

**Item 1      ADV Part 2A Cover Page**

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San Francisco, CA 94129  
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June 7<sup>th</sup>, 2018

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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 (855) 525-7634 or [advisor@sofiwealth.com](mailto:advisor@sofiwealth.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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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.

Since filing the last Annual Amendment to this Brochure in April 2018, we have made the following material changes.

- Item 14 was updated to disclose the payment of referral fees to affiliate marketing companies.

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## Item 4 Advisory Business

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SoFi Wealth, LLC (“SW”) is an internet based (or “online”) investment advisor registered with the Securities and Exchange Commission (“SEC”). SW provides investment advice to individual investors utilizing 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 advisor, 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.

### **Financial Planning Services**

SW offers financial planning services, which involve preparing written financial plans covering specific or multiple topics. We provide full written financial plans, which typically address the following topics:

- Retirement Planning,
- Insurance Planning,
- College Funding,
- Estate Planning,
- Asset Allocation,
- Tax Reduction Strategies, and
- Investment Planning.

When providing financial planning services, the role of SW is to find ways to help you understand your overall financial situation and help you set financial objectives. We also provide modular written financial plans which only cover those specific areas of concern mutually agreed upon by you and us. A modular written financial plan is limited or segmented and does not involve the creation of a full written financial plan. You should be aware that there are important issues that may not be taken into consideration when your investment adviser representative develops his or her analysis and recommendations under a modular written financial plan.

Written financial plans prepared by us do not include specific recommendations of individual securities.

Our financial planning services do not involve implementing any transaction on your behalf or the active and ongoing monitoring or management of your investments or accounts. You have the sole responsibility for determining whether to implement our financial planning recommendations.

### **Asset Management Services**

In accordance with an Advisory Agreement, SW 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.

SW is authorized to, among other things:

- Recommend asset allocation models to investors after evaluating their risk profiles through our online risk-evaluation system, also referred to as the Goals, Risk and Objectives Exercise. Through a series of questions, SW reasonably identifies appropriate risk profiles and creates portfolios for our clients, which allow us to manage client risk;
- 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 we should replace an asset class or implement an additional asset class in our client's portfolios;
- Determine optimal times for portfolio rebalancing that not only return the client to the target risk profile but can also minimize trading costs, minimize other fees, and in some cases, incorporate tax-loss harvesting in the same process;
- Identify asset classes and securities which are appropriate 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. The election of a non-qualified or qualified account will result in different allocations and underlying holdings, but models with a risk tolerance band will have similar target risk and return characteristics;
- Perform tax-loss harvesting, where applicable, in order to reduce 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 Advisor in providing investment advisory services, including, without limitation, counsel, consultants, accountants, investment bankers, financial advisors and sub-investment advisors;
- 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 Advisor 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 Advisor 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 Advisor 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 by either party at any time, and without cause, in accordance with the applicable Advisory Agreement. SW will promptly liquidate Client's holdings and, upon settlement, disperse the proceeds per the investor's instructions. Upon termination of any account any earned, unpaid fees will be due and payable in accordance with the applicable Advisory Agreement.

### **Wrap Fee Programs**

Assets of SoFi Wealth are managed as part of SoFi Wealth's Wrap Program. A wrap account is a professionally managed investment plan in which expenses, including brokerage commissions, management fees, and administrative costs, are "wrapped" into a single charge. SoFi Wealth's Wrap Program provides clients with 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 the data entered by the client in establishing the account, also referred to as the Goals, Risk and Objectives Exercise. 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. See Item 16 for more details. Clients are responsible for providing any changes to their financial situation or investment objectives by updating their responses on our interactive website. 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.

Clients must appoint our firm as their investment adviser of record on specified accounts (collectively, the "Account"). The Account consists only of separate account(s) held by qualified custodian(s) under the client's name. The qualified custodian maintains physical custody of all funds and securities of the Account, and the client retains all rights of ownership (e.g., right to withdraw securities or cash, exercise or delegate proxy voting and receive transaction confirmations) of the Account. Please see Item 12 for more information.

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

Conflicts may arise in the allocation of investment opportunities among accounts that we manage. We strive to allocate investment opportunities believed to be appropriate for your account(s) and other accounts advised by our firm among such accounts equitably and consistent with the best interests of all accounts involved. However, there can be no assurance that a particular investment opportunity that comes to our attention will be allocated in any particular

manner. If we obtain material, non-public information about a security or its issuer that we may not lawfully use or disclose, we have absolutely no obligation to disclose the information to any client or use it for any client's benefit.

