

Part 2A of Form ADV: Firm Brochure
Item 1 Cover Page



**Wise Money Israel Ltd
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Binyamina
Israel, 3057319**

CRD No. 304753

www.wisemoneyisrael.com

This brochure provides information about the qualifications and business practices of Wise Money Israel Ltd. If you have any questions about the contents of this brochure, please contact us at +972-54-793-1830 and/or info@wisemoneyisrael.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. Additional information about Wise Money Israel Ltd also is available on the SEC's website at www.adviserinfo.sec.gov.

Wise Money Israel Ltd.'s registration as an investment adviser does not imply a certain level of skill or training.

Effective Date: July 29, 2019

Item 2 Material Changes

Summary of Material Changes

This section will be updated as required in the event any material changes are made to the Wise Money Israel Ltd Firm Brochure (the “Brochure”):

- a) Wise Money Israel Ltd is a new investment advisory firm, so there are no material changes to report at this time.

Delivery Requirements

We will provide a summary of any material changes to this Brochure to our clients at least annually, within 120 days of our fiscal year end. Furthermore, we will provide our clients with other interim disclosures about material changes, as necessary.

A complete copy of our current Form ADV Part 2A and/or 2B may be requested free of charge by contacting us by telephone at +972-54-793-1830 or by email at info@wisemoneyisrael.com.

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Item 4 Advisory Business

FIRM DESCRIPTION

Wise Money Israel Ltd (hereinafter referred to as “Wise Money Israel”, “we”, “us”, or “our firm”) is an Israeli limited company (“Ltd”) with its principal office located in Binyamina, Israel and has been in business as a registered investment adviser with the U.S. Securities and Exchange Commission since 2019. The principal owner of the firm is Evan Liberman.

As a registered investment adviser, we are a fiduciary to you, our client, meaning we have a fundamental obligation to act and provide investment advice that is in your best interest. Should any material conflicts of interest exist that might affect the impartiality of our investment advice, they will be disclosed to you in this Brochure. We urge you to review this Brochure carefully and consider our qualifications, business practices and the nature of our advisory services before becoming our client.

ADVISORY PROGRAMS

Wise Money Israel provides investment management, investment consulting and data reporting for client tax preparation services to our clients. In connection with our investment management services, Wise Money Israel provides advice with respect to the following asset classes: equities (common stocks and equivalents), mutual funds, Exchange Traded Funds (“ETFs”) and fixed income instruments. Our advice is generally limited to these types of investments, but we reserve the right to advise or not advise our clients on certain investments should we deem it appropriate based on their particular circumstances.

Our advisory services are offered through certain individuals who have registered with Wise Money Israel as its investment adviser representatives (“advisors”). Clients should refer to such advisor’s Form ADV Part 2B (the “Brochure Supplement”) for more information about their qualifications.

Wise Money Israel’s advisory services are tailored to the needs of our clients based on their individual investment objectives, risk tolerance, cash or income needs, and any investment restrictions. Although Wise Money Israel seeks to accommodate any reasonable investment restrictions or guidelines set by our clients, we may decline to accommodate certain investment restrictions that are incompatible with our firms’ investment philosophy or that may have an adverse effect on our ability to manage your account.

Wise Money Israel enters into formal written agreements with our clients setting forth the terms and conditions under which we will provide our advisory services (the “Engagement Agreement”). The Engagement Agreement sets forth the scope of the services to be provided and the compensation we receive from the client for such services. The client may terminate the Engagement Agreement in writing at any time. Wise Money Israel may terminate the Engagement Agreement in writing at any time by giving thirty (30) days signed written notice to the client.

As of July 29, 2019, Wise Money Israel manages approximately \$30,981,360 million in assets on a discretionary basis and \$2,825,343 in assets on a non-discretionary basis.

Wise Money Israel offers all or any combination of the advisory services described below to our clients:

PREMIUM ACCOUNT PROGRAM.

Wise Money Israel offers discretionary fully managed investment accounts to U.S. and Non-U.S. clients. Premium accounts are available for clients who initially invest \$100,000+ USD (or equivalent in another currency), with no limit to the level of funds that may be invested.

I. Investment Management Services. Wise Money Israel provides discretionary investment management services to personal, corporate or IRA accounts where client portfolios are managed according to the client's stated investment goals and objectives. Working closely with an advisor, clients will establish realistic and measurable investment goals and objectives to meet those goals will be defined. An advisor will recommend that clients allocate their investment portfolio among various asset classes. Once the appropriate asset allocation has been determined, the portfolio will be monitored and rebalanced on an ongoing basis as changes in market conditions and client circumstances occur. As part of these investment management services, we have an ongoing responsibility to select and make recommendations to our clients as to specific securities or other investments that may be purchased or sold for a client's portfolio.

Wise Money Israel exercises discretionary authority over client investments where we manage the client's account(s) without client consultation after the initial establishment of the client's investment objectives and appropriate asset allocation. Wise Money Israel receives discretionary authority from our clients through our Engagement Agreement at the outset of our advisory relationship. We generally do not manage Premium Personal Accounts on a non-discretionary basis. We may, however, from time to time make an exception upon client request.

Wise Money Israel provides account opening services to Non-U.S. Premium Account program clients. U.S. clients of Wise Money Israel are responsible for open their brokerage accounts with Interactive Brokers LLC and their self-directed IRA accounts with Advanta IRA.

SELF-MANAGED ACCOUNT PROGRAM.

Wise Money Israel provides non-discretionary investment management services to personal, corporate or IRA accounts. Self-Managed accounts are available for clients who can initially invest \$5,000 USD (or equivalent in another currency) or more, with no limit to the level of funds that can be invested. Once a client reaches an account balance of \$100,000 USD (or equivalent) their account can become a Premium managed account. Self-Managed accounts are divided into three tiers: **Bronze**, **Silver** and **Gold**. Wise Money Israel does not provide discretionary or on-going investment management services to Self-Managed Accounts.

I. Brokerage Account Opening Services.

U.S. Clients. Wise Money Israel does not provide account opening services to U.S. clients. U.S. clients of Wise Money Israel are responsible for opening their brokerage accounts with Interactive Brokers LLC and their self-directed IRA accounts with Advanta IRA. **U.S. broker-dealers must send an account-opening letter to each client at their physical mailing address after the account is approved.**

Non-U.S. Clients. Wise Money Israel provides non-U.S. Self-Managed Account clients with brokerage account opening services. Wise Money Israel requires non-U.S. Gold Level Self-Managed Account clients to provide our firm with Power of Attorney to effectuate the implementation of the client-approved portfolio and initial securities transactions.

- a) Bronze Level.** Wise Money Israel Sole Proprietorship, a DBA for Evan Liberman Sole Proprietorship, offers account opening services for non-U.S. clients desiring to open an account at a non-U.S. custodian.

The client will be guided through each stage of the account opening process at the designated broker-dealer/custodian. The brokerage account opening consists of preparing paperwork to open a new brokerage account at the designated brokerage firm and account ID certification assistance. The client will be provided instructions how to wire funds from the client's bank directly to the client's brokerage account.

As discussed above, Bronze level clients may purchase Wise Money Israel's additional services in place of the Silver and Gold offerings.

- b) Silver Level.** Personnel of the firm Wise Money Israel Ltd. assist Silver account clients with account opening services. Our firm will guide clients through each stage of the account opening process at the designated brokerage firm. The brokerage account opening consists of preparing paperwork to open a new brokerage account at the client's chosen brokerage and account ID certification assistance.

The client will be provided instructions how to wire funds from the client's bank directly to the client's brokerage account.

- c) Gold Level.** Personnel of the firm Wise Money Israel Ltd. assist Gold account clients with account opening services. Our firm will guide clients through each stage of the account opening process at the designated qualified custodian. The brokerage account opening consists of preparing paperwork to open a new brokerage account at the client's chosen qualified custodian and account ID certification assistance. The client will be provided instructions how to wire funds from the client's bank directly to the client's brokerage account. Our firm will facilitate the conversion of the client's currency, where necessary, so that the client is ready to invest.

