Program. A wrap account is a professionally managed investment plan in which all expenses, including brokerage commissions, management fees, and administrative costs, are "wrapped" into a single charge. SoFi Wealth' Wrap Fee Program provides clients investment guidance, portfolio management, and brokerage services for one comprehensive fee based on a percentage of individual account assets. SoFi Wealth may buy or sell securities consistent with analysis designed to seek an investment return suitable to the investment objectives and goals of each distinct client account.

SoFi Wealth determines a suitable course of action by performing a review of each client's individual account and suitability parameters. This review may include type of account, client goals, investment objectives, overall financial condition, income and tax status, personal and business assets, risk tolerance, and other factors unique to the individual client's situation. Based on client suitability parameters, SoFi Wealth will design, revise, and reallocate a client's custom portfolio.

Client accounts are managed on a discretionary basis. SoFi Wealth will contact clients periodically to determine whether their financial situation or investment objectives have changed or if they want to modify their target asset allocation. Clients may modify their target asset allocation at any time through the SoFi Wealth website.

### **Assets Under Management**

SW has not yet begun operations and has no assets under management.

### **Personnel**

#### **John Foley, President**

John has over 30 years of experience creating and marketing financial services.

He worked on the original online trading services at both Schwab and E\*Trade. In the early 1990s he was product manager for TurboTax software, and later returned to Schwab to move the company beyond discount brokerage into advisory services. John was Vice President of Marketing for Finaplex, a developer of investment software, and general manager of Zecco Forex, an online currency trading business. Most recently he was president of Venovate Wealth and Chief Compliance Officer of Venovate Marketplace.

John has an MBA from San Francisco State University and holds Series 7, 24, 63, and 65 licenses. He also serves as the President of SoFi Securities LLC, an affiliate of SW under common ownership and control.

## Scott C. Williams, Chief Compliance Officer

Scott has over 18 years of experience in the financial services industry working in compliance, management, supervision, sales and marketing at Morgan Stanley, Banc America Investments, Citigroup and US Bancorp. Scott is responsible for operations and regulatory compliance for the investment adviser. Scott holds FINRA Series 7, 24, 31, 53, 63 and 65 licenses. Scott also serves as the Chief Compliance Officer of SoFi Securities LLC, an affiliate of SW under common ownership and control.

### Item 5 Fees and Compensation

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SW charges a comprehensive wrap fee at an annual rate based on a percentage of the assets under management (“AUM”) payable quarterly. The AUM will be calculated by SW and will be based on the outstanding aggregate principal balance of each portfolio owned by the investor as of the last day of the preceding calendar quarter. Fees are as follows:

Assets Under Management	Rate	Offer
\$0 - \$100,000	0.35%	Free if you have a SoFi loan
\$100,000 - \$1,000,000	0.25%	0.15% if you have a SoFi loan
Over \$1,000,000	0.15%	

Such management fees are not negotiable, but SW may waive all or part of the fee, permanently or for a period of time, at their sole discretion based on a client’s prior relationship with SW or any affiliate, the amount of AUM, or for any other reason. The above table reflects an initial offer to existing SoFi borrowers.

The Management Fee will be paid quarterly in arrears, based on the value of each account, as of the last day of the previous calendar quarter. If accounts are closed during a calendar quarter, the management fee is calculated on a pro-rata basis for that portion of the quarter prior to closure and charged to the account prior to the transfer of assets out of the account. Although the Management Fee is not refundable, SW may elect to reduce, otherwise modify or waive the Management Fee with respect to any investor.

SW does not receive any sales commissions, 12b-1 fees or other fees from ETFs for investing such funds on behalf of advisory clients. Clients who invested in ETFs may also pay ETF fees in addition to the comprehensive wrap fee. An ETF typically includes embedded expenses that may reduce the fund's net asset value, and therefore directly affect the fund's performance and indirectly affect a Client’s portfolio performance or an index benchmark comparison. Expenses of an ETF may include management fees, custodian fees, brokerage commissions, and legal and accounting fees. ETF expenses may change from time to time at the sole discretion of the ETF issuer.