### **Assets Under Management**

SW has \$43,461,313 under management as of January 22, 2018.

### **Ownership**

SoFi is owned through intermediate subsidiaries by SoftBank Group Corporation ("SoftBank"), a publicly held company. SoftBank is a Japanese multinational telecommunications corporation headquartered in Tokyo, Japan.

## **Item 5 Fees and Compensation**

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SW charges a percentage of assets under management in the form of "basis points", or hundreds of one percent, as a management fee, which is disclosed in the Fees disclosure on our website. The annual fee is generally calculated as follows:

Accounts valued under \$10,000 – no SoFi management fee is charged

Accounts valued \$10,000 or over - 25 basis points (or 0.25%)

This fee may change from time to time and is charged quarterly in arrears.

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 management fee may be waived for clients who have borrowed money from an affiliate, such as SoFi Lending Corp, for the duration of the client's loan. Although the Management Fee is not refundable, SW may elect to reduce, otherwise modify or waive the Management Fee with respect to any investor.

The Management Fee will be paid quarterly in arrears, for any month or part thereof in which the client is in the SW program. The fee is calculated as an Average Daily Balance ("ADB") of the subject account during the respective billing period. This methodology adds the ending daily value of the account for each day in the billing period and subsequently divides this sum by the number of days in the period, otherwise known as an "arithmetic average". The management fee is multiplied the Average Daily Balance to determine the fee due by the client. SW will rely on valuation data provided by a third-party service provider to compute the end of day values. Fees will be pro-rated for the number of days the account is funded (opened or closed). Accounts of the same household are not aggregated to meet the \$10,000 threshold.

SW may also receive revenue from lending client securities under the terms of the Master Securities Lending Agreement. This revenue is not shared with the client. It is used to reduce management fees. See the Fully Paid Lending Disclosures for additional information.

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 SW management 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.

Investors may be charged incidental fees for certain services provided by our clearing firm such as IRA administration, sending money or securities to another firm via ACAT, or sending paper

statements or confirms (electronically delivered documents are free). These fees may change from time to time and are listed under our Fees link on the SW website.

The single, all-inclusive fee for portfolio management, brokerage, custodial and recordkeeping services may cost the client more or less than the cost of purchasing these services separately. The primary factor affecting the comprehensive fee is the provision by SW of individualized investment advice and portfolio management services tailored to needs of each individual. SoFi Securities, LLC, an affiliate of the Firm, marks up these charges under certain circumstances to cover costs associated with the administration of such fees.

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 during which an account had activity, but not less than quarterly, SW's Clearing Broker Dealer, Apex Clearing, 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.

SW does not charge a separate fixed fee or hourly fee for Financial Planning Services. They are provided complimentary as part of the overall services offered to our clients.

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### **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.

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### **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 \$500 or the client may invest as little as \$100 per month via ACH transfers, except as approved by the Manager. Account and ACH minimums may be waived as the election of the Firm. SW leverages its technology platform in order to allow for smaller client minimums as we rely on our 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 via this disclosure document:



- 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 profiling 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 Goals, Risk and Objectives Exercise 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 about the client's goals and the amounts they intend to invest to reach those goals. We then use target-specific strategic asset allocation to formulate an investment strategy 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. Algorithms are utilized to assess the risk tolerance of a client and to recommend an asset allocation.

SW investment strategies typically contain 4-12 ETF securities, which track world indices and will allow us to create diversified portfolios for our clients. These strategies attempt to offer optimum expected returns given the risk tolerance, time horizon, and objectives of each strategy. 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 or cash equivalents. There are many ways to build a portfolio of stocks and bonds. Most approaches fall into one of two categories: passive or active. Passive investing picks a benchmark index and mirrors it. An ETF tracking the S&P 500 Index is an example. Active involves making decisions that differ from the benchmark index. A mutual fund benchmarked to the MSCI World Index that picks what it thinks are the best stocks from anywhere in the world, or one that might overweight Europe at the expense of Japan, are examples of active investing.

SoFi Wealth employs the active management of passive assets. We actively curate a portfolio of passively managed index ETFs. First, we assemble a universe of liquid global stock and bond

indices, and measure both their historical volatility (variance), and how each moves relative to the others (covariance). Then we add our future return assumptions, broken out by dividends, coupons, and price appreciation, as each has potentially different tax treatment.

