

Item 1 Cover Page

Wefea Capital LLC
Firm CRD #:299615

Form ADV Part 2A – Disclosure Brochure

Effective: December 17, 2018

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This brochure provides information about the qualifications and business practices of Wefea Capital LLC. If you have any questions about the contents of this brochure, please contact us at (925) 218-1839.

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Registration as a registered investment advisor does not imply a certain level of skill or training.

Additional information about Wefea Capital LLC, CRD #299615 also is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Material Changes

Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about advisory personnel of Wefea Capital LLC.

Wefea Capital LLC believes that communication and transparency are the foundation of its relationship with clients and will continually strive to provide its clients with complete and accurate information at all times. Wefea Capital LLC encourages all current and prospective clients to read this Disclosure Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback.

Initial Filing

Wefea Capital LLC is a new Registered Investment Advisor.

Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of Wefea Capital LLC.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

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Item 4 Advisory Business

A. Description of Advisor Firm.

Wefea Capital LLC is formed as a limited liability company in the state of Delaware as of November 6, 2018 and is registered as an investment advisor with the Securities and Exchange Commission (SEC) as of December 14, 2018. The Managing Member and Chief Executive Officer of the firm is Jayesh (Jay) K. Patel. For a complete description of the services offered by the firm see Item 4B.

B. Description of Advisory Services Offered

Internet Advisor

Wefea Capital LLC (herein referred to as “Wefea Capital” or “Advisor”) has created a proprietary technology platform to help address the United States student loan debt issue that now totals \$1.6 Trillion dollars among 45 million borrowers. Current federal initiatives focus on capping and shortening the duration of student loan payments, which alleviates the burden for students but results in even higher spending by the government. Wefea Capital’s strategy encourages and rewards repayment and, we believe, would ultimately cost the government less, benefiting all those involved, such as, the students, lenders, local communities, states and the nation.

Wefea Capital has created an asset management product, namely, Student Loan Repayment 67 (herein referred to as “SLR 67”) for students who believe in investment and who want to repay their student loans earlier than scheduled. SLR 67 is an investment tool for students who have student loans with assigned lenders and is also available to universities, employers, lenders, banks, broker-dealers and government bodies (herein referred to as “clients”).

Wefea Capital has built an entire ecosystem in secured Cloud computing. All interested clients will join online. The target audience is students (current or graduates) who have \$100,000 or more in outstanding student debt and scheduled for loan payment in 10 to 30 years; and, parents seeking an alternative to saving for their child’s future college education. Every client will have real time secure connectivity from any browser, wireless device or desktop/laptop through the cloud infrastructure to monitor the progress of their account.

Three specific types of accounts are established for the program:

Individual – an individual will sign up directly at www.slr67.net. They can elect a \$5/\$7/\$10 per day contribution; \$5,000/\$10,000 one time contribution and can make multiple contributions per year.

Employer – an employer can participate in SLR 67 by introducing SLR 67 to employees who have a student loan balance. SLR 67 will interface with employees payroll account. SLR 67 will have direct connectivity between the bank and the Employer’s bank to collect participating employee’s periodic transfers. Employees can elect a per paycheck contribution of \$100 and Employers can elect a contribution by matching the employees contribution either dollar for dollar, or dollar to fifty cents or twenty five cents.

University – SLR 67 will interface with Financial Aid Departments at Universities to access and exchange student information. Universities can package the SLR 67 program during disbursement of financial aid.

Once the type of account type is established, a term is selected: 3, 5 or 7 years.

Student's parents, relatives and friends can pledge one/multiple/recurring contributions directly to the student's account. Gift tax deductions may qualify upon the individual consulting with their own Certified Public Accountant.

Deposits are then made into the account using a bank transfer. Additional deposits can be made at any time. A minimum dollar amount of \$500 per year is required to maintain an account.

As the funds are received into Wefea Capital's bank account established for this program, the funds will then be transferred into an account held at Charles Schwab Corporation and E-Trade Securities and managed by the Advisor according to the term selected. The Advisor will manage the funds using any of the following asset classes; exchange listed securities, over-the-counter securities, foreign securities, mutual funds, United States government securities, and interests in partnerships investing in real estate to accomplish the objective of diversifying the portfolio in an effort to reduce risk and increase performance to meet the objective of the term selected by the student for repayment of the outstanding student loan.