Neither SW nor any of its Affiliates receive compensation for the sale of securities to SW investors. Some investors in SW may also be clients of SoFi Securities and may purchase securities through them. Some employees of SW may also be employees of SoFi Securities and may receive incentive based compensation on these separate investments outside of the SW wrap program.

At the end of each month, SW's Clearing Broker Dealer will prepare and provide a statement to each investor. The statement will include:

- the net asset value of a portfolio in accordance with generally accepted accounting principles, as applied in the United States as of such time;
- the amount of distributions;
- the securities holdings;
- change in value; and
- the Management Fee, if any.

SW will make these statements available online from their proprietary site, as well as keep client positions, including: shares owned, account value, and transaction history available to the client through the site, which will be updated after the end of each business day.

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

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SW does not engage in Side-by-Side Management or receive any performance based compensation.

#### **Item 7 Types of Clients**

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SW's clients will be individual investors, including individuals, high net-worth individuals, trusts, and estates. The minimum commitment of an Investor in a portfolio will be \$1,000 or the client may invest as little as \$100 per month via ACH transfers, except as approved by the Manager. SW leverages its technology platform in order to allow for smaller client minimums as we rely on our robust risk and portfolio management systems to develop optimal portfolios for our clients.

SW relies heavily on technology to perform investment management services. SW Clients are made aware of the following when utilizing SW's software based IA services:

- Clients of SW agree to rely primarily on the SW website for their account information, including, but not limited to, their positions, profits and losses, account value, account performance, statements, and confirmations. However, quarterly or monthly statements

as well as trade confirmations will be provided electronically to the client by the clearing broker-dealer on the SW website;

- Clients of SW agree that their risk profile is created through our planning system, and this information is used to map clients to their recommended portfolios. All client risk profiling information is confidential. We recommend that clients re-evaluate their risk profile if any of their circumstances have changed in a material way. This will allow SW to quickly recommend a new portfolio, and to establish the client in those new positions;
- Typical investments in the SW wrap program will be ETFs, and SW will focus on ETFs with low expense ratios and high liquidity, while still sufficiently tracking their underlying indices. However, SW is not limited in what it may recommend to its clients, and may offer additional services outside the wrap program that may include positions in individual equity securities, debt securities, futures, foreign exchange, options, and commodities in order to meet client objectives. Client accounts which include products outside of ETFs will be subject to higher supervision, higher fees, and require the client be sufficiently sophisticated to understand and be able to afford the risks of these strategies.

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

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### **Methods of Analysis**

SoFi Wealth uses a goal based planning system and an asset class based strategic asset allocation to create a plan for clients to reach their financial goals. We begin by gathering information about the client. Next we gather information the client's goals and the amounts they intend to invest to reach those goals. We then use target strategic asset allocation to formulate a target portfolio that helps them reach those goals. Finally, we help them implement the plan by creating and managing a portfolio based on the target they selected.

We build the portfolio based using a strategic allocation among asset classes. This analysis includes reviewing historical and expected rates of return, standard deviations, and correlation coefficients between a broad, global range of asset classes. We use mean-variance optimization with a qualitative overlay to create a mix of asset classes that lies on the efficient frontier of asset mixes that maximize expected return at each given level of risk. This method is rooted in the modern portfolio theory work of Harry Markowitz and others.

SW target portfolios typically contain 4-12 ETF securities which track world indices and will allow us to create diversified portfolios for our clients. These portfolios attempt to offer optimum expected returns at the level of expected volatility the client has chosen. SW will adjust portfolios periodically to reflect our analysis of world market conditions. This could result in periods of time where the portfolios are completely in cash.

We feel that in liquid markets prices reflect all available information, so securities reflect the expectations of all market participants and are fairly priced. However, investment strategies can be structured to add value by focusing on asset classes with market premiums that offer investors higher expected returns for their level of risk. This requires careful strategy, diversification, efficient execution, and regular rebalancing to capture desired premiums with low turnover.