Potential Asset Classes Include:

**Stocks:**

U.S. Stocks  
Developed Markets ex-US Stocks  
Emerging Markets Stocks  
U.S. Energy Stocks  
REITs

**Bonds:**

1-3 Month Treasury Bills  
Inflation Protected Treasuries  
U.S. Treasuries  
Investment Grade Corporate Bonds  
High Yield Corporate Bonds  
Investment Grade Municipal Bonds  
High Yield Municipal Bonds  
Investment Grade Global Government Bonds  
High Yield Global Government Bonds

Our return assumptions are a combination of historical returns, current valuation, and our macroeconomic forecasts. The latter is of particular relevance, as it generally drives the greatest disparity in our strategies versus their respective benchmarks. Macroeconomic forecasts generally involve central banks or government policy and/or the factors that determine domestic and global growth. For example, if Europe is lowering rates while the Fed is raising them, we might expect European stocks to outperform, other things being equal. This will bias our International Stocks return assumptions higher than they might otherwise be.

Once we have our variance, covariance, and return assumptions, we define a discrete exposure level for each strategy—ranging from conservative to aggressive. Using our universe of indices as inputs, we use a mean-variance optimization algorithm to build the highest expected return portfolio for each strategy, constrained to have a tracking error of 3% or less relative to an assigned blended benchmark, which is comprised of the MSCI All Country World Index and the Bloomberg Barclays Global Aggregate Index. Volatility constraints may be employed as well as a risk management technique. The blended benchmarks are chosen for each strategy to meet the approximate expected stock and bond exposure levels of each investment strategy, though these exposure levels may not exactly equal that of the blended benchmark.

Finally, we do one last qualitative overlay in order to avoid excess concentration or prevent ETF holdings that are less than 2%. Extremely small positions add little in the way of diversification or expected return, but can be needlessly costly if they have higher than average expense ratios or add tax complexity. Our Investment Committee drives our decisions, and they publish their work periodically to help provide transparency on our portfolio selections. In our periodic market updates, we explain why we have any biases and what we hope to achieve by using them. We also track whether our bias is adding value to the portfolios. We believe this approach will deliver better returns over the long run than holding the same allocation mix with no adjustments for changing economic conditions.

SW will recommend one of our investment strategies 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 and other factors, then recommend the investment strategy we feel is the best match for the client

to reach his or her goals. Clients may accept our recommended investment strategy or select a different one.

The recommendation of a given investment strategy is heavily dependent on the information provided to SW during the risk profile component of the account opening and during subsequent client update requests, which are transmitted to all clients annually. A client may also log in to their account at any time and provide updated information. If inaccurate information is provided or if a client fails to respond to update requests, the quality and reliability of advice could be materially impacted. There may be certain factors or variables which have not been included in the Goals, Risk and Objectives Exercise, some of the questions are over-generalized, ambiguous or designed to fit a pre-determined option and consequently the output may not be right for all of an client's needs or goals. SW recommends investment strategies based on risk assumptions that are correlated primarily to the age of the investor and does not consider assets or objectives outside of the stated client goal. The limitations of such an algorithm should be considered in the evaluation of services provided by the Firm.

Client contribution plans, the investment strategy 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 an investment strategy, they open an account, fund it electronically, and we implement their plan by investing in the strategy.

Portfolios are rebalanced according to drift-based rules. This rebalancing may include tax loss harvesting. The Investment Committee may alter the mix of a given investment strategy from time to time, either by altering the percentages of existing ETFs or replacing one or more ETFs in the portfolio. The algorithms described prior and/or a zero neutral allocation to cash might rebalance client accounts without regard to market conditions and on a more frequent basis than a client might expect.

### Investment Strategies

- Aggressive – Designed for investors with a long-term time frame, a goal in over 10 years, and who are willing and able to bear a significant amount of volatility in the pursuit of greater potential growth. This strategy typically allocates over 90% to stock funds.
- Moderately Aggressive – Designed for potential long-term growth with somewhat less variable returns for people who don't mind volatility and have a goal in over 10 years. This strategy typically allocates a majority to stock funds. It also allocates a smaller portion to bond funds and bears the interest rate risk inherent in these funds.
- Moderate – Designed to reduce the impact of stock price volatility for investors approaching retirement or with a goal beginning in 5 to 10 years. It is designed to be a more balanced portfolio between stock and bond funds. Bond Funds have interest rate risk and lower potential return than stock funds, but less price volatility as well.
- Moderately Conservative – Designed to generate yield with some exposure to growth assets, during the early years of retirement, or for goals in 3 to 5 years. It has interest rate risk, but lower volatility with the potential to preserve purchasing power. This strategy typically allocates a majority to bond funds and a smaller portion to stock funds.

