

**Item 1. Introduction**

VestWealth Inc. and Northbound Securities LLC are affiliated firms.

Northbound Securities LLC. is registered with the U.S. Securities and Exchange Commission ([SEC](#)) as a broker-dealer and is a member of the Financial Industry Regulatory Authority ([FINRA](#)) and the Securities Investor Protection Corporation ([SIPC](#)).

VestWealth, Inc. is an investment adviser registered with the [SEC](#).

Brokerage and investment advisory services and fees differ and it is important for you to understand these differences.

Free and simple tools are available to research firms and financial professionals at [investor.gov/CRS](#), which also provides educational materials about broker-dealers, investment advisers, and investing.

Item 2 – Relationships and Services - What investment services and advice can you provide me?**Northbound Securities LLC.
(Broker Dealer)**

We provide retail self-directed investors the ability to buy and sell exchange-traded securities through our mobile application.

Recommendations: We do not make recommendations of account types, securities or investment strategies.

Monitoring: We will make available your account statements on our mobile application. We do not monitor or manage accounts.

Investment Authority: You are solely responsible for trading and investment decisions in your account. We do not have the authority to manage your accounts on a discretionary basis and we do not trade in your accounts.

Limited Investment Offerings: We offer a limited selection of investments. Other firms could offer a wider range of choices, some of which might have lower costs. The investments offered primarily include publicly-traded equities and exchange traded funds (ETFs). Our firm trades most stocks and ETFs that are listed on major US stock exchanges, such as NYSE and NASDAQ, but may limit certain securities due to low market capitalization or trading volume.

Account Minimums and Other Requirements: We do not currently impose any minimum or maximum account balances, although we reserve the right to impose them in the future.

Additional Information. This is a brief summary of our services. For additional information on our services, please refer to:

- Your account agreement
- BrokerCheck
- Our website
- Form CRS FAQ

For additional information on our services, please visit BrokerCheck at [BrokerCheck.Finra.org](#), our website at [vest.investments](#), your account agreement and the Form CRS FAQ at [vest.investments](#).

**VestWealth, Inc.
(Investment Advisor)**

We provide investment advisory services to retail investors through an online web-based and mobile platform (the "Platform"). Our Platform is available via our mobile application ("App") and our website ("Website"). When you open an investment account ("Investment Account") with us, you will be able to access the Platform through the App.

Recommendations. Using online tools, we assess the client's financial circumstances based on the information provided by the client in their Suitability Questionnaire. Based on the results of this assessment, we recommend a portfolio ("Investment Portfolio") with a target asset allocation that we believe is appropriate for the client's financial circumstances. We do not offer comprehensive financial planning.

Monitoring. If a client selects a recommended Investment Portfolio, we are responsible for ongoing management of the client's portfolio, including monitoring investment performance, rebalancing and adjusting the Investment Portfolio to meet initial target allocations. Additionally, on a quarterly and annual basis, we will remind you to review and update the information provided in your Suitability Questionnaire.

Clients may impose reasonable investment restrictions on the management of their Investment Account such as opting out of the automatic quarterly rebalancing of their Investment Portfolio.

Investment Authority. Clients have the sole discretion to accept our portfolio recommendation, or to reject our recommendation and select a different portfolio. Once the client accepts an allocation portfolio, the client may elect to engage us for our discretionary portfolio management services. This means that we have the limited authority to automatically rebalance and adjust Investment Accounts in order to meet stated objectives without requiring the client's prior authorization.

Limited Investment Offerings. Portfolios include exchange-traded funds (ETFs).

Account Minimums and Other Requirements. Clients are required to deposit a minimum of \$20 to open an Investment Account and must maintain a minimum balance of \$20. If a Client's Investment Account balance drops below \$20, any holdings in the Investment Account will be liquidated and any funds will be returned to the Client's Investment Account, less any fees due to the Firm.

Additional Information. This is a brief summary of our services. Additional information is available in Item 4 of our Form ADV Part 2A, Appendix 1 ("Brochure"), available at our website at [vest.investments](#) or at <https://adviserinfo.sec.gov>.

Conversation Starters. Ask your financial professional:

- Given my financial situation, should I choose an investment advisory service? Should I choose a brokerage service? Why or why not?
- How will you choose investments to recommend to me?
- What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?

