

Item 1 – Cover Page

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This Brochure provides information about the qualifications and business practices of Vested Interest, Co. ("Vested Interest"). If you have any questions about the contents of this Brochure, please contact us at the number above. 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.

Vested Interest is a Registered Investment Adviser. Registration of an Investment Adviser does not imply any level of skill or training. This Brochure is intended, in part, to provide information which can be used to make a determination to hire or retain an Adviser.

Additional information about Vested Interest also is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Material Changes

We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge. This Brochure may be requested by contacting us at the numbers above.

Additional information about Vested Interest is also available via the SEC’s web site www.adviserinfo.sec.gov. The SEC’s web site provides information about any persons affiliated with Vested Interest who are registered, or are required to be registered, as investment adviser representatives of Vested Interest.

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Item 4 – Advisory Business

Jane Barratt and Peter Zdanowicz are the principal owners of Vested Interest Co. (“Vested Interest”). Vested Interest Co. was incorporated in August 2013.

Vested Interest provides advisory services, based on individual needs. The firm will develop a personal investment policy based upon a completed client questionnaire and make recommendations according to the established criteria. Vested Interest promotes a buy and hold strategy. Vested Interest will provide monitoring of client accounts, and will inform clients of changes in recommendations.

Vested Interest aims to empower its clients to guide their own investment decisions. The company believes that clients will make better investment decisions if they are already familiar with the companies they are investing in. To this end Vested Interest uses its client credit card history as a base from which to recommend investment options.

Filters and an algorithm are applied to each of the public companies where clients spend their money. These will determine whether these companies are good investment opportunities. This review includes an algorithm that measures a company's financial health, market sentiment towards these companies and aggregated spending and trading trends. The companies that pass the test are presented back to clients as a personal portfolio of ranked stocks.

Portfolio risk is addressed by incorporating low fee index Exchange Traded Funds (ETFs) into personal portfolios. The balance of stock to ETFs is determined through a risk profile generated from a client's completed questionnaire.

When clients create their Vested Interest account, the system requires clients to enter their bank account identification and passwords. This information is not collected by the Vested Interest systems, but is encrypted and routed between Vested Interest's web site and the client's bank using authentication tokens and secured connections. The client selects which accounts will be assessed and the bank sends a transaction history for those accounts. Vested Interest stores and updates this transaction data. None of the transaction data has any personally identifiable information, and Vested Interest is never in possession of a client's actual bank access information and has no way to directly access clients' bank or credit card accounts.

In order to pay fees, Vested Interest requires clients to submit credit card information. This information is not collected by the Vested Interest systems. It is encrypted and routed to the client's bank using secured connections and authentication tokens. Vested Interest is never in possession of a client's credit card number and has no way to directly access clients' credit card account.

In order to open a brokerage account through our preferred trading partner, Vested interest requires clients to submit personal information to our partner so that their identities can be verified and compliance requirements can be completed. Although this process is hosted on Vested Interest's web site, all of the information entered during brokerage registration is sent securely to our brokerage partner and is never stored on the Vested Interests servers or databases. The only information that shared between our brokerage partner and Vested Interest is a client ID and the portfolio transactions and holdings for that client.

Vested interest does not collect any other non-public personal information beyond information submitted by the user at account sign up and during trading activities with our brokerage partner.

Vested Interest does not manage client assets and clients may not impose restrictions as to investing in certain securities or types of securities. However, it is the client's decision whether or not to act on any recommendation provided. Vested Interest does not buy or sell securities on behalf of the client. The client is solely responsible for implementing such advice and placing all buy and sell transactions.

Vested Interest does not offer a wrap fee program. Vested Interest's fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses, which shall be incurred by the client. Vested Interest may incur certain charges imposed by custodians, brokers, third party investment and other third parties such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Exchange traded funds also charge internal management fees, which are disclosed in the fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to Vested Interest's fee, and Vested Interest shall not receive any portion of these commissions, fees, and costs.

Item 5 – Fees and Compensation

Vested Interest is compensated based on an annual fixed fee from clients and by a referral fee from its brokerage partner.

Vested Interest offers a stock recommendation service based on a client's spending history. The company continues to monitor both its client's spending pattern and the performance of recommended stocks, and updates its recommendations based on changes to this information. For this service, Vested Interest will charge an annual fee of \$50 charged in advance. Fees will be charged to a client's credit card. Initial fees or annual renewal fees will be fully refunded, provided a request is submitted to customer service within 30 days of payment.