- Conservative – Designed to generate yield in the later years of retirement or for investors with goals in less than 3 years when growth is less of a concern than preserving purchasing power and capital preservation. This portfolio is usually over 90% bond funds, which have interest rate risk, but less volatility than stock funds.

The asset allocations in these target portfolios and the specific securities used to implement them may change from time to time. SW maintains allocations within qualified accounts that are distinct from non-qualified accounts to account for the tax treatment of such assets. Expected Returns are decomposed into dividend/interest and capital gains. Assumed tax rates, which are applied on an asset specific basis, are applied to each portion in order to get to an approximate after-tax return. Taxable account strategies are optimized using these after-tax returns. SW's tax assumptions are designed to be generally applicable but may not necessarily be appropriate for each individual's circumstances. Nontaxable accounts, however, are optimized under the pretax return and thus results in a different asset allocation than a taxable account of the same risk. The performance benchmark for our investment strategies is a blended benchmark of the MSCI All Country World Index (ACWI) and the Bloomberg Barclays Global Aggregate Index, blended to meet the approximate expected stock and bond exposure levels of each investment strategy, though these exposure levels may not exactly equal that of the blended benchmark.

### **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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There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of our business or integrity.

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

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SW is owned by Social Finance Inc., which is commonly known as SoFi. SoFi was formed to be, what we consider, a new kind of finance company. It is our goal to take a radical approach to lending and wealth management. We strive to develop innovative products and tools for faster service and open conversations. Whether our members are looking to buy a home, save money on student loans, ascend in their careers, or invest in the future, the SoFi community works to empower our members by developing and focusing on the goals they set for financial independence as a result.

Firms affiliated with SW include SoFi Securities LLC, a registered broker-dealer; SoFi Capital Advisors LLC, an exempt reporting investment adviser, SoFi Insurance Agency, LLC, a life insurance marketing company, and SoFi Lending Corp., a non-bank consumer lending company. Additional information about SW's structure and directors is provided on Part 1 of SoFi Wealth's Form ADV which is available online at <http://www.adviserinfo.sec.gov>.

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 advisors for clients.

### **SoFi Lending Corp.**

SoFi Lending Corp. is a non-bank, consumer lending company providing student loan, real estate mortgage services and other personal loan services to the general public.

SW has arrangements with SoFi Lending Corp. that are material to our advisory services. SW was formed to provide an investment management option to SoFi Lending Corp. members (i.e. consumers of SoFi Lending Corp. generated loans). Currently, all SW clients are also SoFi Lending Corp. loan consumers.

As an incentive for a SoFi Lending Corp. member to open a managed account through SW, SW is not charging investment management fees to clients who purchase loans through SoFi Lending Corp.

Although, SW and SoFi Lending Corp. actively cross-solicit services to clients, SoFi Lending Corp. clients are not required or obligated in any way to utilize the investment management services available through SW and can work with any investment professional of their choice.

### **SoFi Securities LLC**

SW is under common ownership with the full-service, introducing broker/dealer, SoFi Securities LLC, used for all SW managed accounts. SoFi Securities LLC is a member of FINRA and SIPC. SW and SoFi Securities LLC share office space, personnel, and resources. Many of the SW advisory personnel are also registered representatives with SoFi Securities LLC. However, SoFi Securities, LLC does not provide commission-based brokerage services to SW clients. All brokerage services provided by SoFi Securities LLC are for the Asset Management Services outlined in Item 4 of this brochure.

Please refer to Item 12 – Brokerage Practices for more information.

### **Social Finance Life Insurance Agency LLC**

SW clients will be marketed and have the ability to purchase insurance products (primarily term-life insurance policies) through Social Finance Life Insurance Agency LLC.

Clients are never obligated or required to purchase insurance products from or through Social Finance Life Insurance Agency LLC and may choose any independent insurance agent and insurance company to purchase insurance products. Regardless of the insurance agent selected, the insurance agent or agency will receive normal commissions from the sale.

## **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 advisor. Transactions in ETFs have been pre-approved for trading by SW's Chief Compliance Officer based on the security's liquidity profile and structural characteristics. Associated persons may also buy or sell specific securities for their own accounts that are not purchased or sold for Clients. SW monitors the securities transactions of all associated persons and investigates any unusual patterns that it detects. 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 Advisor 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**

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Clients are required to utilize the brokerage services of our affiliate, SoFi Securities, a member of FINRA and SIPC, which acts as an introducing broker-dealer (or agent for custody) in effecting securities transactions for Clients' Accounts in which Apex Clearing provides trade execution and clearing services. Apex Clearing is an unaffiliated broker-dealer, member FINRA and SIPC. Not all investment adviser firms require the use of a particular broker/dealer. However, for operational and compliance purposes, we have made the decision to provide all asset management services through one brokerage, custodial platform. Please understand you are not required or obligated to utilize our services and therefore you are not required or obligated to open an account with SoFi Securities and Apex Clearing. However, if you do not want to use SoFi Securities or Apex Clearing, we are unable to provide our asset management 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 receives economic benefits from Apex Clearing, including 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.