The return on the investment is earned based on the closing account balance of the semi-annual cut-off dates, Jun 30 and Dec 31. On the next cut-off date, the return will be paid based on Wefea Capital's rate of return for the previous six month period. As an example, assuming a 4% six month return rate, on \$10,000 in your account on Jun 30, you will earn \$400 interest on Dec 31.

At the end of the term, a loan payment of the principal and interest earned is made directly to the lender.

Wefea Capital manages the individual's funds and will provide quarterly reports on the fund. Wefea Capital strongly recommends that users of this tool should not make any investment decision without consulting your personal financial advisor, and conducting your own research, including the careful review of prospectuses, annual reports, quarterly reports, and other public filings. Further, Clients who use this site are strongly encouraged to conduct their own research into any investment adviser or broker named on the site, including but not limited to consulting with independent tax, legal or a financial adviser as necessary.

Wefea Capital's web site from time to time will offer educational online seminars to its users on topics including, but not be limited to, general investing, current economic market conditions, or general investment products. For this service, Wefea Capital will charge a per attendee fee of \$50. The attendee fee will be deducted from the client's account after attendance at the online seminar.

C. Clients Tailored Services and Client Imposed Restrictions

The SLR 67 program is designed to help students repay their outstanding student loan sooner within the time frame selected by the user. Wefea Capital will utilize appropriate assets classes as outlined in Item 4A to help grow the portfolio to meet that objective. Therefore, users will not be able to impose restrictions on investing in certain securities or type of securities.

D. Wrap Fee Programs

Wefea Capital does not provide portfolio management services to wrap fee programs.

E. Assets Under Management

As of December 17, 2018, Wefea Capital has no clients and therefore no client assets under management.

Item 5 Fees and Compensation

A. & B. Method of Compensation and Fee Schedule and Client Payment of Fees

Asset Management Fees

Wefea Capital will charge an annual management fee of 1.00% on the funds in the SLR 67 program. The management fee will be charged quarterly, payable in arrears, based on the value of portfolio assets of that account on the last business day of the preceding quarter.

This fee is not negotiable. Asset management fees will be automatically deducted from the SLR 67 account on a quarterly basis by the qualified custodian. By signing on to the SLR 67 program the client will give written authorization permitting the Advisor to be paid directly from the assets in that account held by the custodian. The custodian will send a quarterly statement to the client.

Early Termination Fee

Clients of the SLR 67 program who elect to terminate their account prior to the selected year timeframe will be charged an early termination fee. The purpose of the early termination fee is to encourage students to remain in the program with the goal of helping to pay down their current student loan debt. The early termination fee of \$500 will be deducted by the custodian from the amount refunded to the client.

C. Additional Client Fees Charged

Charles Schwab Corporation and E-Trade Securities, the broker-dealer/custodians (herein referred to as “custodian”) holding the funds in the SLR 67 account will not charge fees to any clients of the SLR 67 program. The asset management fee paid to Wefea Capital for investment advisory services managing the funds in that account will be deducted from the account by the custodian. See Item 5A&B. There are no other custodial, securities or brokerage execution fees charged by the custodian and executing broker-dealer to clients of the SLR 67 program. See Item 12 Brokerage Practices, for further information of brokerage and transaction costs.

D. Prepayment of Client Fees

Wefea Capital’s asset management fee is payable in arrears, therefore this question is not applicable.

E. External Compensation for the Sale of Securities to Clients

Not applicable to Wefea Capital or its supervised persons.

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

Wefea Capital does not charge performance-based fees and therefore does not engage in side-by-side management.

Item 7 Types of Clients and Minimum Account Size

The users of Wefea Capital’s web site are individuals with current student loan debt, lenders, banks, broker-dealer firms or parents of children seeking to create a college fund for their child.

The SLR 67 program works best for students with outstanding student loan debt of \$25,000 or more. However, users of the SLR 67 program may utilize the service with any amount they need to pay back to the lender understanding that there is a minimum dollar amount of \$500 per year to maintain an account.

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

A. Methods of Analysis and Investment Strategies

The Advisor utilizes fundamental, technical or cyclical analysis techniques in managing the SLR 67 account held at Charles Schwab Corporation and E-Trade Securities.

Fundamental analysis of businesses involves analyzing its financial statements and health, its management and competitive advantages and its competitors and markets. Fundamental analysis is performed on historical and present data but with the goal of making financial forecasts. There are several possible objectives; to conduct a company stock valuation and predict its probable price evolution; to make a projection on its business performance; to evaluate its management and make internal business decisions and to calculate its credit risk. The risk assumed is that the market will fail to reach expectations of perceived value.