The annual fixed fee does not cover transaction fees or brokerage fees. But in order for clients to implement their recommended portfolios, Vested Interest's preferred broker will not charge fees for two months from the date of account opening, allowing clients to build a portfolio without incurring fees. After two months, the recommended broker and the custodian of the account will begin charging fees. Typically clients will be charged separately for each buy and each sell transaction. The annual fixed fee and transaction charges do not cover charges imposed by third-parties for investments held in the account, such as contingent deferred sales charges or 12(b)-1 trails on mutual funds. In addition, each mutual fund charges asset management fees, which are in addition to the fees charged by Vested Interest. The annual fixed fee also does not cover any other fees and charges in connection with maintenance of your brokerage account, such as: debit balances; margin interest; odd-lot differentials; IRA fees; transfer taxes; exchange fees; wire transfers; extensions; non-sufficient funds; mailgrams; legal transfers; bank wires; postage; costs associated with exchanging foreign currencies; and SEC fees or other fees or taxes required by law. For more information regarding brokerage practices, please see Item 12 of this Brochure.

Clients have the option to purchase investment products that we recommend through other brokers or agents that are not affiliated with Vested Interest.

Account Termination

The client and/or the firm may terminate the contract at any time by sending written notice. A full refund will be provided without penalty if the client terminates the contract within 5 business days of signing with the firm. For the purposes of this provision, a contract is considered entered into when all parties to the contract have signed the contract.

Upon written receipt of notice to terminate its Client Agreement and unless specific transfer instructions are received, Vested Interest and its agent will cease advisory services.

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

Vested Interest does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

Item 7 – Types of Clients

Vested Interest provides portfolio management services to individuals, high net worth individuals, trusts, and corporations. Vested Interest does not have a minimum account size.

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

The Vested Interest investment strategy begins with an understanding of a client's financial goals. Every client must complete a questionnaire to determine his or her risk profile. Vested Interest filters for clients who have banked savings, who are at the beginning of their investment journey and who have a tolerance for risk.

Advisors use demographic and financial information provided by the client to assess the client's risk profile and investment objectives in determining an appropriate plan for the client's assets. Investment strategies ordinarily include long or short-term purchases of individual stocks, preferred stocks and Exchange Traded Funds (ETFs).

Investment recommendations are based on an analysis of the client's individual needs, and are drawn from an algorithm used to examine information input by the client, research and analysis. The algorithm evaluates three inputs: financial strength, consumer sentiment and a community evaluation. The financial assessment will include the following:

- Fundamental analysis: We attempt to measure the intrinsic value of a security by looking at economic and financial factors to determine if the company is underpriced or overpriced. Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock.
- Cyclical analysis: We attempt to identify the industry cycle of a company to determine whether the company is in a market introduction phase, growth phase or maturity phase. Generally projected revenues, growth potential and business risk may fluctuate based on the company's cycle stage.

The consumer sentiment analysis will include proprietary sentiment scores drawn from consumers, market insiders and trendsetters.

Community value scores are aggregated trends drawn from aggregated credit card transactions, internal surveys and from aggregated portfolio holdings.

It is important to note that investing in securities involves certain risks that are borne by the investor. For any risks associated with investment products, please refer to the prospectuses for additional details about these risks. This investment approach constantly keeps the risk of loss in mind. These risks include, but are not limited to:

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

Item 9 – Disciplinary Information

Registered Investment Advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Vested Interest or the integrity of Vested Interest's management. Vested Interest has no information applicable to this Item.

Item 10 – Other Financial Industry Activities and Affiliations

Vested Interest does not have any activities or affiliations applicable to this Item.

Item 11 – Code of Ethics

Vested Interest has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at Vested Interest must acknowledge the terms of the Code of Ethics annually, or as amended.

Advisors of Vested Interest may buy or sell securities that are recommended to clients. Vested Interest's employees and persons associated with Vested Interest are required to follow the Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors and employees of Vested Interest and its affiliates may trade for their own accounts in securities which are recommended to and/or purchased for Vested Interest's clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of Vested Interest will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code certain classes of securities have been designated as exempt transactions, based upon a determination that these would not materially interfere with the best interest of Vested Interest's clients. In addition, the Code prevents access persons from participating in short swing profits by requiring access persons to hold positions for a minimum of 30 days. Vested Interest also maintains a restricted list. Securities are added to the restricted list when there is a change in recommendation. Access persons are prohibited from trading any securities added to the restricted list for 1 business day. While we do not have access to clients' purchase and sale transactions, employee trading is continually monitored under the Code of Ethics to reasonably prevent conflicts of interest between Vested Interest and its clients.