Item 3 – Fees, Costs, Conflicts, and Standard of Conduct**What fees will I pay?****Northbound Securities LLC.
(Broker Dealer)****VestWealth, Inc.
(Investment Advisor)**



You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying

Transaction-Based Fees: We do not charge commissions for executing buy and sell orders.

Other Fees and Costs: We do not charge custodial fees however, we do charge account inactivity fees on a quarterly basis. We charge fees associated with specific activity in your account, such as wire transfer fees, ACH fees, and fees for outgoing transfers and other regulatory trading fees outlined in our Fee Schedule. Please see: vest.investments

Additional Information. You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. For additional information on our fees, please visit the Fees page of our website.

You will be charged an annualized fee of up to 1.25% for Advisory Services. Annual fees are not charged in advance. Fees are charged monthly, calculated daily and deducted on a monthly basis.

The monthly fee is based upon the market value of all assets held within the Client's Investment Account on the last business day of the calendar month. The Advisory Services commence on the date on which the advisory agreement is signed by us and the Investment Account is funded. For the first calendar month, fees will be adjusted pro rata based on the number of calendar days for which the advisory agreement was effective. Any contributions and/or withdrawals made during a calendar month may result in an adjustment to the advisory fee. The Client may be charged a pro rata fee in the event the Client's service is terminated on a day other than the last business day of the calendar month. In that event, the pro rata fee will be due and payable upon termination of the service.

In addition to the advisory fees charged you may be charged other fees that include brokerage commissions, transaction fees, sales loads, sales charges, management fees, administrative fees, account maintenance fees, transfer taxes, wire transfer fees, electronic fund fees, and other fees may be charged by the broker or dealer selected for execution of the securities transactions in the Investment Accounts, by the custodian, and/or by the distributor, issuer or fund issuing the securities purchased and sold within the Investment Accounts. You will be solely responsible for paying all such charges. In addition, certain exchange-traded funds ("ETFs") pay management fees to their investment advisers, which reduce their respective assets. To the extent that the portfolio has investments in ETFs, you may pay two levels of advisory fees for the management of their assets: one directly to the Firm, and the other indirectly to the managers of those ETFs held in their portfolios.

Additional Information. You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. Additional information about our fees is available in Item 5 of our Brochure, available at our website at vest.investments or at <https://adviserinfo.sec.gov>.

Conversation Starter. Ask your financial professional:

- Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?

What are your legal obligations to me when providing recommendations as my broker-dealer or when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

**Northbound Securities LLC.
(Broker Dealer)**

We **do not** provide recommendations as your broker-dealer. The way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the services, we provide you. Here are some examples to help you understand what this means

Conflicts of Interest: In some instances, the more transactions in securities priced under \$5 in your account, the more fees we charge you. However, those fees are charged by our clearing firms and are passed through to you, without us making any profits. We therefore do not have an incentive to encourage you to engage in those transactions. However, we will share in revenue on securities lending, cash balances, payments for order flow and other ancillary fees generated by our clearing firm. This may present an incentive for us to encourage this type of activity.

Proprietary Products: We do not sell investments that are issued, sponsored, or managed by us or our affiliates.

Third-Party Payments: We do not receive compensation from third-parties to promote, offer or sell any specific securities or investments. Our financial professionals do not receive more money if you buy certain investments.

Revenue Sharing: Our clearing firm shares with us interest revenues on the cash balance in your account, and the payments they receive from trade

**VestWealth, Inc.
(Investment Advisor)**

When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice, we provide you. Here are some examples to help you understand what this means.

Conflicts of Interest: An asset-based fee presents a conflict of interest because the more assets you have in your advisory account, the more you will pay in fees; therefore, we may have an incentive to encourage you to increase the assets in your account. Northbound Securities will affect trades for VestWealth and is an affiliate of VestWealth. Since VestWealth Clients must use Northbound Securities, there is an inherent conflict of interest involving common ownership, as both are owned by the Parent. Although VestWealth is not directly compensated as a result of a Client's engagement with Northbound Securities, VestWealth will indirectly benefit due to their common ownership. The more commercially successful Northbound Securities is, the better it is for VestWealth. Notwithstanding this conflict, VestWealth believes that this arrangement with Northbound Securities does not interfere with its provision of Advisory Services.

Proprietary Products: We do not recommend investments that are issued, sponsored, or managed by us or our affiliates.



execution venues when they send your orders to these venues for execution.