Technical analysis is a method of evaluating securities by relying on the assumption that market data, such as charts of price, volume and open interest can help predict future (usually short-term) market trends. Technical analysis assumes that market psychology influences trading in a way that enables predicting when a stock will rise or fall. The risk is that markets do not always follow patterns and relying solely on this method may not work long term.

Cyclical analysis of economic cycles is used to determine how these cycles affect the returns of an investment, an asset class or an individual company's profits. Cyclical risks exist because the broad economy has been shown to move in cycles, from periods of peak performance followed by a downturn, then a trough of low activity. Between the peak and trough of a business or other economic cycle, investments fall in value to reflect the uncertainty surrounding future returns as compared with the recent past. The risks with this strategy are two-fold 1) the markets do not always repeat cyclical patterns and 2) if too many investors begin to implement this strategy, it changes the very cycles they are trying to gain advantage.

The investment strategies Wefea Capital will implement include long term purchases of securities held at least for one year; and short term purchases for securities sold within a year.

Clients need to be aware that investing in securities involves risk of loss that clients need to be prepared to bear. Clients are strongly encouraged to conduct their own analysis of the services generated by Wefea Capital's SLR 67 program.

B. Investment Strategy and Method of Analysis Material Risks

The methods of analysis and investment strategies followed by Wefea Capital are utilized for all the funds held in the SLR 67 account at the custodian. One method of analysis or investment strategy is not more significant than the other as the Advisor is considering the time horizon of the client.

C. Security Specific Material Risks

The Advisor does not primarily recommend a particular type of security. Every type of investment, including mutual funds, involves risk. Risk refers to the possibility that you will lose money (both principal and any earnings) or fail to make money on an investment. A fund's investment objective and its holdings are influential factors in determining how risky a fund is. Reading the prospectus will help you to understand the risk associated with that particular fund.

Generally speaking, risk and potential return are related. This is the risk/return trade-off. Higher risks are usually taken with the expectation of higher returns at the cost of increased volatility. While a fund with higher risk has the potential for higher return, it also has the greater potential for losses or negative returns. The school of thought when investing in mutual funds suggests that the longer your investment time horizon is the less affected you should be by short-term volatility. Therefore, the shorter your investment time horizon, the more concerned you should be with short-term volatility and higher risk.

Below is a list of some of the risks to consider when investing in mutual funds.

- **Call Risk.** The possibility that falling interest rates will cause a bond issuer to redeem—or call—its high-yielding bond before the bond's maturity date.
- **Country Risk.** The possibility that political events (a war, national elections), financial problems (rising inflation, government default), or natural disasters (an earthquake, a poor harvest) will weaken a country's economy and cause investments in that country to decline.
- **Credit Risk.** The possibility that a bond issuer will fail to repay interest and principal in a timely manner. Also called default risk.
- **Currency Risk.** The possibility that returns could be reduced for Americans investing in foreign securities because of a rise in the value of the U.S. dollar against foreign currencies. Also called exchange-rate risk.
- **Income Risk.** The possibility that a fixed-income fund's dividends will decline as a result of falling overall interest rates.
- **Industry Risk.** The possibility that a group of stocks in a single industry will decline in price due to developments in that industry.
- **Inflation Risk.** The possibility that increases in the cost of living will reduce or eliminate a fund's real inflation-adjusted returns.
- **Interest Rate Risk.** The possibility that a bond fund will decline in value because of an increase in interest rates.
- **Manager Risk.** The possibility that an actively managed mutual fund's investment adviser will fail to execute the fund's investment strategy effectively resulting in the failure of stated objectives.
- **Market Risk.** The possibility that stock fund or bond fund prices overall will decline over short or even extended periods. Stock and bond markets tend to move in cycles, with periods when prices rise and other periods when prices fall.
- **Principal Risk.** The possibility that an investment will go down in value, or "lose money," from the original or invested amount.

Here are other risks of investing to consider:

Asset Class Risk

Securities in the portfolio(s) or in underlying investments such as mutual funds may underperform in comparison to the general securities markets or other asset classes.

Concentration Risk

To the extent that Wefea Capital invests in portfolio allocations that are concentrated in a particular market, industry or asset class, the portfolio is susceptible to loss due to adverse occurrences affecting that market, industry, or asset class.

Equity Securities Risk

Equity securities are subject to changes in value that are attributable to market perception of a particular issuer or general stock market fluctuations that affect all issuers. Investments in equity securities are more volatile than other types of investments.