SW aggregates 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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Portfolios are monitored regularly using software that tracks portfolio drift from neutral allocations and cash holdings. Drift is managed as a percentage deviation above and below the neutral allocation, known as tolerance band. When a tolerance band is breached or cash exceeds a maximum threshold, the portfolio is rebalanced to neutral. Investment advisory personnel oversee algorithms and respond to identified exceptions, but each client’s account may not be regularly reviewed by such personnel. A client should be aware that SW relies heavily on technology and that limited direct human oversight or intervention occurs in the surveillance of account activity. If account activity does not align with client expectations, they should notify SW immediately. Exception-based 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 not less than annual basis, SW contacts each Client to remind them to review and update the profile information they previously provided.

Portfolio management, investment selection, and ongoing governance will be provided by an investment committee consisting of John Gardner CFA®, General Manager of Wealth, and Ashish Jain, Senior Vice President of Capital Markets. The SoFi Board of Directors and executive management team provide corporate oversight and governance.

### Item 14 Client Referrals and Other Compensation

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SW runs promotional campaigns with various "affiliate marketing" websites to attract Clients to establish advisory relationship. These promotions include benefits such as reduced and/or waived advisory fees, additional advisory services, branded promotional items of nominal value (shirts, hats, etc.), favorable fee arrangements, and/or reduced or waived advisory fees for Clients. In the event a consumer establishes an advisory relationship with SW as result of an invitation presented via an affiliate marketing website, a referral fee is paid to the website operator. A disclosure is provided at the time the potential client is forwarded to a SW branded landing page and is again presented for acknowledgement at the time the advisory relationship is established, which describes the affiliate marketing relationship and discloses the compensation arrangement. Commonly, affiliate marketing websites are paid in the form of so-called CPM, CPC or CPA arrangements (respectively, impressions, clicks or acquisition through other websites). For example, SW advertises on various social media and other websites, including sites on which bloggers may write articles about SW and its products and/or services (as well as the products and services of SW corporate affiliates disclosed in Item 10). SW exercises no editorial control over such sites. These arrangements create an incentive for a third party or other existing Client to refer prospective Clients to SW. Depending on the agreed upon terms with the affiliate marketing website, these arrangements may also create a conflict of interest for a Client to maintain a certain level of assets managed through SW if doing so would result in eligibility to receive an incentive, bonus or additional compensation. Referral and solicitation programs are operated in compliance with the requirements of Rule 206(4)-3 under the Investment Advisers Act of 1940, as amended, to the extent required by applicable law. Additional compensation arrangements are disclosed in Item 5.

### Item 15 Custody

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Custody, as it applies to investment advisors, has been defined by regulators as having access or control over client funds and/or securities. In other words, custody is not limited to physically holding client funds and securities. If an investment adviser has the ability to access or control client funds or securities, the investment adviser is deemed to have custody and must ensure proper procedures are implemented.

SW is deemed to have custody of client funds and securities whenever SW is given the authority to have fees deducted directly from client accounts. However, this is the only form of custody



SW will ever maintain. It should be noted that authorization to trade in client accounts is not deemed by regulators to be custody. SW provides instructions to SoFi Securities regarding the investment of the Client's assets. Advisory client assets are held by Apex Clearing, a member of FINRA and SIPC. SoFi Wealth, LLC electronically sends notifications that monthly or quarterly brokerage and custodial statements produced by Apex Clearing are available on its website 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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When providing asset management services, SW requires discretionary authority over your account. You must designate our discretionary authority in our written client agreement. We will then have the authority to select investments for your account(s) without obtaining your consent for each transaction. Investors can select the recommended investment strategy or a different investment strategy that they choose. If investors select a strategy other than the recommended strategy, an electronic confirmation will be sent to the investor. Investors 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 clients' mailing addresses by Apex Clearing.

### **Item 18 Financial Information**

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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.