Wise Money Israel requires Gold Self-Managed Account clients to provide our firm with Power of Attorney to effectuate the implementation of the client-approved portfolio and initial securities transactions.

Only the client is permitted to authorize, by their signature, the opening of the account. Non-U.S. brokerage firms must send an opening-account letter to each client using a client specified email address, after the account is approved.

II. Investment Management Services. Wise Money Israel provides the following service levels:

- a) **Bronze Level.** Bronze level clients may purchase Wise Money Israel's additional services in place of the discounted Silver and Gold offerings.
- b) **Silver Level.** Wise Money Israel provides Silver level clients with an investment portfolio tailored to the personal needs and requirements. Wise Money Israel does not carry out any purchases of the securities for the Silver level clients. Wise Money Israel does not offer discretionary or on-going investment management services to Silver level clients. Accounts are not monitored by Wise Money Israel under this service. Silver level self-managed account clients must monitor their account(s).
- c) **Gold Level.** Wise Money Israel provides Gold level clients with an investment portfolio tailored to the client's personal needs and requirements. Wise Money Israel executes the initial purchases of the securities for Gold Level clients in their account. Wise Money Israel does not offer discretionary or on-going investment management services to Gold level clients. Accounts are not monitored by Wise Money Israel under this service. Gold level self-managed account clients must monitor their account(s).

Wise Money Israel does not provide on-going investment management services to Self-Managed Account clients.

Please find a detailed summary chart of the services for Self-Managed accounts:

Self-Managed Account Services for non-U.S. Clients			
Service	Tier		
I. Brokerage Account Opening	Bronze*	Silver*	Gold
Opening Account Assistance	Yes	Yes	Yes
ID Certification Assistance	Yes	Yes	Yes
Account Funding Assistance	Yes	Yes	Yes
Currency Conversion	No	No	Yes
II. Investment Management	Bronze*	Silver*	Gold
Portfolio Creation	No	Yes	Yes
Initial Portfolio Securities Purchasing	No	No	Yes

Self-Managed Account Services for U.S. Clients	
Service	Tier

II. Investment Management	Silver	Gold
Portfolio Creation	Yes	Yes
Initial Portfolio Securities Purchasing	No	Yes

***Wise Money Israel is not a party to Bronze or Silver Self-Managed accounts.**

IRA Account Clients. As previously stated, our firm requires both Premium and Self-Managed Account IRA clients to open Self-Directed IRA accounts with Advanta IRA, a third-party IRA administrator, Advanta IRA. Meitav Dash Trade Ltd. serves as the brokerage firm for Self-Directed IRA accounts held with Advanta IRA. Although Mainstar Trust Co. serves as the primary custodian for Advanta IRA, Wise Money Israel clients must request Advanta IRA utilize the custodial services of Meitav Dash Trade Ltd in place of Mainstar Trust Co.

ADDITIONAL SERVICES.

As discussed above, the following services may be purchased individually in place of the discounted Silver and Gold offering:

- **Portfolio Creation.** Wise Money Israel provides, on a one-time basis, a suggested portfolio based on an Investment Questionnaire. The client will be provided an asset class allocation chart, upside/downside projections, and a complete table of what the client should buy and how much of each security or financial asset to purchase himself/herself online. **This service does not include the purchase of any securities recommended as part of the suggested portfolio.**
- **Buying and Selling Securities.** For clients who have already paid for Portfolio Creation, Wise Money Israel will, on a one-time basis, buy or sell their securities online on their behalf via Power of Attorney.
- **Portfolio Creation and Initial Securities Purchasing.** Wise Money Israel provides, on a one-time basis, a suggested portfolio based on an Investment Questionnaire, and on a one-time basis, effects the client-approved securities transactions based on their behalf via Power of Attorney.
- **Additional Funds Allocation.** Wise Money Israel offers clients who already have an existing, invested account a discounted service to create an updated portfolio in order to accommodate additional funds in their account. For Gold level clients, on a one-time basis, Wise Money Israel will also effect the client-approved securities transactions based on their behalf via Power of Attorney. For all other clients, this service does not include the purchase of any securities recommended as part of the suggested portfolio.

These services do not include on-going investment supervision, monitoring, or reporting services. On-going investment management services may be obtained from Wise Money Israel through a separate investment management agreement for the Premium Account Program or through a separate professional investment advisor of the client's choosing. The client is under no obligation

to act upon their advisor's recommendations. If the client elects to action on any of our recommendations, the client is under no obligation to effect their transactions through our firm.

Wise Money Israel is not a party to Bronze or Silver Self-Managed accounts. Wise Money Israel is a party to Gold Self-Managed accounts.

Wise Money Israel does not provide on-going investment management services to Self-Managed Account clients.

DATA REPORT FOR CLIENT TAX PREPARATION.

- **U.S. Clients.** For accounts held at U.S. broker-dealers, certain tax information is provided to the client by the broker-dealer. For accounts held at Interactive Brokers, clients can find an overview of tax information for US persons and entities on the Interactive Brokers website here: <https://www.interactivebrokers.com/en/index.php?f=1554&p=us>.

Tax forms, reports, and statements are available through Client Portal/Account Management by selecting the Reports menu followed by Tax. IBKR does not mail out tax forms. Please review the Tax Information and Reporting page on IBKR's website under the Reports and Dates section here: <https://www.interactivebrokers.com/en/index.php?f=tax&p=explain>, to find which forms and worksheets will be available to U.S. clients and the dates the forms and worksheets will be posted to U.S. clients' Interactive Brokers accounts.

US Persons and Entities	
-	
Year End Tax Forms and Reports for Advisor Clients ¹	
Form/ Worksheet ²	Reported To
Consolidated Form 1099 (Includes forms 1099-INT, 1099-OID, 1099-DIV, 1099-B, 1099-MISC) ³	Internal Revenue Service
Form 1099-R	Internal Revenue Service
Form 2439 (for calendar year RICs)	Internal Revenue Service
Form 5498	Internal Revenue Service
Annual Statement	
Dividend Report	
Worksheet for Form 8949	

¹ <https://www.interactivebrokers.com/en/index.php?f=1554&p=explain>

² Information on the Consolidated Form 1099 can be accessed on IBKR's website here: <https://www.interactivebrokers.com/en/index.php?f=1554&p=us1> ; Information on all other Forms and Worksheets can be accessed on IBKR's website here: <https://www.interactivebrokers.com/en/index.php?f=1554&p=us2>

³ For US Persons, IBKR issues 1099 forms in a consolidated format. Most 1099 forms will appear on one statement rather than as separate forms. Information reported on the Consolidated Form 1099 is also reported to the IRS and should be reported on your federal tax return. Please consult your tax advisor for proper reporting of all Form 1099 amounts.

Gain/Loss Worksheet for 1256 Contracts	
WHFIT Tax Information Statement	

Note: IRS Circular 230 Notice - These statements are provided for information purposes only, are not intended to constitute tax advice which may be relied upon to avoid penalties under any federal, state, local or other tax statutes or regulations, and do not resolve any tax issues in your favor.

- **Non-U.S. Clients.** For accounts held at non-U.S. custodians, tax data may not be in English and does not properly prepare the client with the data necessary to submit a tax report in their country.
 - **Premium Account Program Clients:** Annually, Wise Money Israel Ltd. provides Premium Account clients a complementary data report, an unofficial tax worksheet, which can be used by clients to prepare and report their local taxes. Wise Money Israel reviews each Premium Account clients' investment account data and develops the data report. The client is under no obligation to utilize this data in the preparation of their local tax report.

Wise Money Israel Ltd. is not qualified to, and does not purport to provide, any legal, accounting, estate, actuary, or tax advice or to prepare any legal, accounting or tax documents. Client will rely on his or her tax attorney or accountant for tax advice or tax preparation. Clients must review the brokerage statements, transaction confirmations, or transaction statements, and tax reporting forms provided by the Meitav Dash Trade Ltd. or Israel Brokerage and Investment Ltd and Wise Money Israel for tax-related information.