Foreign Securities Risk

Foreign investments tend to be more volatile than U.S. securities, and are subject to risks that are not typically associated with U.S. securities. For example, such investments are adversely affected by changes in currency rates and exchange control regulations, unfavorable political, social and economic developments, and the possibility of seizure or nationalization of companies or imposition of withholding taxes on income. Moreover, less information is publicly available concerning certain foreign issuers than is available concerning U.S. companies. Foreign markets tend to be more volatile than the U.S. market due to economic and political instability, social unrest and regulatory conditions in certain countries.

Emerging Market Securities Risk

Many of the risks with respect to foreign investments are more pronounced for investments in developing or emerging market countries, which include several countries in Asia, Latin America, Eastern Europe, Africa, and the Middle East. The 10 economies of many of these countries depend heavily upon international trade and are therefore significantly affected by protective trade barriers and economic conditions of their trading partners. Many of these countries have government exchange controls, currencies with no recognizable market value relative to the established currencies of developed market economies, little or no experience in trading in securities, no financial reporting standards, a lack of banking or securities infrastructure, and a legal tradition which does not recognize rights to private property.

Growth Securities Risk

Growth companies are companies whose earnings growth potential appears to be greater than the market, in general, and whose revenue growth is expected to continue over an extended period. Stocks of growth companies or “growth securities” have market values that are more volatile than those of other types of investments. Growth securities typically do not pay a dividend, which helps cushion stock prices in market downturns and reduce potential losses.

Issuer Risk

The account’s performance depends on the performance of individual securities in which the account invests. Any issuers performing poorly, causing the value of its securities to decline. Poor performance is caused by poor management decisions, competitive pressures, changes in technology, disruptions in supply, labor problems or shortages, corporate restructurings, fraudulent disclosures, or other factors. Changes to the financial condition or credit rating of an issuer of those securities causes the value of the securities to decline.

Management Risk

The performance of the account is subject to the risk that our investment management strategy will not produce the intended results.

Market Risk

The account will lose money over short periods due to short-term market movements and over longer periods during market downturns. The value of a security declines due to general market conditions, economic trends, or events that are not specifically related to the issuer of the security or to factors that affect a particular industry or industries. During a general downturn in the securities markets, multiple asset classes are negatively affected.

Political Risk

Government decisions can damage the value of the investments. Changes to social security, benefits law, and tax law impact your financial decisions. Any foreign investments are impacted by the decision of their local governments.

Market Trading Risks

The investment account faces numerous market trading risks, including the potential lack of an active market for investments held in the account and losses from trading in secondary markets.

Passive Investment Risk

Wefea Capital uses a passive investment strategy that is not actively managed where we do not attempt to take defensive positions in declining markets.

Larger Company Securities Risk

Securities of companies with larger market capitalizations underperform securities of companies with smaller and mid-sized market capitalizations in certain economic environments. Larger, more established companies might be unable to react as quickly to new competitive challenges, such as changes in technology and consumer tastes. Some larger companies are unable to grow at rates higher than the fastest growing smaller companies, especially during extended periods of economic expansion.

Short Selling Risk

Short selling is highly risky. Short selling stocks generate unlimited losses while the upside is capped, as the price of a stock can in theory rise infinitely but cannot drop below zero. Over the long term, stock prices overall tend to rise rather than fall. As a result, short selling is against the overall direction of the market. Shorting stocks also involves using borrowed money, which creates leverage risk. This strategy is also subject to the risk of inaccurate timing. Even if the price of a stock falls substantially eventually, the price could rise in the near term, leading to losses for the short sellers.

Liquidity Risk

A security is not able to be sold at the time desired without adversely affecting the price.

Regulatory Risk

Changes in government regulations adversely affect the value of a security. An insufficiently regulated industry or market might also permit inappropriate practices that adversely affect an investment.

Smaller Company Securities Risk

Securities of companies with smaller market capitalizations, historically, tend to be more volatile and less liquid than larger company stocks. Smaller companies have no or relatively short operating histories, or be newly public companies. Some of these companies have aggressive capital structures, including high debt levels, or are involved in rapidly growing or changing industries and/or new technologies, which pose additional risks.