Our approach differs from both index investing and active management in several ways:

Active Management:

- Depends on constantly identifying and purchasing undervalued securities
- Relies on forecasting techniques to pick securities and time market low and high points
- Generates higher expenses and trading costs

Index Management:

- Uses index benchmarks, such as the S&P 500, to define investing strategy
- Performance will slightly lag index due to transaction costs
- Index may or may not be part of an asset mix on the efficient frontier of the highest expected returns at a given level of risk

SoFi Approach:

- Believes that, in liquid markets, prices reflect all available information
- Designs mixes of asset classes that attempts to maximize expected return at each level of risk
- Creates a portfolio of passively managed funds to match each asset class mix

The underlying principle of SoFi Wealth is that instead of trying to beat the market, investors should focus on their goals and let the market work for them. We offer a prudent, strategic approach designed to help investors achieve their lifetime financial goals. Our approach offers three benefits over more aggressive approaches:

1. It focuses your investment portfolio on your most important life goals rather than short-term market trends.
2. It is based on academic research.
3. It is a disciplined approach that helps protect against some common behavioral mistakes that can compromise your long-term financial goals.

We believe we offer investor a more sophisticated approach than simple indexing or trying to outguess the market.

SW will recommend one of our five target portfolios based on the client's risk profile and our own analysis of the global market. We will establish our client's risk profile based on their age, income, and other factors, then recommend the target portfolio we feel is the best match for the client to reach his or her goals. Clients may accept our recommendation of the target portfolio or select a different one.

This plan, the target portfolio along with their savings and goals, are subjected to a Monte Carlo Analysis to determine the probability of success. The client may change their goals, contribution level, and the level of risk they wish to take with their investments to improve the probability of success and create a plan that works for them.

Once they have chosen a target portfolio, they open an account, fund it electronically, and we implement their plan by investing in the target portfolio. Portfolios are monitored regularly and periodically rebalanced. This rebalancing may include tax loss harvesting. The management committee may alter the mix of a given target portfolio from time to time, either by altering the percentages of existing ETFs or replacing one or more ETFs in the portfolio.

### Investment Strategies

- Aggressive – designed for investors with a long time frame who are willing and able to bear a significant amount of volatility in the pursuit of faster growth.
- Moderately Aggressive – designed to produce growth with somewhat less variable returns for people who can bear some volatility and need long-term appreciation.
- Moderate – designed to reduce risk, but still providing diversified growth for those approaching retirement.
- Moderately Conservative – designed generate income during the early years of retirement while continuing to preserve purchasing power with a moderate amount of risk.
- Conservative – designed to generate income in the later years of retirement when growth is less of a concern than safety of principal.

The asset allocations in these target portfolios and the specific securities used to implement them may change from time to time. The performance benchmark will be the MSCI World Index.

The portfolios will be managed by our Portfolio Manager, Michael Cagney. Mr. Cagney has over 20 years' experience in financial markets, including managing the assets of institutions and high-net-worth individuals. He is also the Managing Partner of Cabezon Capital, CEO of Social Finance, and former Senior Vice President of Proprietary Trading and Financial Products at Wells Fargo.

Governance will be provided by an investment committee consisting of Michael Cagney, John Foley, Paul Fielding, Vice President and General Manager of SoFi Capital Markets, and Dr. Michael Dooley, Professor of Economics at University of California, Santa Cruz. Corporate oversight and governance is provided by the SoFi Board of Directors and executive management team.

### Risk of Loss

The SW investment program entails risk, including the risk of a total loss of principal. There can be no assurance that the investment objective of the portfolios will be achieved and that investors will not incur losses. When investing in securities, clients may be subject to numerous risks including those that arise as a result of changes in general economic and market conditions, such

as interest rates, availability of credit, inflation rates, and economic uncertainty. While the use of diversified investment vehicles, such as exchange traded funds (ETFs), reduces the risk of investing in individual securities, it cannot completely eliminate this risk. These ETFs invest in individual stocks and bonds that are subject to the risks that include industry conditions, laws, governmental regulation, competition, technological developments, and national and international political circumstance. It is possible that these portfolios will lose money. The shorter the holding period one considers, the greater the probability of a loss over that given holding period.