Principal Trading: We do not buy investments from you, and sell investments to you, from our own accounts (called "acting as principal"), so we have no incentive to encourage you to trade with us.

Fractional Shares: We facilitate transactions in fractional shares that are less than one full share. We have an incentive to encourage you to buy these shares as they are not transferable and therefore encourage you to remain as a client.

Third-Party Payments: We do not receive compensation from third-parties to promote, offer or sell any specific securities or investments. Our financial professionals do not receive more money if you buy certain investments.

Principal Trading: We do not buy investments from you, and sell investments to you, from our own accounts (called "acting as principal").

For more information please see Items 10, 11 and 12 of our Brochure, available at our website at vest.investments or at <https://adviserinfo.sec.gov>.

Conversation Starter. Ask your financial professional:

- How might your conflicts of interest affect me, and how will you address them?

How do your financial professionals make money?

**Northbound Securities LLC.
(Broker Dealer)**

Employees are typically paid on a salary basis. Because employees do not provide individualized advice, such compensation is not based on factors such as the amount of client assets they service, the time and complexity required to meet a client's needs, the product sold (differential compensation); product sales commissions, or revenue we earn from financial professionals' advisory services or recommendations.

**VestWealth, Inc.
(Investment Advisor)**

Our sole source of revenue is from the asset-based fee described above. Employees are typically paid on a salary basis. Because employees do not provide individualized advice, such compensation is not based on factors such as the amount of client assets they service, the time and complexity required to meet a client's needs, the product sold (differential compensation), product sales commissions, or revenue we earn from advisory services or recommendations.

Item 4 – Disciplinary History

Do you or your financial professionals have legal or disciplinary history?

**Northbound Securities LLC.
(Broker Dealer)**

No, Northbound Securities does not have financial professionals with legal and disciplinary history. Visit investor.gov/CRS for a free and simple search tool to research our firm and our financial professionals.

**VestWealth, Inc.
(Investment Advisor)**

No. For additional information see investor.gov/CRS for a free and simple search tool to research us and our financial professionals.

Conversation Starter. Ask your financial professional:

- As a financial professional, do you have any disciplinary history? For what type of conduct?

Item 5 – Additional Information

**Northbound Securities LLC.
(Broker Dealer)**

For additional information about our brokers and services, please see Investor.gov, BrokerCheck at [BrokerCheck.Finra.org](https://brokercheck.finra.org), our website at vest.investments and your account agreement. You may also contact us at +1 (512) 686-6519 or at soporte@mivest.io or at vest.investments to obtain copies of these documents at any time. You can find answers to the questions posed in this Form CRS in the Form CRS FAQ vest.investments

**VestWealth, Inc.
(Investment Advisor)**

For additional information about our advisory services, please see Investor.gov, BrokerCheck at [BrokerCheck.Finra.org](https://brokercheck.finra.org) or <https://adviserinfo.sec.gov>, our website at vest.investments and your account agreement. You may also contact us at soporte@mivest.io or at vest.investments to obtain copies of these documents at any time. You can find answers to the questions posed in this Form CRS in the Form CRS FAQ vest.investments

Conversation Starters. Ask your financial professional:

- Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer?
- Who can I talk to if I have concerns about how this person is treating me?



Exhibit A – Summary of Material Changes

On our March 30th, 2024 we made the following material changes for Northbound Securities LLC:

- On March 30th, 2024 the affiliated Northbound Securities LLC has been replaced for Vestfi, Inc.
- The website was changed from mivest.io to vest.investments.
- Under the Firm's personnel disciplinary history, the following was added: No, Northbound Securities does not have financial professionals with legal and disciplinary history. Visit investor.gov/CRS for a free and simple search tool to research our firm and our financial professionals.

On our March 23rd, 2022 we made the following material changes for Vestfi, Inc.:

- Under the Firm's personnel disciplinary history, the following was added: Yes, Vestfi, Inc. does have financial professionals with legal and disciplinary history. Visit investor.gov/CRS for a free and simple search tool to research our firm and our financial professionals.
- Under the section Additional Information, the following was added: You may also contact us at + 1 (512) 686-6519.

Since that last edition on March 23rd, 2022, we are including the following material changes:

- Under all the sections of the Customer Relationship Summary we have added the related disclosures for VestWealth, Inc, our affiliated Registered Investment Advisor (RIA).