- **Self-Managed Account Program Clients:** Wise Money Israel Sole Proprietorship DBA for Evan Liberman Sole Proprietorship, offers Self-Managed Account clients service for the preparation of a data report, an unofficial tax worksheet, which can be used by clients to prepare and report their local taxes. Wise Money Israel reviews each Self-Managed Account clients' investment account data and develops the data report.

This service is paid and conducted through Wise Money Israel Sole Proprietorship. The client is under no obligation to engage Wise Money Israel Sole Proprietorship for this service or to utilize this data in the preparation of their local tax report.

Wise Money Israel Sole Proprietorship DBA for Evan Liberman Sole Proprietorship is not qualified to, and does not purport to provide, any legal, accounting, estate, actuary, or tax advice or to prepare any legal, accounting or tax documents. Client will rely on his or her tax attorney or accountant for tax advice or tax preparation. Clients must to review the brokerage statements, transaction confirmations and tax reporting forms provided by the Meitav Dash or IBI and Wise Money Israel for tax-related information.

Information related to tax and legal consequences that is provided as part of the Data Report for Client Tax Preparation is for informative purposes only and should not be considered

tax or legal advice. Clients should contact their tax and/or legal advisor for personalized advice.

INVESTMENT CONSULTING.

Wise Money Israel offers Investment consulting on an hourly basis to clients in need of additional information to create their own initial portfolio. Investment consulting services are provided on an hourly basis, allowing clients to discuss their current or future investment portfolio on a general basis. Clients will receive an understanding of the Israeli capital market, current market conditions and performance, and tools in which to construct their own portfolio.

Investment Advising does not replace the one-time initial Portfolio Creation service (purchased individually or as part of the Silver/Gold Level services), that provides a new Self-Managed Account client a complete breakdown of suggested financial assets to purchase (diversified Exchange Traded Funds tracking market indices), including amounts, projected upside-downside, annual yields projections, expected cashflow, detailed ETF information and more.

This service is not a replacement for full portfolio management (which is the Premium Account Program). This service does not assist clients that wish to actively manage their self-managed accounts that incorporates individual securities. Wise Money Israel's individual stock/bond research, portfolio composition, and securities recommendations are only offered to Premium Accounts. If the client elects to act on any of our recommendations, the client is under no obligation to effect their transactions through our firm.

EDUCATIONAL SEMINARS/WORKSHOPS.

Wise Money Israel offers educational seminars to the public. Workshops are always offered on an impersonal basis and do not focus on the individual needs of the participants.

WISE MONEY ISRAEL WEBSITE.

The content of the Wise Money Israel website at <https://www.wisemoneyisrael.com/> performance analysis and rankings is provided as general and impersonalized investment information and commentary, and does not constitute a specific recommendation or solicitation that anyone should purchase or sell any particular security, investment advisory service, or third-party service provider.

WRAP FEE PROGRAMS.

Wise Money Israel does not participate in any wrap fee programs.

Important Note: It is the client's responsibility to ensure that Wise Money Israel is promptly notified if there are ever any significant changes to their financial situation, goals, objectives or needs so we can review our previous recommendations and make any necessary adjustments.

Item 5 Fees and Compensation

ADVISORY FEES

The following information describes how Wise Money Israel is compensated for the advisory services we provide to our clients. The specific manner in which fees are charged and the compensation we receive may differ between clients depending upon the individual Engagement Agreement with each client. Wise Money Israel reserves the right to negotiate our compensation with clients depending on the scope of our advisory relationship, and we may charge higher or lower fees than are available from other firms for comparable services. Wise Money Israel has the general discretion to waive all or a portion of our fees, but typically only exercises this discretion for our employees.

PREMIUM ACCOUNT PROGRAM.

- I. Investment Management Fees.** In consideration for providing investment management services and pursuant to the Engagement Agreement with the client, Wise Money Israel charges Premium Account clients an annual asset-based fee equal to **1.35 %** based on the client's assets under management ("AUM") as valued by the custodian.

Fees are negotiated with each client based on a variety of factors, such as the amount of assets being managed, future deposits to the accounts under our management, the level and type of services provided and/or the nature of the relationship with the client.

Wise Money Israel bills our fees to US clients on a quarterly basis in arrears. Wise Money Israel bills our fees to non-US clients on a monthly basis in arrears. Clients must authorize the deduction of our fees from their managed accounts by the qualified custodian and choose the method by which our fees will be calculated. For accounts held with the custodian Meitav Dash Trade Ltd., our firm will instruct the custodian how much to deduct based on the fees agreed to by the client.

For accounts held at Meitav Dash Trade Ltd., Wise Money Israel will calculate the management fees. The management fee calculations are reported to Meitav Dash Trade Ltd., who then deducts the management fee(s) from the clients' account(s). For accounts held at all other qualified custodians, the qualified custodian will calculate management fees. These fees will be deducted from their accounts. All fees will be supported by an invoice to the client itemizing the fee.

SELF-MANAGED ACCOUNT PROGRAM.

- I. Account Opening Services and Investment Management Fees.** In consideration for providing account opening and investment management services and pursuant to the Engagement Agreement with the client, Wise Money Israel charges Self-Managed Account clients a one-time flat fee based on the following fee schedule:

Self-Managed Account Services	
Account Tier	Flat Fee
Bronze*	\$125
Silver	\$295
Gold	\$365

* The Bronze Level service is offered only to non-U.S. persons, and is conducted through Wise Money Israel Sole Proprietorship, a DBA for Evan Liberman Sole Proprietorship. The flat fee for the Bronze Level Account services is paid directly to Wise Money Israel Sole Proprietorship, a DBA for Evan Liberman Sole Proprietorship.

ADDITIONAL SERVICES.

Clients can purchase following services individually on an ad hoc basis. Additional services are not offered on an on-going basis. Clients must re-engage Wise Money Israel for each of the following services. Wise Money Israel charges the following flat fee(s) for our Additional Services:

Fees for Additional Services	
Service	Flat Fee
Portfolio Creation	\$180
Buying and Selling Securities	\$90
Portfolio Creation and Initial Securities Purchasing	\$270
Additional Funds Allocation	\$150

Fees for our additional services are charged in advance and billed separately as unique services. We shall under no circumstances require a prepayment of more than \$1,200 in advance when services cannot be rendered within six (6) months. Please see Item 4 (Advisory Programs – Additional Services), of this brochure for more information on our Additional Services.

DATA REPORT FOR CLIENT TAX PREPARATION.

- **U.S. Clients.** U.S. clients are provided with certain tax reports directly from their selected U.S. broker-dealer.
- **Non-U.S. Clients.**
 - **Premium Account Program Clients:** Wise Money Israel Ltd. does not charge Premium clients a fee for the generation of the data report for client tax preparation.

- **Self-Managed Account Program Clients:** Wise Money Israel Sole Proprietorship DBA for Evan Liberman Sole Proprietorship charges a flat fee of \$90. The fee for our data report for tax preparation service is billed separately as unique service by Wise Money Israel Sole Proprietorship.

INVESTMENT CONSULTING.

We charge an hourly fee of \$90 an hour for our investment consulting service. Our investment consulting fee is invoiced to the Client in advance and due to Adviser within thirty (30) days of the invoice date. Investment consulting services will be considered to be complete upon the end of the meeting. The client prepays via Wise Money Israel's website for the amount of hours the advisor estimates will be spent on the consultation. If Wise Money Israel does not meet that hourly estimate, Wise Money Israel will refund the client the excess. Our investment consulting fee is billed separately as unique service.

EDUCATIONAL SEMINARS/WORKSHOPS.

Wise Money Israel does not charge a fee for speaking engagements.

ADDITIONAL FEES AND EXPENSES.

Clients will incur transaction charges and/or brokerage fees when purchasing or selling securities. These charges and fees are typically imposed by the broker-dealer or qualified custodian through which account transactions are executed. For more information on our brokerage practices, please refer to Item 12 (Brokerage Practices) of this Brochure.

The fees that clients pay to our firm for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and/or exchange traded funds (described in each fund's prospectus) to their shareholders. The fees charged directly by mutual funds and exchange traded funds will typically include a management fee and other fund expenses.