## **Item 9 Disciplinary Information**

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None.

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

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SW is owned by Social Finance Inc., and affiliated with SoFi Securities LLC, a registered broker-dealer; SoFi Capital Advisors LLC, an exempt reporting investment adviser; and SoFi Lending Corp., a non-bank consumer lending company. None of these affiliates have control over SW and there is no revenue sharing.

Clients of SW, who are accredited investors, may also invest in the private placements of SoFi Lending Corp. or Social Finance Inc. These investments may be made through SoFi Securities LLC. SW does not manage or recommend these investments.

SW does not recommend or select other investment advisers or broker-dealers for clients.

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

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SW has adopted a Code of Ethics expressing its commitment to ethical conduct to comply with applicable securities laws including those relating to employees' personal trading, insider trading and anti-money laundering. SW's Code of Ethics describes the firm's fiduciary duties and responsibilities to clients and sets forth SW's practice of supervising the personal securities transactions of employees. Individuals associated with SW may buy or sell securities for their personal accounts identical to or different from those recommended to clients of the adviser.

To supervise compliance with its Code of Ethics, SW requires that everyone associated with the firm provide securities holding reports and transaction reports at least quarterly to SW's chief

compliance officer. Neither SW nor any of its associated persons has any material financial interest in client transactions beyond the provision of investment advisory services as disclosed in this brochure.

To avoid a conflict of interest between SW and its clients, SW prohibits principal securities transactions between SW and any advisory client without first obtaining the prior written approval of the Chief Compliance Officer and the written consent of the client. SW will also not cross trades between client accounts. SW will provide a complete copy of its Code of Ethics to any client or prospective client upon request.

Affiliates of the Investment Adviser may provide other services to investors and may receive fees from the investors in such capacities. Other present and future activities of the SW and other Affiliates of SW may give rise to additional conflicts of interest. Notwithstanding such potential conflicts, SW understands that it is a fiduciary to the investors and is committed to implement the obligations stated in its Code of Ethics.

## **Item 12      Brokerage Practices**

SoFi Securities, a member of FINRA and SIPC, acts as an introducing broker-dealer in effecting securities transactions for Clients' Accounts in which Apex Clearing provides trade execution and clearing services.

SW seeks the best overall execution of transactions for Client Accounts consistent with its judgment as to the business qualifications of the various brokers through which SW accounts are available. SW obtains information as to the general level of commission rates being charged by the brokerage community from time to time, and will periodically evaluate the overall reasonableness of brokerage commissions paid on Client transactions by reference to such data to ensure competitive commission rates. "Best execution" means the best overall qualitative execution, not necessarily the lowest possible commission cost. Accordingly, the factors that SW considers when selecting or recommending Brokers are matters that directly benefit Client Accounts, and consistent with obtaining the best execution of their transactions. These factors include: execution capability and available liquidity; timing and size of particular orders; commission rates; responsiveness; trading experience; reputation, integrity and fairness in resolving disputes; quality of their application programming interfaces and technology; and other factors.

SW does not engage in any "soft dollar" practices involving the receipt of research or other brokerage service in relation to client commission money, nor do we receive any research or other products in connection with Client transactions. SW also does not use Client commission money to compensate or otherwise reward any brokers for client referrals.

SW may aggregate orders for a Client's Account with orders of other Clients. SW may aggregate securities sale and purchase orders for a Client with similar orders being made contemporaneously for other Client Accounts. In such event, the average price of the securities purchased or sold in such a transaction may be determined and a Client may be charged or credited, as the case may be, the average transaction price. As a result, however, the price may be less favorable to the Client than it would be if similar transactions were not being executed concurrently for other Accounts.