ADV Part 2B

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Item 1      Cover Page

SOFI WEALTH, LLC  
One Letterman Dr., Bldg. A, Suite 4700  
San Francisco, CA 94129  
855-525-7634  
June 7<sup>th</sup>, 2018

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**This brochure supplement provides information about our Investment Advisor Representatives, 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 (855) 525-7634 or [advisor@sofiwealth.com](mailto:advisor@sofiwealth.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 our Investment Advisor Representatives is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

June 7<sup>th</sup>, 2018

## SoFi Wealth Form ADV Part 2A&B

### Item 2 Educational Background and Business Experience

#### Jay

Jay Popky, CFP®

Year of birth: 1961

#### Educational Background:

Mr. Popky graduated with a Bachelor of Arts in Liberal Arts from The Pennsylvania State University in 1984. He is a CERTIFIED FINANCIAL PLANNER™ professional.

CERTIFIED FINANCIAL PLANNER™ – Issued by the Certified Financial Planner Board of Standards (202-379-2200, [www.cfp.net](http://www.cfp.net)). The CFP® designation is conveyed to financial professionals who have demonstrated mastery of nearly 100 topics dealing with integrated financial planning. Successful candidates must typically hold a Bachelor's degree, complete required course of study, hold relevant work experience, pass a background check, pass a 10 hour examination and comply with a code of ethics. Continuing Education Requirements - 30 hours every two years.

#### Business Experience:

SoFi Wealth	2018-Present	Financial Planner
Capital One Investing	2015-2018	Financial Advisor
Vanguard	2014-2015	Financial Advisor
Vanguard	2007-2014	Project Manager

#### Disciplinary Information:

Jay has no legal or disciplinary events to report.

#### Other Business Activities:

Jay has no outside business activities to report.

#### Marcus

Marcus Minsky, CFP®

Year of birth: 1987

#### Educational Background:

Mr. Minsky graduated with a Bachelor of Science in Finance from Shippensburg University in 2009. He is a Certified Financial Planner™ Professional.

CERTIFIED FINANCIAL PLANNER™ – Issued by the Certified Financial Planner Board of Standards (202-379-2200, [www.cfp.net](http://www.cfp.net)). The CFP® designation is conveyed to financial professionals who have demonstrated mastery of nearly 100 topics dealing with integrated financial planning. Successful candidates must typically hold a Bachelor's degree, complete required course of study, hold relevant work experience, pass a background check, pass a 10 hour examination and comply with a code of ethics. Continuing Education Requirements - 30 hours every two years.

## SoFi Wealth Form ADV Part 2A&B

### Business Experience:

SoFi Wealth	2018-present	Financial Planner
Capital One Investing	2015-2018	Senior Financial Advisor
Northwestern Mutual	2015-2015	Associate Wealth Management Advisor
PNC	2013-2015	Financial Specialist

### Disciplinary Information:

Marcus has no legal or disciplinary events to report.

### Other Business Activities:

Marcus has no outside business activities to report.

### Chad

Richard Chad Jones

Year of Birth: 1975

### Educational Background:

Mr. Jones graduated from Kern High School in 1993, no formal education after high school.

### Business Experience:

SoFi Wealth	2017-present	Investment Advisor
TD Ameritrade	2013-2017	Senior Ops Rep/Investment Consultant
Wells Fargo	2008-2013	Trader
E*Trade	2006-2008	Financial Representative

### Disciplinary Information:

Chad has no legal or disciplinary events to report

### Other Business Activities:

Chad has no outside business activities to report

### Ken

Ken Madsen

Year of birth: 1988

### Educational Background:

Mr. Madsen graduated from Olympus High School in 2007, no formal education after high school.

### Business Experience:

SoFi Wealth	2017-Present	Investment Advisor
E*TRADE Financial	2016-2017	Active Trading Specialist
	2015-2016	Platinum Service Specialist
	2013-2015	Senior Financial Service Specialist

## SoFi Wealth Form ADV Part 2A&B

University Credit Union      2012-2013      Member Service Representative

### Disciplinary Information:

Ken has no legal or disciplinary events to report.

### Other Business Activities:

Ken has no outside business activities to report.

### Jessica

Jessica Gorham

Year of birth: 1986

### Education Background:

Bachelor of Science in Economics from University of Utah in 2013.

### Business Experience:

SoFi Wealth	2018-present	Investment Advisor
Fidelity Investments	2015-2018	Investment Consultant
	2009-2015	Annuity Sales Representative
	2007-2009	Retirement Specialist

### Disciplinary Information:

Ms. Gorham has no disciplinary history to disclose.

### Other Business Activities:

Ms. Gorham has no outside business activities to report.

### Tyler

Tyler Clark

Year of birth: 1976

### Educational Background:

Mr. Clark graduated with a Master's in Business Administration from Utah State University in 2003.