Value Style Investment Risk

Value stocks perform differently from the market as a whole and from other types of stocks. Value stocks purchased based upon the belief that a given security is out of favor. Value investing seeks to identify stocks that have depressed valuations, based upon a number of factors which are thought to be temporary in nature, and to sell them at superior profits when their prices rise when the issues which caused the valuation of the stock to be depressed are resolved. While certain value stocks increase in value more quickly during periods of anticipated economic upturn, they also lose value more quickly in periods of anticipated economic downturn. Furthermore, there is a risk that the factors which caused the depressed valuations are longer term or even permanent in nature, and that there will not be any rise in value. Finally, there is the increased risk in such situations that such companies will not have sufficient

resources to continue as ongoing businesses, which would result in the stock of such companies potentially becoming worthless.

Small Firm Risk

Wefea Capital is reliant on research from Wall Street's leading firms—including hedge funds—to help us in our investment decisions. In addition, we do not have the financial resources that other, larger firms have to invest in market data systems or industry consultants to provide insight on specific companies or industries in which we invest.

Interests in partnerships investing in real estate:

Real estate investment trusts ("REITs") allow individuals to invest in large-scale, income-producing real estate. A REIT is a company that owns and typically operates income-producing real estate or related assets. These include office buildings, shopping malls, apartments, hotels, resorts, self-storage facilities, warehouses, and mortgages or loans. Unlike other real estate companies, a REIT does not develop real estate properties to resell them. Instead, a REIT buys and develops properties primarily to operate them as part of its own investment portfolio.

Many REITs are registered with the Securities and Exchange Commission and are publicly traded on a stock exchange. These are known as publicly traded REITs. Others are registered with the Securities and Exchange Commission but are not publicly traded. These are known as non-traded REITs (also known as non-exchange traded REITs). This is one of the most important distinctions among the various kinds of REITs. Before investing in a REIT, you need to understand whether or not it is publicly traded, and how this could affect the benefits and risks to you.

There are some risks, especially with non-exchange traded REITs because they do not trade on a stock exchange, such as:

Lack of Liquidity: Non-traded REITs are illiquid investments. They cannot be sold readily on the open market. If you need to sell an asset to raise money quickly, you will not be able to do so with shares of a non-traded REIT.

Share Value Transparency: While the market price of a publicly traded REIT is readily accessible, it can be difficult to determine the value of a share of a non-traded REIT. Non-traded REITs typically do not provide an estimate of their value per share until 18 months after their offering closes. This can be years after you have made your investment. As a result, for a significant time period you will be unable to assess the value of your non-traded REIT investment and its volatility.

Distributions Paid from Offering Proceeds and Borrowings: Investors who are attracted to non-traded REITs is because of their relatively high dividend yields compared to those of publicly traded REITs. Unlike publicly traded REITs, however, non-traded REITs frequently pay distributions in excess of their funds from operations. To do so, they use offering proceeds and borrowings. This practice, which is typically not used by publicly traded REITs, reduces the value of the shares and the cash available to the company to purchase additional assets.

Conflicts of Interest: Non-traded REITs typically have an external manager instead of their own employees. This leads to potential conflicts of interests with shareholders. For example, the REIT pays the external manager significant fees based on the amount of property acquisitions and assets under management. These fee incentives likely will not necessarily align with the interests of shareholders.

Alternative Strategy Mutual Funds. Certain mutual funds available in the program invest primarily in alternative investments and/or strategies. Investing in alternative investments and/or strategies will not be

suitable for all investors and involves special risks, such as risks associated with commodities, real estate, leverage, selling securities short, the use of derivatives, potential adverse market forces, regulatory changes and potential illiquidity. There are special risks associated with mutual funds that invest principally in real estate securities, such as sensitivity to changes in real estate values and interest rates and price volatility because of the fund's concentration in the real estate industry.

It is important to note that no methodology or investment strategy is guaranteed to be successful or profitable. Investing in securities involves the risk of loss that clients should be prepared to bear.

Item 9 Disciplinary Information

Clients need to be aware that neither Wefea Capital nor its management persons have had any legal or disciplinary events, currently or in the past.

Item 10 Other Financial Industry Activities and Affiliations

A. Broker-Dealer or Representative Registration

Wefea Capital is not a broker-dealer nor are any of its management persons registered representatives of a broker-dealer.

B. Futures or Commodity Registration

Wefea Capital does not have an application pending as a futures commission merchant, commodity pool operator, or a commodity trading advisor, or as an associated person of the foregoing entities.