To fully understand the total costs associated with their investment portfolio, clients should review all the fees charged by mutual funds, exchange traded funds, our firm, and others.

TERMINATION. The Engagement Agreement with our clients may be terminated by either party at any time upon thirty (30) days written notice. Upon termination of our status as the client's investment adviser, Wise Money Israel will not take any further action with respect to the client's account(s) unless specifically notified by the client in writing. Clients will be responsible for instructing their custodian and monitoring their account for the final disposition of assets.

REFUNDS. Fees paid in advance are considered earned and non-refundable up to the effective date of the termination of Engagement Agreement. Upon receipt of a proper notice of termination from

the client, as described in the Engagement Agreement, any earned unpaid fees will be billed on a pro-rata basis based on the amount of work performed by us up to the point of termination.

ERISA ACCOUNTS. Wise Money Israel is deemed to be a fiduciary to advisory clients that are employee benefit plans or individual retirement accounts (IRAs) pursuant to the Employee Retirement Income and Securities Act ("ERISA"), and regulations under the Internal Revenue Code of 1986 (the "Code"), respectively. As such, our firm is subject to specific duties and obligations under ERISA and the Internal Revenue Code that include among other things, restrictions concerning certain forms of compensation. To avoid engaging in prohibited transactions, Wise Money Israel may only charge fees for investment advice about products for which our firm and/or our related persons do not receive any commissions or 12b-1 fees, or conversely, investment advice about products for which our firm and/or our related persons receive commissions or 12b-1 fees, however, only when such fees are used to offset Wise Money Israel's advisory fees.

Any material conflicts of interest between clients and Wise Money Israel or our employees are disclosed in this Brochure. If at any time, additional material conflicts of interest develop, Wise Money Israel will provide our clients with a written notification of those material conflicts of interest or an updated Brochure.

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

PERFORMANCE BASED FEES

Wise Money Israel does not charge our clients fees based on a share of capital gains on or capital appreciation of the assets in their accounts.

Item 7 Types of Clients

TYPES OF CLIENTS

Wise Money Israel offers investment advisory services to a diversified group of clients including individuals, high net worth individuals, trusts, estates, pension, and profit-sharing plans (other than plan participants), charitable/non-profit organizations, corporations, and other business entities. Client relationships may vary in scope and length of service.

ACCOUNT REQUIREMENTS

Wise Money Israel generally requires a minimum account balance of \$100,000 for our Premium Account services and \$5,000 for our Self-Managed Account services.

However, Wise Money Israel in its sole discretion may waive or lower our minimum account balance requirement based on various criteria (i.e., anticipated future additional assets to be managed, related accounts, account composition, negotiations with the client, etc.).

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

METHODS OF ANALYSIS

The securities analysis methods employed by Wise Money Israel may include fundamental analysis, technical analysis, and economic analysis.

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. The fundamental analysis of a business involves analyzing its financial statements and health, management and competitive advantages, and competitors in the market. Fundamental analysis maintains that markets may misprice a security in the short run, but that the correct price will eventually be reached by the market.

Technical Analysis generally tries to predict future price movements based on historical price and volume information. Wise Money Israel also uses several technical analysis tools and methods to help determine price movement, support and resistance levels, trends, and trend lines, moving averages, volatility, trade volume, relative strength, and other technical indicators to identify common patterns and to determine preferred timing to buy/sell securities.

Economic Analysis. Wise Money Israel tracks economic developments that may have an effect both on the overall global and Israeli market, but also on securities held by our clients. This includes interest rate changes, unemployment level changes, balance of payments and debt level changes, currency balances and exchange rate changes, GDP growth rates, government-to-GDP det levels, balance of payments, credit rating, inflation, and other economic data.

Our main sources of information include internal research, financial websites, research materials prepared by others, corporate rating services, timing services, annual reports, prospectuses, filings with the SEC and other regulatory agencies, and company press releases.

Our methods rely on the assumption that the companies whose securities we purchase and sell, the rating agencies that review these securities, and other publicly-available sources of information about these securities, are providing accurate and unbiased data. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

INVESTMENT STRATEGIES

Wise Money Israel tailors its investment strategy based on the client needs and circumstances. We discuss with the client their mid- to long-term investment objectives and risk tolerance as well as

any potential investment restrictions and liquidity needs, and then plan a strategy and asset allocation suitable to their needs and risk tolerance.

Investments include, but are not limited to Israeli stocks, bonds, and ETFs. The goal of each client's investment strategy is to maximize total return over the mid- to long-term, while balancing the client's needs for the stability of sustainable fixed income against their desire for capital growth. This balance largely depends on the risk tolerance of the client.

Wise Money Israel will tend to invest, as a percentage of assets under management, heavily in the Israeli public stock and bond markets denominated in Israeli currency. These markets provide opportunity and diversification but also expose the portfolio to country and currency risk. The value of a foreign investment can be adversely impacted by the situation associated with its home country. The value of a foreign investment can be adversely impacted by changes in the currency's exchange rate with respect to the US Dollar.

As market conditions for Israeli stocks and sectors change, and individual stocks under- or overperform the market or our expectations, we tend to rotate into new investments that we believe have more favorable long-term potential. We tend to hold Israeli corporate bonds to maturity but may rotate out of certain bonds as market conditions and the interest rate environment change.

Wise Money Israel uses a proprietary mix of fundamental, technical analysis and screening to determine relative investment value when selecting investments for client accounts. Our primary selection driver is fundamental analysis involving the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

Wise Money Israel primarily selects direct investments in individual Israeli public equities (stocks) and debt instruments (bonds).

Wise Money Israel performs its own securities research in Israeli stocks and bonds using research tools and portfolio management software. We also take input from other professional external works of analysis. During security selection, Wise Money Israel focuses primarily, but not exclusively, on macroeconomic factors, industry factors, finding growing and promising sectors and companies in the Israel capital market based on their profitability, revenue growth, corporate cash flow, Return on Equity, debt levels, SWOT analysis and technical analysis. For bond selection, we additionally consider Bond Duration, Yield to Maturity, debt schedule, credit rating and outlook, sector diversification and bond collateralization.

Additionally, Wise Money Israel performs ethical screening of securities.

Wise Money Israel attempts to keep the level of risk in line with normal market fluctuation through dynamic asset allocation within client guidelines and wide sector and risk level diversification.

Transactional costs should not be a significant source of capital risk since our investment strategies tend to be buy-and-hold in nature.

RISK OF LOSS

Any investment carries a certain degree of risk, including a possible loss of principal that clients should be prepared to bear. The value of securities used in all of our strategies may go up or down in response to factors not within our control, such as but not limited to, the status of an individual company underlying a security, or the general economic climate. There is no guarantee that any of the investment strategies that our firm employs will outperform the investment strategies used by other firms. Past performance is no guarantee of future results.

Risk management is integrated into our process through the use of appropriate risk levels on each position, diversified allocation between assets and strategies, and when appropriate, limiting the risk of extreme market moves through hedges.

The investment risks described below may not be all-inclusive but should be considered carefully:

In addition to risks related to securities analysis, there are specific risks inherent to the types of securities our firm invests in. Our firm may invest in domestic and foreign equities, exchange traded funds, and fixed income, all of which may carry a variety of risks, as set forth here:

EQUITIES. Equity, such as common stocks, represents ownership interest of the issuer. Equities can decline in value over short or extended periods as a result of changes in a company's financial condition, changes in the overall market, and economic and political conditions. Political risk may be of higher concern for foreign equities. Adverse changes in exchange rates may also lower returns on foreign equities.

FIXED INCOME. Fixed income securities pay a predetermined amount of cash by the issuer to the security holder. A risk associated with fixed income is that the issuer may not be able to make interest and principal payments when due. Generally, the lower the credit rating of a security, the greater is the risk that the issuer will default on its obligation. If a rating agency gives a debt security a lower rating, the value of the debt security will decline because investors will demand a higher rate of return. As nominal interest rates rise, the value of fixed income securities is likely to decrease. The amount of decrease is more pronounced for higher duration fixed-income (i.e. those making payments farther in the future). Higher duration fixed-income will also typically exhibit higher price volatility. A nominal interest rate is the sum of a real interest rate and an expected inflation rate, and as such, for fixed real rates, rising inflation may lower the value of fixed income securities in addition to eroding the purchasing power of the fixed payments.