Vested Interest's clients or prospective clients may request a copy of the firm's Code of Ethics by contacting Jane Barratt at our main number

Item 12 – Brokerage Practices

Vested Interest recommends the brokerage services of TradeKing Securities LLC ("TradeKing"), which is custodied through Apex Clearing Corporation. TradeKing is a registered broker-dealer that is compensated through brokerage commissions or transaction fees charged for effecting securities transactions. When selecting a custodian to recommend, a number of factors were considered, including their historical relationship with Vested Interest, financial strength, reputation, execution capabilities, pricing and services offered. Vested Interest is not affiliated with TradeKing or any other broker-dealer.

Vested Interest receives a fee for referring clients to TradeKing to open an account. As a result, we have an incentive to refer clients to TradeKing. In addition, we have negotiated commission rates to benefit clients. Clients who open an account will have transaction fees waived by TradeKing for the first two months the account is opened. Thereafter, commissions will be charged at a rate of \$4.95 per trade. Vested Interest is not affiliated with TradeKing, and clients are urged to review and understand all related charges and fees which will be disclosed separately by TradeKing.

Clients are permitted to direct brokerage and select their own broker-dealer to custody assets and execute trades. In this case, the client will negotiate the terms and

arrangements with your broker-dealer of choice. Vested Interest may be unable to achieve most favorable execution of client transactions. Directing brokerage may cost clients more money as the client may receive less favorable prices. Clients should carefully review all costs associated with a broker-dealer before opening an account. Vested Interest's fee is the same, regardless of the broker-dealer selected.

Many investment advisers receive products and services from broker-dealers based on the volume of brokerage transactions placed with the broker-dealer. These products and services are known as "soft dollar benefits." We do not receive soft dollar benefits in return for placing trades with particular broker-dealers.

Item 13 – Review of Accounts

Vested Interest's recommendations are based, in part, by the client's spending habits as reported through credit card information provided by the client. A review of information can be initiated by the client by visiting the Vested Interest web site. Client accounts are not reviewed by Vested Interest.

The company updates its equity rankings weekly. Clients will be informed when the equity ratings of stocks that they hold in their portfolios have changed significantly. These triggers are initiated either when the financial fundamentals of a company move significantly from their historical mean, or when future value, as measured by our algorithm, change significantly from their historical mean. The client will be notified via email when a triggering event is reached.

Item 14 – Client Referrals and Other Compensation

Vested Interest receives a fee for referring clients to TradeKing to open an account. As a result, we have an incentive to refer clients to TradeKing. Clients are under no obligation to select TradeKing as their broker-dealer, and are free to open an account and enter transactions through their broker-dealer of choice. Vested Interest's fee is the same, regardless of the broker-dealer selected. Vested Interest does not compensate for client referrals.

Item 15 – Custody

Clients should receive statements at least quarterly from the qualified custodian that holds and maintains your investment assets. Vested Interest urges you to carefully review such statements

Item 16 – Investment Discretion

Vested Interest offers advisory services on a non-discretionary basis. The client is solely responsible for implementing such advice and placing all buy and sell transactions.

Item 17 – Voting Client Securities

As a matter of firm policy and practice, Vested Interest does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in their portfolios. Clients will receive their proxies or other solicitations directly from the custodian or transfer agent. Clients should contact their Advisor if they have any questions or to obtain this information.

Item 18 – Financial Information

Registered Investment Advisers are required in this Item to provide you with certain financial information or disclosures about Vested Interest's financial condition. Vested

Interest has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

Item 19 – Requirements for State-Registered Advisers

Jane Barratt serves as CEO and Founder of Vested Interest. The following describes her formal education and business background.

Education Background

Bond University – Bachelor of Commerce, Marketing

Business Background

Firm	Position	Date
Vested Interest Co.	Partner/Advisor	8/2013 – Present
McGarry Bowen	Chief Operating Officer – International	6/2012 – 10/2013
Rumble LLC	Owner	7/2011 – 6/2012
Y&R New York	President	4/2010 – 7/2011
Sapient Interactive	Vice President, Managing Director	5/2008 – 4/2010

Ms. Barratt is not compensated with performance based fees. There are no disciplinary proceedings against Ms. Barratt that would require disclosure.

Peter Zdanowicz serves as the firm's Chief Operations Officer and Chief Compliance Officer of Vested Interest. The following describes his formal education and business background.

Education Background

Capilano University – Post Baccalaureate, Asia Pacific Business Management

The University of Western Ontario – BA, Political Science

Business Background

Firm	Position	Date
Vested Interest Co.	COO/CCO	8/2013 – Present
Downing Street Cooperative Preschool	Treasurer	5/2010 – 7/2013
Eastern Summerhill Trading	Founder & CEO	1/2003 – 2/2011

Mr. Zdanowicz is not compensated with performance based fees. There are no disciplinary proceedings against Mr. Zdanowicz that would require disclosure.

Neither the Firm or its management persons have any relationship or arrangement with any issuer of securities.