C. Material Relationships Maintained by this Advisory Business and Conflicts of Interest

Jay Patel, CEO of Wefea Capital LLC is also an owner of Wefea Inc. Wefea Inc. manufactures computer software tape and disks within the electronic equipment and components business sector. Advisory clients of Wefea Capital LLC are not solicited for the services of Wefea Inc. therefore no conflict of interest exists. Mr. Patel spends approximately 85% of his time on activities related to Wefea Inc.

D. Recommendation or Selection of Other Investment Advisers and Conflicts of Interest

Wefea Capital does not recommend or select other investment advisers for clients.

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

A. Code of Ethics Description

Wefea Capital is registered with the SEC and maintains a Code of Ethics pursuant to SEC rule 204A-1. Wefea Capital has adopted a Code of Ethics that sets forth the basic policies of ethical conduct for all managers, officers, and employees of the adviser. In addition, the Code of Ethics governs personal trading by each employee of Wefea Capital deemed to be an Access Person and is intended to ensure that securities transactions effected by Access Persons of Wefea Capital are conducted in a manner that avoids any conflict of interest between such persons and clients of the adviser or its affiliates. Wefea Capital collects and maintains records of securities holdings and securities transactions effected by Access Persons. These records are reviewed to identify and resolve conflicts of interest. Wefea Capital maintains a code of ethics and they will provide a copy to any client or prospective client upon request.

B. Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest

Neither Wefea Capital nor any of its related persons recommend to any individual clients or buys or sells for their own account, securities in which Wefea Capital has a direct material financial interest. Therefore, the Advisor does not have a conflict of interest.

C. Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest

As previously stated above, Wefea Capital does not buy securities for its own account so no conflict exists at the firm level.

Access Persons do not own the same securities invested in the SLR 67 program. However, Wefea Capital requires that its Access Persons follow its basic policies and ethical standards as set forth in its Code of Ethics as outlined in Item 11.

D. Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest

See the response to Item 11C above.

Item 12 Brokerage Practices

A. Factors Used to Select Broker-Dealers for Client Transactions

Clients utilizing the SLR 67 program will issue a transfer of funds into an account under the name of Wefea Capital for management at Charles Schwab Corporation and E-Trade Securities the custodians. The inclusion of Charles Schwab Corporation and E-Trade Securities names on the site should not be construed by the Client as a recommendation or endorsement of either custodian by Wefea Capital to the client. **Client's should be aware that Wefea Capital has performed a review and analysis of both custodians, however, clients are strongly encouraged to research the named custodian and the services they provide prior to engaging in this program.**

Research and Other Soft Dollar Benefits.

Wefea Capital does not receive research or other products or services from a broker-dealer or any third party.

Brokerage for Client Referrals.

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

Directed Brokerage.

Clients that elect to invest in the SLR 67 program will transfer funds into an account held at Charles Schwab Corporation and E-Trade Securities, as the broker-dealers and custodians of that account. Wefea Capital utilizes Charles Schwab Corporation and E-Trade Securities, based on criteria such as, but not limited to, reasonableness of services offered to the Advisor, tools and services made available to the client and the Advisor, and convenience of access to the account trading and reporting.

As an investment advisory firm, Wefea Capital has a fiduciary duty to seek best execution for assets held in that account on behalf of its clients. While best execution is difficult to define and challenging to measure, there is some consensus that it does not solely mean the achievement of the best price on a given transaction. Rather, it appears to be a collective consideration of factors concerning the trade in question.

Such factors include the security being traded, the price of the trade, the speed of the execution, apparent conditions in the market, and the specific needs of the client. Wefea Capital's primary objectives when placing orders for the purchase and sale of securities for the account is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the broker. Wefea Capital may not necessarily pay the lowest commission or commission equivalent as specific transactions involve specialized services on the part of the broker.

If the firm permits a client to direct brokerage, describe your practice.

Wefea Capital does not allow for clients of the SLR 67 program to direct brokerage outside of the established broker-dealer/custodial relationships the Advisor has in place.

B. Aggregating Securities Transactions for Client Accounts

Wefea Capital does not aggregate trades because the trades are executed for one account, the account held at Charles Schwab Corporation and E-Trade Securities.

Item 13 Review of Accounts

A. Indicate whether your firm periodically reviews client accounts or financial plans. If you do, describe the frequency and nature of the review and the titles of the supervised persons who conduct the review.

The SLR 67 account is monitored on a weekly basis. The nature of the review is to determine if the account is still in line with the investment objectives and market conditions. Hariharan Iyer, Chief Compliance Officer will review the SLR 67 account.