### Business Experience:

SoFi Wealth	2017 - Present	Financial Planning Manager
TD Ameritrade	2009 - 2016	Investor Education Manager
Investools	2004 - 2009	Investor Education Manager
Investools	2003 - 2004	Investor Education Instructor

### Disciplinary Information:

Tyler has no legal or disciplinary events to report.

### Other Business Activities:

Tyler has no outside business activities to report.

## SoFi Wealth Form ADV Part 2A&B

### Ryan

Ryan Tuttle

Year of birth: 1972

#### Educational Background:

Mr. Tuttle graduated as a Bachelor of Finance from the University of Utah in 2007.

#### Business Experience:

SoFi Wealth	2017 - Present	Financial Planner
TD Ameritrade	2014 - 2017	Senior Financial Consultant
E*Trade	2013 - 2014	Financial Service Representative
Morgan Stanley	2010 - 2013	Wealth Advisor

#### Disciplinary Information:

Ryan has no legal or disciplinary events to report.

#### Other Business Activities:

Ryan has no outside business activities to report.

### Jared

Jared Bolduc

Birth Year: 1983

#### Educational Background::

Currently attending Brigham Young University with an emphasis in Financial Economics.

#### Business Experience:

SoFi Wealth	2017- Present	Financial Planner
InterCap Lending	2016-2017	Mortgage Loan Officer
E*Trade	2016-2016	Financial Consultant
CUSO Financial	2015-2016	Financial Advisor
TD Ameritrade	2014-2015	Investment Consultant
Fidelity Investments	2007-2014	Financial Representative

#### Disciplinary Information:

Jared has no legal or disciplinary events to report.

#### Other Business Activities:

Co-owner of Salt Valley Pomsnies a high end dog breeding company

NMLS # 1529674 for my mortgage license. I also have my Property and Casualty, Life and Health insurance licenses.

### Greg

## SoFi Wealth Form ADV Part 2A&B

Gregory Palmieri, CFP®  
Year of birth: 1982

### Educational Background:

Mr. Palmieri graduated with a Bachelor of Science in Finance from Indiana University of Pennsylvania 2007, a certificate in financial planning from Duquesne University in 2013 and a M.B.A. at George Mason University in 2017. He is a Certified Financial Planner™ Professional.

CERTIFIED FINANCIAL PLANNER™ – Issued by the Certified Financial Planner Board of Standards (202-379-2200, [www.cfp.net](http://www.cfp.net)). The CFP® designation is conveyed to financial professionals who have demonstrated mastery of nearly 100 topics dealing with integrated financial planning. Successful candidates must typically hold a Bachelor's degree, complete required course of study, hold relevant work experience, pass a background check, pass a 10 hour examination and comply with a code of ethics. Continuing Education Requirements - 30 hours every two years.

### Business Experience:

SoFi Wealth	2018-present	Financial Planner
USAA	2014-2017	Wealth Manager
UBS	2011-2014	Financial Advisor

### Disciplinary Information:

Greg has no legal or disciplinary events to report.

### Other Business Activities:

10% owner of Baghdad Country Club- Profit for a purpose company that sells different merchandise while donates a portion of profits to veteran related charities.

### Sean

Sean Hytry  
Year of Birth: 1968

Mr. Hytry graduated with a Bachelors of Business from Westminster College in 1999.

### Business Experience:

SoFi Wealth	2017-present	Investment Advisor
Fidelity Investments	2016-2017	Private Client Group
TD Ameritrade	2013-2016	Team Manager
E*Trade Leader	2006-2013	Platinum Services Stock Options Team

### Disciplinary Information:

Sean has no legal or disciplinary events to report.

### Other Business Activities:

Sean has no outside business activities to report.

## SoFi Wealth Form ADV Part 2A&B

### Ali

Alison Norris, CFP®

Year of birth: 1988

Ms. Norris graduated *cum laude* from Duke University in 2010 with a Bachelor of Arts in Philosophy. In 2014, she received an Executive Certificate in Financial Planning from Georgetown University. She is a CERTIFIED FINANCIAL PLANNER™ Professional.

CERTIFIED FINANCIAL PLANNER™ – Issued by the Certified Financial Planner Board of Standards (202-379-2200, [www.cfp.net](http://www.cfp.net)). The CFP® designation is conveyed to financial professionals who have demonstrated mastery of nearly 100 topics dealing with integrated financial planning. Successful candidates must typically hold a Bachelor's degree, complete required course of study, hold relevant work experience, pass a background check, pass a 10 hour examination and comply with a code of ethics. Continuing Education Requirements - 30 hours every two years.