EXCHANGE TRADED FUNDS. Exchange-traded funds ("ETFs") are a type of index fund bought and sold on a securities exchange. The risks of owning an ETF generally reflect the risks of owning the underlying securities they are designed to track, although lack of liquidity in an ETF could result in it being more volatile and ETFs have management fees that increase their costs. ETFs are also subject to other risks, including: (i) the risk that their prices may not correlate perfectly with changes in the underlying index; and (ii) the risk of possible trading halts due to market conditions or other reasons that, in the view of the exchange upon which an ETF trades, would make trading in the ETF inadvisable. Wise Money Israel may invest in ETFs with underlying securities in equity, fixed income (short and long duration), options, and foreign currencies. Some of the risks

associated with these securities have been noted above. In addition, Wise Money Israel may invest in ETFs having commodities and precious metals, or futures of these, as underlying securities. Risks with these assets are described in more detail below.

MUTUAL FUNDS. Below is a list of some of the risks to consider when investing in mutual funds. Note, the following risks associated with mutual funds reflect the risks of the underlying securities held by 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.

Other risks with investing may include any of the following:

ASSET CLASS RISK. An asset class is a group of securities that exhibits similar characteristics, behave similarly in the marketplace and is subject to the same laws and regulations. Two main asset classes are equities, or stocks and fixed income, or bonds. Each asset class is expected to reflect different risk and return investment characteristics and performs differently in any given market environment. Asset class investing attempts to capture the performance of a specific market segment. Different asset classes have different cash flows streams and varying degrees of risk. Securities in specific asset classes in client 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 Wise Money Israel recommends portfolio allocations that are concentrated in a particular market, industry or asset class, your portfolio may be susceptible to loss due to adverse occurrences affecting that market, industry, or asset class.

COUNTRY RISK. To the extent that Wise Money Israel recommends portfolio allocations that are concentrated in Israel, a political or security situation, rising inflation or government default, or a natural disaster affecting Israel may weaken the Israeli economy and cause Israeli investments to decline.

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

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 may be more volatile than those of other types of investments. Growth securities typically do not pay a dividend, which may help cushion stock prices in market downturns and reduce potential losses.

INDUSTRY RISK. The possibility that prices of stocks in a particular industry will decrease because of economic and other factors specific to that industry (such as a regulatory change affecting that industry)

INFLATION RISK. The possibility that inflation (price increase in goods and services in an economy, as measured by the Consumer Price Index) will undermine an investment’s return through a decline in purchase power (reducing or eliminating real inflation-adjusted returns).

ISSUER RISK. Your account’s performance depends on the performance of individual securities in which your account invests. Any issuers may perform poorly, causing the value of its securities to decline. Poor performance may be 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 may cause the value of the securities to decline.

LARGER COMPANY SECURITIES RISK. Securities of companies with larger market capitalizations may 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 may be unable to grow at rates higher than the fastest growing smaller companies, especially during extended periods of economic expansion.

LIQUIDITY RISK. A security may not be easily bought or sold in a timely manner due to a large spread between buyers prices and sellers prices, and desire not to adversely affecting the price by “settling” for a less-than-optimal price.

MARKET RISK. Your account could lose money over short periods due to short-term market movements and over longer periods during market downturns. The value of a security may decline 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 may be negatively affected.

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

PRINCIPAL RISK. The risk of losing money from the original amount invested.

REGULATORY RISK. Changes in government regulations may 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 may 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 can perform differently from the market as a whole and from other types of stocks. Value stocks may be purchased based upon the belief that a given security may be 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 may increase in value more quickly during periods of anticipated economic upturn, they may 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 may not have sufficient resources to continue as ongoing businesses, which would result in the stock of such companies potentially becoming worthless.

Investors should be aware that their investment is not guaranteed and understand that there is a risk of loss of value in their investment.

Item 9 Disciplinary Information

REQUIRED DISCLOSURES

Our firm and our management persons have not been involved in any legal or disciplinary events that would have a material adverse effect on the integrity of our management or the services we provide to our clients.

Item 10 Other Financial Industry Activities and Affiliations

OUTSIDE BUSINESS ACTIVITIES

Neither Wise Money Israel nor any of its employees are registered, or have an application pending to register, as a broker-dealer or registered representative of a broker-dealer, futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

AFFILIATED ENTITIES

Wise Money Israel Ltd. has relationships or arrangements with the following affiliated entities that may create a potential conflict of interest:

EVAN LIBERMAN SOLE PROPRIETORSHIP DBA WISE MONEY ISRAEL SOLE PROPRIETORSHIP.
Wise Money Israel Sole Proprietorship DBA for Evan Liberman Sole Proprietorship is affiliated with our firm through common control and ownership by Evan Liberman.

Bronze level Self-Managed Account Program clients and Self-Managed Account Clients Data Report for Client Tax Preparation service are conducted through Wise Money Israel Sole Proprietorship. Any compensation for data reporting for client tax preparation services and Bronze Self-Managed Account services is paid directly to Wise Money Israel Sole Proprietorship.

Wise Money Israel Sole Proprietorship DBA for Evan Liberman Sole Proprietorship receives a flat-fee of \$84 by referring eligible clients to Meitav Dash Trade Ltd for referrals of Israeli investors who open their own account with Meitav Dash. This creates a conflict of interest in that Wise Money Israel Ltd. has a financial incentive to require advisory clients open accounts at Meitav Dash as a result of referral fees paid by Meitav Dash to Wise Money Israel Sole Proprietorship.

Any compensation for referrals is paid directly to Wise Money Israel Sole Proprietorship.

OTHER INVESTMENT ADVISERS

Certain third-party investment advisers may act as a solicitor for Wise Money Israel and for these services receives a one-time referral fee equal to the first three months of the management fee Wise Money Israel charges to the client. All fees third-party investment advisers may receive from Wise Money Israel and the written separate disclosures made to clients regarding these fees comply with all applicable federal and/or state statutes and rules. The written disclosures clients are provided with include a copy of the Wise Money Israel's Form ADV Part 2A and any relevant brochures, a disclosure statement detailing the fees third-party investment advisers acting as solicitors may be paid and a copy of Wise Money Israel's privacy policy.

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

CODE OF ETHICS

Wise Money Israel has adopted a Code of Ethics (the "Code") that sets forth a standard of business conduct for our firm and all our associated persons. The purpose of the Code is to set out ideals for integrity, objectivity, competence, fairness, confidentiality, professionalism and diligence for our firm and our associated persons to espouse in the interest of our clients and investor protection. The Code includes provisions relating to the confidentiality of client information, a prohibition on insider trading, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All employees of Wise Money Israel are required to handle their personal securities transactions in such a manner as to avoid any actual or potential conflicts of interest or any abuse of position of trust and responsibility. Annually, we require all employees to certify that they have read, understand, and will comply with the Code.

Clients and prospective clients may request a full copy of our firm's Code of Ethics by contacting our firm in writing at info@wisemoneyisrael.com and/or Wise Money Israel Ltd, 6 HaMelacha Street, Binyamina Israel, 3057319 or calling our firm at +972-54-793-1830.

PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS

Wise Money Israel and/or our advisors may invest in the same securities that are recommended to and/or purchased for our clients. Wise Money Israel and/or our advisors do not recommend securities to our clients in which Wise Money Israel and/or our advisors has a material financial interest. Wise Money Israel has adopted procedures designed to assure that the personal securities transactions, activities and interests of Wise Money Israel and/or our advisors will not interfere with our ability to make investment decisions in the best interest of our clients.