B. If the firm reviews client accounts on other than a periodic basis, describe the factors that trigger a review.

See the response to Item 13A.

C. Describe the content and indicate the frequency of regular reports the firm provides to clients regarding their accounts. State whether these reports are written.

Clients of the SLR 67 program will have 'real time' access to view the account held at Charles Schwab Corporation and E-Trade Securities. Clients will be able to view the account's performance, deposits made, as well as all withdrawals from that account.

Wefea Capital has engaged the services of a Certified Public Accountant to perform a surprise annual exam of the funds in the SLR 67 account. A copy of the audited report will be posted on the SLR 67 program website for users to view.

Item 14 Client Referrals and Other Compensation

A. Economic Benefits Provided to the Advisory Firm From External Sources and Conflicts of Interest

Wefea Capital does not currently have any such arrangements therefore this question is not applicable.

B. Advisory Firm Payments for Client Referrals

Other than compensating current employees of Wefea Capital for client referrals, the Advisor does not currently have any other arrangements, in place, therefore this question is not applicable.

Item 15 Custody

Under federal regulations, Wefea Capital is deemed to have custody of client assets who are invested in the SLR 67 program, as the Advisor has the ability to directly access the funds in that account. Clients of that program will transfer funds into an account held at the custodian, Charles Schwab Corporation and E-Trade Securities under the Advisor's name for investment on behalf of its clients. As such, Wefea Capital has engaged the services of a Certified Public Accountant, namely, Matthew Perreault, of Armanino LLP to perform an annual surprise exam of the funds held in the SLR 67 account.

Also, the Advisor instructs the qualified custodian to deduct our advisory fees directly from that account. Charles Schwab Corporation and E-Trade Securities, the qualified custodians utilized by Wefea Capital maintains actual custody of your assets. The annual audit report of the SLR 67 account will be posted on the SLR 67 website for clients to view. All clients of the program will have online access to view the assets in the account. Any discrepancies should be immediately brought to the firm's attention.

Item 16 Investment Discretion

Wefea Capital has discretion over the selection and amount of securities to be bought or sold in the SLR 67 account without obtaining prior consent or approval from the client for each transaction. However, these purchases or sales will be subject to specified investment objectives established by the Advisor

Discretionary authority will only be provided upon full disclosure to the client. The granting of such authority will be evidenced by the client's engagement of Wefea Capital, as the investment advisor, for management of the SLR 67 program, when client's sign on for the program.

Item 17 Voting Client Securities

Wefea Capital has adopted and implemented written Proxy Voting Policies and Procedures ("Proxy Voting Procedures") which are designed to reasonably ensure that Wefea Capital votes proxies in the best interest of its clients where the adviser has voting authority.

The Proxy Voting Procedures describes how Wefea Capital addresses voting authority, material conflicts of interest, voting decisions, notification to the client, and books and records requirements, and ensures that proxies are voting in the best interest of its clients.

Wefea Capital acknowledges and agrees that it has a fiduciary obligation to its clients to ensure that any proxies for which it has voting authority are voted solely in the best interests and for the exclusive benefit of its clients. The Proxy Voting Procedures are intended to guide Wefea Capital and its personnel in ensuring that proxies are voted in such manner without limiting Wefea Capital or its personnel in specific situations to vote in a predetermined manner. These policies are designed to assist Wefea Capital in identifying and resolving any conflicts of interest it has in voting client proxies.

Item 18 Financial Information

A. Balance Sheet

Wefea Capital does not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance, therefore a Balance Sheet is not included with this Brochure.

B. Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients

Wefea Capital has discretionary authority over the SLR 67 account and is not aware of any financial condition that will likely impair its ability to meet contractual commitments to clients. If Wefea Capital does become aware of any such financial condition, this brochure will be updated and clients will be notified.

C. Bankruptcy Petitions During the Past Ten Years

Not applicable to Wefea Capital.

Privacy Policy

Wefea Capital

Effective: December 17, 2018

Our Commitment to You

Wefea Capital LLC (herein referred to as "Wefea Capital") is committed to safeguarding the use of your personal information that we have as your Investment Advisor. Wefea Capital (referred to as "we", "our" and "us" throughout this notice) protects the security and confidentiality of the personal information we have and make efforts to ensure that such information is used for proper business purposes in connection with the management of the SLR 67 program. Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything we can to maintain that trust.