## **Item 13      Review of Accounts**

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Account reviews are performed no less than quarterly by the Chief Compliance Officer and/or other compliance officers. Upon request, SW provides quarterly statements on client accounts that show account balances, account activity and profits (losses) of the accounts. These statements are delivered electronically and are made available through the SW website. Statements may be mailed to clients, at their request, for an additional fee.

SW reviews each Client's Account when it is opened, and continuously monitors and periodically rebalances each Client's portfolio to seek to maintain a Client's targeted risk tolerance and optimal return for the Client's risk level. SW also conducts reviews when material changes may have occurred to a Client's portfolio or investment objectives.

On a quarterly basis, SW contacts each Client to remind them to review and update the profile information they previously provided. SW also requests that Clients reconfirm the same information on an annual basis.

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

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SW does not provide or accept compensation from any person for referrals of investors to its clients, the Funds. SW may receive economic benefits from APEX Clearing, such as revenue from lending securities in client accounts. There is no direct link between this revenue and the investment advice it gives to its Clients. APEX Clearing may also have paid for business consulting and professional services received by SW's related persons. Some of the products and services made available by APEX Clearing through the program may benefit SW but may not benefit its Client accounts. These products or services may assist SW in managing and administering Client accounts, including accounts not maintained at APEX Clearing.

Other services made available by APEX Clearing are intended to help Advisor manage and further develop its business enterprise. The benefits received by Advisor or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to APEX Clearing. As part of its fiduciary duties to clients, Advisor endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by Advisor or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the Advisor's choice of APEX Clearing for custody and brokerage services.

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#### **Item 15      Custody**

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SW does not maintain custody of any client funds or securities. SW provides instructions to SoFi Securities regarding the investment of the Client's assets. Advisory client assets are generally held by APEX Clearing, a member of FINRA and SIPC. APEX Clearing electronically sends monthly or quarterly brokerage and custodial statements directly to clients on an ongoing basis along with electronic transaction confirmations. These statements and confirmations may be delivered via mail for an additional fee at the client's request. These statements should be carefully reviewed by clients. SW encourages its clients to carefully compare reports and data provided by SW on its website to custodial and brokerage statements issued by APEX Clearing or other custodians.



**Item 16      Investment Discretion**

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The portfolios are managed on a discretionary basis. Investors approve recommended portfolios but do not approve rebalancing and asset allocation executions. SW requires that an Account Agreement be completed by a Client who decides to retain SW as their investment advisor. Under the terms of the Account Agreement, SW assumes full discretionary trading and investment authority over the Client's assets held with the Broker and Apex Clearing.

**Item 17      Voting Client Securities**

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SW does not vote on proxy statements issued by the securities held in client portfolios. Proxies will be forwarded directly to client's mailing addresses by Apex Clearing.

**Item 18      Financial Information**

This Item is not applicable because SW does not require or solicit the prepayment of any advisory fees, and does not have any adverse financial condition that is reasonably likely to impair our ability to continuously meet our contractual commitments to our clients.

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**Item 19      Requirements for State-Registered Advisers**

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N/A.

## Item 1 ADV Part 2B

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August 15, 2015

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**This brochure supplement provides information about John Foley - President of SoFi Wealth (SW), and Scott Williams, Chief Compliance officer of SoFi Wealth, which supplements the SoFi Wealth LLC brochure. You should have received a copy of that brochure. If you have not received that brochure or have any questions about the contents of this brochure, please contact us at 415.697.2049 or [swilliams@sofi.com](mailto:swilliams@sofi.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority. SW is registered with the SEC as an investment adviser; please note that such registration does not imply a certain level of skill or training.**

**Additional information about Scott Williams and John Foley is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by a unique identifying number known as a CRD number. The CRD number for SW is 167958. The CRD number for John Foley is 1060265. The CRD number for Scott Williams is 2889617.**