PERSONAL TRADING

Wise Money Israel maintains and enforces written policies and procedures reasonably designed to prevent the misuse of material non-public information by our firm or any access persons of our firm with regards to their personal securities transactions. Personal trading activities are continually monitored to reasonably prevent conflicts of interest between our firm and our clients.

Item 12 Brokerage Practices

SELECTION OF BROKER-DEALERS

Securities transactions for U.S. clients are generally executed through Interactive Brokers, LLC (“Interactive Brokers”), member FINRA/SIPC/NYSE. Interactive Brokers maintains custody of our U.S. clients’ assets and effects securities transactions for our investment management clients’ accounts.

Securities transactions for non-U.S. clients are generally executed through Meitav Dash Trade Ltd (“Meitav Dash”), an Israeli brokerage and Tel Aviv Stock Exchange member firm or Israel Brokerage and Investments – IBI Ltd (“IBI”), both of which are Tel Aviv Stock Exchange Member brokerage firm custodians in Israel. Meitav Dash and/or IBI maintain custody of our non-U.S. clients’ assets and effects securities transactions for our investment management clients’ accounts.

Securities transactions for Self-Directed IRA account holders with Advanta IRA are generally executed through Meitav Dash Trade Ltd (“Meitav Dash”), an Israeli brokerage and Tel Aviv Stock Exchange member firm. Mainstar Trust maintains custody of our IRA client assets. Please refer to Item 15 (*Custody*) for more information on Mainstar Trust.

Wise Money Israel is independently owned and operated and is not affiliated with or a related person of Interactive Brokers, Meitav Dash, or IBI.

Wise Money Israel considers a number of factors prior to recommending a particular brokerage firm to our clients, including but not limited to, their familiarity with the securities to be sold or purchased, their execution skills, order-flow capabilities, their commission rates or other fee schedules, their custodial services, their level of net capital (financial strength) and excess SIPC and other insurance coverage. The commissions charged by Interactive Brokers are competitive with similarly situated retail broker-dealers offering the same variety of securities to clients. Clients are advised, however, that they may be able to effect transactions in securities through other broker-dealers at lower commission rates, particularly with respect to securities listed on a national securities exchange or in the over-the-counter market.

RESEARCH AND OTHER SOFT DOLLAR BENEFITS. Our custodians offer products or services other than execution that assist our firm in managing and administering client accounts. These may include software and other technology that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts), facilitate payment of our fees from clients’ accounts, and assist with back office functions, record keeping and client reporting. These services may be

used to service all or a substantial number of client accounts, including accounts not maintained at Interactive Brokers.

Wise Money Israel may also receive services from our custodians or its affiliates that are intended to help our firm manage and further develop our business. These services may include registration support through Greenwich Compliance, website design and technology support. One of our custodians, Interactive Brokers, also has arrangements with various product vendors, which enable our firm to purchase their products at a discount. These products may include such items as: client reporting and consolidated statement software; client communication software; client relationship management software; compliance assistance; investment research.

Wise Money Israel does not participate in any commission-sharing arrangements with our U.S. custodian (Interactive Brokers) or receive soft dollar credits. Wise Money Israel does participate in commission-sharing arrangement with our Israeli custodians (Meitav and IBI) as permitted under Israeli law. For more information on brokerage commission sharing please refer to Item 5 (Fees and Compensation) of this brochure. While the benefits we receive from our custodians do not depend on the amount of brokerage transactions directed to them, as a fiduciary, we are required to disclose that there is an inherent conflict of interest when our firm recommends that clients maintain their assets at a particular custodian. These recommendations may be based in part on the benefits we receive from that custodian, such as the availability of the abovementioned products and services, and not solely on our clients' interest in receiving most favorable execution. Nonetheless, we seek to ensure that the securities transactions effected for our clients represent the best qualitative execution, not just the lowest possible cost.

Our firm routinely compares order execution disclosure information and Exchange coverage at our custodians to other broker-dealers/custodians to ensure that our custodians remain competitive in providing best execution for our clients' securities transactions. Although the brokerage commissions and/or transaction fees charged by our custodians may be higher or lower than those charged by other broker-dealers/custodians, in seeking best execution for our clients our firm strives to ensure that our clients pay brokerage commissions and/or transactions fees which we have determined, in good faith, to be reasonable in relation to the value of the brokerage and other services provided by that custodian.

BROKERAGE INCENTIVE FEE ACCOUNT REFERRALS.

- **U.S. Brokerage Firms/Custodians.** Wise Money Israel does not consider broker-dealer or third-party referrals in selecting or recommending broker-dealers to our U.S. clients as this would create a conflict of interest.
- **Non-U.S. Brokerage Firms/Custodians.** For non-U.S. clients, Wise Money Israel does consider brokerage referrals in the selection of brokerage firms. For accounts held at non-U.S. custodians Meitav Dash Trade Ltd or Israel Brokerage and Investments – IBI Ltd, Wise Money Israel Ltd and Wise Money Israel Sole Proprietorship receive a portion of trade commission fees charged to clients by the custodian(s).

- **Wise Money Israel Ltd.** For accounts held at non-U.S. custodians Meitav Dash Trade Ltd or Israel Brokerage and Investments – IBI Ltd, Wise Money Israel Ltd. receives the following percentage of trade commission fees charged to Wise Money Israel Ltd.’s Premium, Gold and Silver clients by the custodian:
 - 50% for securities traded in Israel
 - 20% for securities traded outside of Israel

This creates a conflict of interest in that Wise Money Israel Ltd. has a financial incentive to require advisory clients open accounts at Meitav Dash or IBI Ltd. as a result of fees paid by Meitav Dash to Wise Money Ltd. Additionally, a conflict of interest exists in that Wise Money Ltd. receives compensation based on the volume of trades executed in client accounts at Meitav Dash or IBI in that Wise Money Israel has an incentive to recommend and/or engage in inappropriate or excessive trading for client accounts in an effort to maximize the commission fees charged by Meitav Dash or IBI in disregard of the interests of the customer.

- **Wise Money Israel Sole Proprietorship.** For accounts held at non-U.S. custodians Meitav Dash Trade Ltd, Wise Money Israel Sole Proprietorship DBA Evan Liberman Sole Proprietorship receives the following percentage of trade commission fees charged to Wise Money Israel Sole Proprietorship’s Bronze Self-Managed account clients:
 - 50% for securities traded in Israel
 - 20% for securities traded outside of Israel

This creates a conflict of interest in that Wise Money Israel Sole Proprietorship has a financial incentive to recommend advisory clients open accounts at Meitav Dash as a result of fees paid by Meitav Dash to Wise Money Israel Sole Proprietorship.

DIRECTED BROKERAGE. Generally, Wise Money Israel recommends that our clients direct transactions through certain brokerage firms. However, in certain circumstances Wise Money Israel requires clients direct transactions through the following broker-dealers:

- For all clients that wish Wise Money Israel to manage their IRA accounts, our firm requires clients open accounts with Advanta IRA.
- For all non-U.S. clients, our firm requires clients open accounts with Meitav Dash or IBI.

We ultimately do not have discretionary authority to determine the broker-dealer to be used for the purchase or sale of securities for client accounts or the commission rates paid to a broker-dealer for client securities transactions.

In rare cases, Wise Money Israel may utilize other broker-dealers when requested by the client. Clients of Wise Money Israel must be aware that if they direct us to use a particular broker-dealer that it may limit our ability to achieve best execution or limit their participation in block trading. As a result, clients may pay higher commissions, have higher transaction costs, or receive less favorable prices. In situations where the client directs us to effect their transactions through a particular broker-dealer, we require such directions to be in writing.

TRADE AGGREGATION

Investment decisions deemed appropriate for one client may also be deemed appropriate for other clients so that the same security may be purchased or sold at or about the same time for more than one client. When this is the case our firm may, but is not obligated to, aggregate similar trades for multiple clients and execute the trade as a single block.