We do not sell your non-public personal information to anyone. Nor does Wefea Capital provide such information to others except for discrete and proper business purposes in connection with the servicing and management of the SLR 67 program.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this privacy policy.

The Information We Collect About You

You typically provide personal information when you register online for access to the SLR 67 program. This information includes the following:

Driver's License number	Date of Birth
Social security or taxpayer identification number	
Name, address and phone number(s)	
E-mail address(es)	
Student Loan Lender information	

In addition, we collect non-public information about you from the following sources:

- Information we receive in the course of establishing a customer relationship including, but

- not limited to, applications, forms, or other online documents;
- Information about your transactions with us or others

Information about You That Wefea Capital Shares

Wefea Capital works to provide products and services that benefit our customers. We share non-public personal information with non-affiliated third parties (such as brokers and custodians) as necessary for us to provide agreed services and products to you consistent with applicable law. We also disclose non-public personal information to other financial institutions with whom we have joint business arrangements for proper business purposes in connection with the management or servicing of the SLR 67 account. In addition, your non-public personal information will also be disclosed to you, persons we believe to be your authorized agent or representative, regulators in order to satisfy Wefea Capital's regulatory obligations, and is otherwise required or permitted by law. Lastly, we will disclose your non-public personal information to companies we hire to help administrate our business. Companies we hire to provide services of this kind are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific service we have requested.

To repeat, we do not sell your non-public personal information to anyone.

Information about Former Clients

Wefea Capital does not disclose, and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our clients.

Confidentiality and Security

Our employees are advised about the firm's need to respect the confidentiality of our customers' non-public personal information. Additionally, we maintain physical, procedural and electronic safeguards in an effort to protect the information from access by unauthorized parties.

We'll keep you informed

Our privacy policy will be posted on our website for review. Periodically we may revise our privacy policy, and will post a revised policy if the changes materially alter the previous privacy policy. We will not, however, revise our privacy policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing. You can obtain a copy of our current privacy policy by accessing the website www.slr67.net.

Item 1 Form ADV Part 2B Brochure Supplement – Hariharan Iyer

Hariharan Iyer
Personal CRD #7044470

Wefea Capital LLC
Firm CRD #:299615

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Effective Date: December 17, 2018

This brochure supplement provides information about Hariharan Iyer that supplements the Wefea Capital LLC brochure. You should have received a copy of that brochure. Please contact Hariharan.r.iyer@gmail.com if you did not receive Wefea Capital's brochure or if you have any questions about the contents of this supplement.

Additional information about Hariharan Iyer, CRD #7044470 is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Educational Background/Business Experience

Hariharan Iyer, born 1976, graduated with a Master of Business Administration in Finance Operations from Indian Institute of Management Calcutta (“IIM”), 2002; and, graduated as a Mechanical Engineer from Veermata Jijabai Technological Institute, Mumbai University, 1997.

Mr. Iyer has passed the Series 65 exam, October 2018.

Mr. Iyer is the Chief Compliance Officer of Wefea Capital as of November 2018 to present. He is also a SCM Architect with Nvidia from February 2016 to present. Prior to that, he was employed by AVCO Consulting as an APO Consultant from November 2014 to January 2016; a APO Consultant with Bayer Pharmaceuticals from February 2014 to November 2014; a (TITLE) with Orion Technologies from June 2013 to January 2014; and, a (TITLE) with Samuha Inc. from March 2005 to May 2013.

Item 3 Disciplinary Information

There are no legal or disciplinary events or proceedings to report concerning Mr. Iyer.

Description of a professional attainment, designation, or license being revoked or suspended.

Not applicable to Mr. Iyer.

Item 4 Other Business Activities

No other business activities to report concerning Mr. Iyer.

Item 5 Additional Compensation

Mr. Iyer does not receive compensation or other economic benefit from anyone for providing advisory services other than what has been described in the Wefea Capital Brochure.

Item 6 Supervision

Hariharan Iyer, Chief Compliance Officer, monitors the investment advisory activities, personal investing activities, and adherence to the Advisor’s compliance program and code of ethics of Wefea Capital’s supervised persons on a continuous basis using various methods, including periodic inspection and review of client securities positions and transaction activity, obtaining certifications of compliance with company policies and procedures from those supervised, and obtaining and reviewing brokerage statements or transactions and holdings reports of the supervised persons. To provide adequate oversight of Wefea Capital personnel, Jay Patel, CEO, will provide the same oversight activities over the Chief Compliance officer. Hariharan Iyer can be reached at (925) 218-1839.