#### Business Experience:

Alison joined SoFi in 2017. Initially starting as a Financial Planner, she is now SoFi's Advice Strategist.

SoFi Wealth	2017 - Present	Advice Strategist
Provisé Management Group	2016 - 2017	Relationship Manager
Huckleberry Capital Management	2015 - 2016	Lead Financial Planner
Motley Fool Wealth Management	2012 - 2015	Financial Planner

#### Disciplinary Information:

Alison has no legal or disciplinary events to report.

#### Other Business Activities:

Alison has no outside business activities to report.

### Alan

Alan Carlisle

Year of Birth: 1974

Alan Carlisle is the Chief Compliance Officer of SoFi, which includes broad compliance oversight for SoFi Lending Corp, SoFi Mortgage, SoFi Securities, and SoFi Wealth. He is responsible for the administration of the enterprise Compliance Management Program and is a member of the Compliance Committee, Complaints Committee, and Compliance Assurance Subcommittee. A seasoned lending and securities compliance professional with over 20 years of experience, Alan has held several senior executive roles for FINRA and SEC registered firms, as well as served as an advisor to real estate distributors and syndicators. Alan holds the Series 4, 7, 9, 10, 24, 27, 53, 55, 63, 65, 79 and 99 securities licenses and the CRCM, CIPM, CAMS, CCIM and LEED AP BD+C/AP O+M designations.



## SoFi Wealth Form ADV Part 2A&B

Mr. Carlisle holds FINRA Series 4, 7, 9, 24, 27, 53, 55, 63, 65, 79 and 99 licenses and holds the CFA Institute's Certificate in Investment Performance Measurement designation. In 2016, Alan completed a graduate level program in FinTech and Future Commerce at Massachusetts Institute of Technology.

### Business Experience:

SoFi Wealth	2016-present	CCO
FlashFunders	2015-2016	CCO
SCF Securities	2009-2015	CRO
Hanson McClain	2011-2012	'40Act Fund Operations

(See public disclosure information at the FINRA BrokerCheck website for additional background, including registrations associated with wholly-owned consulting firm operated from 1998 to 2008).

### Disciplinary Information:

Sean has no legal or disciplinary events to report.

### Other Business Activities:

Mr. Carlisle participates in real estate transactions as a licensed broker and holds a CA insurance license. He is also an employee of Social Finance, Inc. and serves in compliance roles for SoFi Securities, LLC and SoFi Capital Advisors, LLC. Additionally, he serves as an Industry Arbitrator for cases heard by FINRA Dispute Resolution and currently serves on the FINRA District 1 Committee.

### John

John Gardner

Year of Birth: 1974

John Gardner, CFA, is the General Manager of Wealth at SoFi, where he's responsible for the development for SoFi's investment, insurance and advisory services platforms. Prior to SoFi, John was a Co-founder & CFO of LearnVest, a subscription based financial planning platform acquired by Northwestern Mutual in 2015. He also was a co-founder of Cabezon Investment Group, a Global Macro Hedge fund.

Mr. Gardner graduated with a Bachelor of Science in Finance and Marketing from Lehigh University and is a Chartered Financial Analyst®.

### Business Experience:

SoFi Wealth	2016-present	General Manager
LearnVest	2009-2016	CFO
Cabezon	2005-2009	COO
Finaplex	2003-2005	Director

### Disciplinary Information:

John has no legal or disciplinary events to report.

## SoFi Wealth Form ADV Part 2A&B

### Other Business Activities:

John has no outside business activities to report.

### Blake

Blake Watts

Year of Birth: 1986

Blake Watts is a Compliance Officer at SoFi with over 7 years of experience in financial services. Blake assists with the overall compliance oversight of SoFi Wealth, and SoFi Securities.

Mr. Watts holds FINRA series 7, and 66.

### Business Experience:

SoFi Wealth	2016-present	Investment Advisor/Compliance Officer
JP Morgan	2011-2016	Investment Advisor/Branch Manager

### Disciplinary Information:

Blake has no legal or disciplinary events to report.

### Other Business Activities:

Blake has no outside business activities to report.

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### Supervision

Alan Carlisle is the Chief Compliance Officer of SoFi Wealth, LLC. He is responsible for developing, overseeing and enforcing the firm's compliance programs that have been established to monitor and supervise the activities and services provided by the firm and its representatives. Alan Carlisle can be contacted at 415-481-0740. Mr. Carlisle is not a producing manager.