When transactions are so aggregated, the securities purchased or sold will be allocated in a fair and equitable manner. Our trade allocation procedures seek to allocate investment opportunities among our clients in the fairest possible way taking into account their best interests. These procedures ensure that allocations do not involve a practice of favoring or discriminating against any client or group of clients. Transactions are usually aggregated to seek a more advantageous net price and/or to obtain better execution for all clients. Nevertheless, there is no assurance that the aggregation of transactions will benefit all clients equally, and in some instances combined orders could adversely affect the price or volume of a security. Also, it is possible that we may not aggregate trades in circumstances where it would be beneficial to do so.

TRADE ERRORS

From time to time, our firm may make a trade error when servicing a client's account. When this occurs, we will correct the trade as soon as we discover the error. Trading errors will be corrected at no cost to clients. In most cases, we will correct trade errors via our executing broker-dealer's/custodian's trade error desk. If there is a cost associated with this correction, such cost is borne by Wise Money Israel and not the client. Note that we do not credit accounts for market losses unrelated to our error.

Item 13 Review of Accounts

ACCOUNT REVIEWS

Wise Money Israel conducts account reviews on at least a quarterly basis for clients subscribed to our Premium Account Program. The frequency of the review depends upon a variety of factors such as: the client's risk profile, activity in the account, economic and market conditions, and the client's preferences, if any. Additional reviews may be triggered by changes in the investment objectives or guidelines for a particular client or specific arrangements with the client.

Formal client review meetings are generally conducted on a regular basis at intervals mutually agreed upon by the advisor and the client, but no less than annually. During these reviews, any changes in the client's investment objectives are discussed so we can review our previous recommendations and make any necessary adjustments.

ACCOUNT REPORTS

Those clients to whom Wise Money Israel provides Premium investment management services receive quarterly reports from our firm summarizing their account(s) and investment results. Reports will be furnished electronically. Clients are urged to compare the account statements they receive from their custodian to any written reports received from our firm.

Clients have direct and continuous access to their account information and related documents via the password-protected website of the qualified custodian with which their accounts are held.

Item 14 Client Referrals and Other Compensation

CLIENT REFERRALS

Our firm pays referral fees (non-commission based) to foreign independent solicitors (non-registered representatives) for the referral of non-U.S. clients to our firm. Such referral fee is a flat fee equal to the first three months of the management fee Wise Money Israel charges to the client. This fee is paid for clients that sign up for the Premium Account Program, after the client has passed the three-month mark billing cycle.

This arrangement will not result in higher costs to the referred client. In this regard, our firm maintains Solicitors Agreements.

Wise Money Israel does not compensate U.S. third-parties (or “solicitors”) to promote the investment advisory services offered by our firm to potential U.S. clients, because the U.S. solicitor would have to satisfy requirements under Rule 206(4)-3 of the Advisers Act or similar state rules regarding solicitation arrangements before a cash referral fee could be paid to them.

It is our firm’s policy not to compensate clients for referring potential clients to our firm, because the client would be considered a solicitor and would have to satisfy requirements under Rule 206(4)-3 of the Advisers Act or similar state rules regarding solicitation arrangements before a cash referral fee could be paid to them.

OTHER COMPENSATION

Wise Money Israel does not receive an economic benefit from anyone who is not a client in exchange for our provision of investment advice or other advisory services.

Item 15 Custody

CUSTODY OF CLIENT FUNDS AND SECURITIES

The following qualified custodians provide services to Wise Money Israel’s clients:

INTERACTIVE BROKERS LLC.

For U.S. and Non-U.S. clients, Interactive Brokers LLC is a qualified custodian and maintains custody of client funds in separate brokerage account(s) for each client under the client’s name.

Wise Money Israel personnel may assist the client in preparing paperwork to open a new brokerage account at Interactive Brokers, but only the client is permitted to authorize, by their signature, the opening of the account. Interactive Brokers sends an account-opening letter to each client at their physical mailing address after the account is approved.

Clients can access daily, monthly and annual account statements as well as daily trade confirmations through a password protected portion of Interactive Brokers' website, www.interactivebrokers.com. Clients should also expect to receive quarterly account summaries from the qualified custodian by first-class mail. Clients should carefully review the account statements and summaries received from the qualified custodian(s) and compare such official custodial statements to any account reports provided by Wise Money Israel. Any client that does not receive an account statement or summary from the qualified custodian should call our firm immediately so that we can arrange to have another statement sent by the custodian.

Clients can also access information concerning their account(s) and access (and generally change) the settings for their brokerage account online on the Interactive Brokers website at www.interactivebrokers.com.

MAINSTAR TRUST.

Mainstar Trust, a U.S. Trust Company under the oversight of the office of the State Bank Commissioners of Kansas, serves as the primary qualified custodian for Advanta IRA, however, Wise Money Israel generally requires that Advanta IRA account clients utilizing our services request Advanta IRA utilize the custodial services of Meitav Dash Trade Ltd. Where IRA account clients choose to utilize the custodial services of Mainstar Trust, Mainstar maintains custody of client funds in separate accounts for each client under the client's name. Wise Money Israel personnel may assist the client in preparing paperwork to open a new Self-Directed IRA account at Advanta IRA but only the client is permitted to authorize, by their signature, the opening of the account. Advanta IRA sends an account-opening letter to each client at their physical mailing address after the account is approved.

Clients can view their IRA account through a password protected portion of <https://advantaira.com/>. Clients should expect to receive annual account summary from Advanta Self-Directed IRA.

Clients can also access information concerning their account(s) and access (and generally change) the settings for their Self-Direct IRA account online on the Advanta IRA website at <https://hwa-online.com/advanta/default.htm>.

MEITAV DASH TRADE LTD.

Meitav Dash Trade Ltd ("Meitav Dash"), an Israeli brokerage and Tel Aviv Stock Exchange member firm maintains custody of IRA clients and non-IRA client funds in separate brokerage account(s) for each client under the client's name.

For non-IRA clients, Wise Money Israel personnel may assist the client in preparing paperwork to open a new brokerage account at Meitav, but only the client is permitted to authorize, by their

signature, the opening of the account. Meitav sends an account-opening letter to each client at the client-authorized email address after the account is approved.

Clients may access monthly statements as well as view daily trade activity through a password protected website, <https://sparkmeitav.ordernet.co.il/en/>. Clients should also expect to receive monthly account summaries from the qualified custodian by first-class mail. Clients should carefully review the account statements and summaries received from the qualified custodian and compare such official custodial statements to any account reports provided by Wise Money Israel. Any client that does not receive an account statement or summary from the qualified custodian should call our firm immediately so that we can arrange to have another statement sent by the custodian.

For IRA clients, Wise Money Israel personnel may assist the client in preparing paperwork to open a new Self-Directed IRA account at Advanta IRA but only the client is permitted to authorize, by their signature, the opening of the account. Advanta IRA sends an account-opening letter to each client at their physical mailing address after the account is approved.

IRA Clients can view their IRA account through a password protected portion of <https://advantaira.com/>. Clients can access monthly account statements as well as trade confirmations through a password protected website: <https://sparkmeitav.ordernet.co.il/en/>. Clients should expect to receive monthly account summaries from the brokerage firm Meitav Dash Trade by first-class mail. Clients should expect to receive annual account summary from Advanta Self-Directed IRA.

Clients can also access information concerning their account(s) and access the settings for their brokerage account online on the Meitav website at <https://sparkmeitav.ordernet.co.il/en/>.

ISRAEL BROKERAGE AND INVESTMENTS LTD.

Israel Brokerage and Investments – IBI Ltd (“IBI”) IBI an Israeli brokerage and Tel Aviv Stock Exchange member firm maintains custody of client funds in separate brokerage account(s) for each client under the client’s name. Wise Money Israel personnel may assist the client in preparing paperwork to open a new brokerage account at IBI, but only the client is permitted to authorize, by their signature, the opening of the account. IBI sends an account-opening letter to each client at the client-authorized email address after the account is approved.

Clients may access monthly statements as well as view daily trade activity through a password protected website, <https://sparkibi.ordernet.co.il/en/>. Clients should also expect to receive monthly account summaries from the qualified custodian by first-class mail. Clients should carefully review the account statements and summaries received from the qualified custodian and compare such official custodial statements to any account reports provided by Wise Money Israel. Any client that does not receive an account statement or summary from the qualified custodian should call our firm immediately so that we can arrange to have another statement sent by the custodian.