August 15, 2015

# SOFI WEALTH, LLC

## Item 2 Educational Background and Business Experience

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### John Foley

- A. Year of birth: 1955
- B. Education: Mr. Foley received a BA from the University of Scranton in 1977, and an MBA from San Francisco State University in 1984. He currently holds FINRA Series 7, 24, 63, and 65 licenses.
- C. Business Experience:
- John Foley is currently the President of SoFi Wealth LLC and SoFi Securities LLC.
  - He was President of Venovate Wealth LLC from March of 2014 through March of 2015 and Chief Compliance Officer of Venovate Marketplace from September of 2014 through March of 2015.
  - Mr. Foley has been a Technology and Marketing consultant to the Financial Services industry since March of 1996. His clients have included Financial Engines – the leading advisor of 401(k) accounts, GoodApril – a tax advice startup recently acquired by Intuit, Charles Schwab, and Zecco.
  - January to December, 2012 - Director of Forex and Advisory Services for Zecco. He held FINRA Series 3, and 65 licenses.
  - September of 2007 to April of 2008 - Director of Marketing for WrapManager Investment Wealth. From February through April of 2008 he also was a registered advisor rep with both WrapManager and Prospera Securities, their broker-dealer. He held a FINRA Series 7 license.
  - April of 2005 to August of 2007 - Vice President of Marketing at Finaplex, a provider of enterprise software solutions to the investment advisory industry.
  - July of 1999 to November of 2004 - Managing Director of Technical Product Development for Charles Schwab, where he created investment advisory software for both advisors and the web. He held FINRA Series 7, and 66 licenses.
  - March of 1992 to April of 1996 - Senior Product Manager for TurboTax software at Intuit.
  - March of 1991 to February of 1992 - Vice President of Product Management at Reality Technologies, a developer of personal financial planning software.
  - October of 1989 to February of 1991- general manager of Quick and Reilly's online stock trading business. He held FINRA Series 7, 8, and 63 licenses.
  - November of 1986 to September of 1989 - Director of Online Trading at Charles Schwab, managing Schwab's first online trading service. He held FINRA Series 7, 63, and 24 licenses.
  - February of 1984 to October of 1986 - Manager of Broker Services at Trade\*Plus, the firm that became E\*Trade. Mr. Foley ran their original brokerage business. He held FINRA Series 7, 63, and 24 licenses.

August 15, 2015

**Scott Williams**

- A. Year of birth: 1959
- B. Mr. Williams has a B.A. in Journalism and English from California State University. He currently holds FINRA Series 7, 24, 31, 53, 63 and 66 licenses.
- C. Business Experience: Mr. Williams has over 18 years of experience in the securities industry in compliance, management, supervision, sales and marketing. He began his career as a registered representative for Dean Witter Reynolds, then went on to work in various roles with Morgan Stanley, Citigroup, Banc America and US Bancorp. Before joining SoFi, Mr. Williams was President and Chief Compliance Officer for College Rocket, a start-up broker dealer helping future students save for college costs.

**Item 3 Disciplinary Information**

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Neither Mr. Foley, Mr. Williams, nor SoFi Wealth, LLC have had any legal or disciplinary events.

**Item 4 Other Business Activities**

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Mr. Foley is an officer and board member of Folio Books, an independent bookstore operated by his wife.

Mr. Williams is Director of Licensing and Registration for SoFi Lending Corp.

**Item 5 Additional Compensation**

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Mr. Foley and Mr. Williams have employee stock options in Social Finance, Inc., the parent company of SoFi Wealth. The value of these options will be impacted, positively and negatively, by the performance of the other business units of Social Finance, Inc.

**Item 6 Supervision**

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Scott Williams will supervise SW's investment adviser representatives. John Foley will supervise Scott Williams. Neither Mr. Foley nor Mr. Williams will be producing managers. Mr. Foley is responsible for supervising all employees of SW. He reports to the board and

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**August 15, 2015**

executive management of Social Finance Inc.

**Item 7 Requirements for State-Registered Advisers**

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N/A.