Clients can also access information concerning their account(s) and access the settings for their brokerage account online on the IBI website at <https://sparkibi.ordernet.co.il/en/>.

Item 16 Investment Discretion

DISCRETIONARY AUTHORITY

Wise Money Israel manages only Premium Account client securities portfolios on a discretionary basis. Wise Money Israel is granted limited discretionary authority in writing by the client at the outset of the advisory relationship. This limited discretionary authorization gives Wise Money Israel the authority to manage the client's investment assets at our firm's sole discretion and without consulting with the client in advance, subject to the investment objectives, guidelines and restrictions set by the client. This authorization will remain in full force and effect until we receive a written termination notice of the Engagement Agreement from the client.

Wise Money Israel does not have discretionary authority to determine what broker-dealer/custodian to use or the amount of commissions that are charged by the broker-dealer or custodian.

Item 17 Voting Client Securities

AUTHORITY TO VOTE CLIENT PROXIES

Wise Money Israel does not accept authority from clients with respect to voting of proxies solicited by, or with respect to, the issuers of any securities held in client portfolios. The qualified custodian holding clients' assets will send all such proxy documents it receives to the client so that the client may take whatever action the client deems appropriate. Wise Money Israel does not offer clients any consulting assistance regarding proxy issues.

Item 18 Financial Information

REQUIRED DISCLOSURES

As previously discussed in this brochure, Wise Money Israel may accept limited discretionary authority when providing investment management services if agreed upon in writing with the client. Wise Money Israel does not require or solicit prepayment of fees from our Premium Account Program clients.

Wise Money Israel does not require the prepayment of more than \$1,200 in fees six or more months in advance.

Wise Money Israel has no financial commitments that would impair our firm's ability to meet our contractual and fiduciary commitments to our clients and has not been the subject of a bankruptcy proceeding.

Form ADV Part 2B: Brochure Supplement



**Wise Money Israel Ltd
6 HaMelacha Street,
Binyamina
Israel, 3057319**

www.wisemoneyisrael.com

This brochure supplement provides information about our supervised persons that supplements the Wise Money Israel Ltd brochure. You should have received a copy of that brochure. Please contact our firm if you did not receive Wise Money Israel Ltd.'s brochure or if you have any questions about the contents of this supplement.

Additional information about the supervised persons mentioned in this brochure supplement is available on the SEC's website at www.adviserinfo.sec.gov.

Effective Date: July 29, 2019

SUPERVISED PERSONS: Evan Liberman

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Name: Evan Jay Liberman

Year of Birth: 1968

Education: B.S.; 1991
University of California
Santa Barbara, CA

Portfolio Management; 2012
Megamot Financial College
Petach Tikvah

Experience: Chief Executive Officer
Wise Money Israel Ltd
July 2017 – Present

Self-Employed
Wise Money Israel Sole Proprietorship, a DBA for Evan Liberman Sole
Proprietorship
May 2010 – Present

DISCIPLINARY INFORMATION

Mr. Liberman has not been involved in any legal or disciplinary events that would be material to a client's or prospective client's evaluation of the integrity of our management.

OTHER BUSINESS ACTIVITIES

Please refer to Item 10 of this Brochure for more information.

ADDITIONAL COMPENSATION

Mr. Liberman does not receive any additional compensation, apart from his regular salary and bonuses, that is based, all or in part, on the number or amount of sales, client referrals, or new accounts. Mr. Liberman does not receive any economic benefit from anyone who is not a client for providing advisory services.

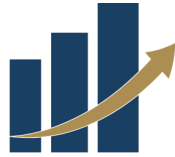
SUPERVISION

Mr. Liberman is the sole principal and Chief Compliance Officer (“CCO”) of our firm and as such has no internal supervision placed over him. He is, however, bound by our firm’s Code of Ethics. The CCO may be contacted at +972-54-793-1830 or by email at evan@wisemoneyisrael.com.

REQUIREMENTS FOR STATE-REGISTERED ADVISERS

Mr. Liberman has not been involved or been found liable in any arbitration claims alleging damages in excess of \$2,500, in any civil, self-regulatory organization, or administration proceeding, or been subject of any bankruptcy petition.

Form ADV Part 2B: Brochure Supplement



WISE MONEY ISRAEL

— CAPITAL INVESTMENTS —

Wise Money Israel Ltd
6 HaMelacha Street,
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Israel, 3057319

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Effective Date: July 29, 2019

SUPERVISED PERSONS: Stefan Silver

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Name: Stefan Silver

Year of Birth: 1984

Education: MBA; 2015
Haifa University
Haifa, Israel

Economics and Management; 2011
The Open University of Israel
Israel

Experience: Director of Operations & Business Development
Wise Money Israel Ltd
Mar. 2016 – Present

Director of Operations & Business Development
Wise Money Israel Sole Proprietorship, a DBA for Evan Liberman Sole
Proprietorship
Mar. 2016 – July 2017

Organizational Coordinator
Kerem-El (NGO)
Mar. 2016 – Present

Project Manager
Derech-El (NGO)
June 2013 – Feb. 2016

Investor relations
Or Báretz (NGO)
Jan. 2011 – June 2013

DISCIPLINARY INFORMATION

Mr. Silver has not been involved in any legal or disciplinary events that would be material to a client's or prospective client's evaluation of the integrity of our management.

OTHER BUSINESS ACTIVITIES

Mr. Stefan Silver, in his individual capacity, serves as a volunteer board member for Maoz Tzur Israel (NGO). Mr. Silver spends approximately 0 hours a month of his time on this activity.

ADDITIONAL COMPENSATION

Mr. Silver does not receive any additional compensation, apart from his regular salary and bonuses, that is based, all or in part, on the number or amount of sales, client referrals, or new accounts. Mr. Silver does not receive any economic benefit from anyone who is not a client for providing advisory services.

SUPERVISION

The Chief Compliance Officer (“CCO”), Mr. Liberman, supervises and monitors the advisory and personal trading activities of all supervised persons for compliance with federal and/or state securities laws. The CCO may be contacted at +972-54-793-1830 or by email at evan@wisemoneyisrael.com.

REQUIREMENTS FOR STATE-REGISTERED ADVISERS

Mr. Silver has not been involved or been found liable in any arbitration claims alleging damages in excess of \$2,500, in any civil, self-regulatory organization, or administration proceeding, or been subject of any bankruptcy petition.

Form ADV Part 2B: Brochure Supplement



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Effective Date: July 29, 2019

SUPERVISED PERSONS: Ihor Pletenets

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Name: Ihor Pletenets

Year of Birth: 1980

Education: B.A. Hons Accounting and Finance; 2010
West London University
London, U.K.

Experience: Client Relations Manager
Wise Money Israel Ltd
Aug. 2017 – Present

Technical Analyst
Fat Prophets
Jan. 2011 – May 2016

DISCIPLINARY INFORMATION

Mr. Pletenets has not been involved in any legal or disciplinary events that would be material to a client's or prospective client's evaluation of the integrity of our management.

OTHER BUSINESS ACTIVITIES

Please refer to Item 10 of this Brochure for more information.

ADDITIONAL COMPENSATION

Mr. Pletenets does not receive any additional compensation, apart from his regular salary and bonuses, that is based, all or in part, on the number or amount of sales, client referrals, or new accounts. Mr. Pletenets does not receive any economic benefit from anyone who is not a client for providing advisory services.

SUPERVISION

The Chief Compliance Officer ("CCO"), Mr. Liberman, supervises and monitors the advisory and personal trading activities of all supervised persons for compliance with federal and/or state securities laws. The CCO may be contacted at +972-54-793-1830 or by email at evan@wisemoneyisrael.com.

REQUIREMENTS FOR STATE-REGISTERED ADVISERS

Mr. Pletenets has not been involved or been found liable in any arbitration claims alleging damages in excess of \$2,500, in any civil, self-regulatory organization, or administration proceeding, or been subject of any bankruptcy petition.