

# Vestorly, Inc.

## Firm Brochure - Form ADV Part 2A

*This brochure provides information about the qualifications and business practices of Vestorly, Inc. If you have any questions about the contents of this brochure, please contact us at (646) 588-0399 or by email at: [justin@advisorleap.com](mailto:justin@advisorleap.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.*

*Additional information about Vestorly, Inc. is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Vestorly, Inc.'s CRD number is: 161870*

122 West 26th Street, 4th Floor  
New York, NY 10001  
(646) 588-0399  
[www.vestorly.com](http://www.vestorly.com)  
[justin@advisorleap.com](mailto:justin@advisorleap.com)

*Registration does not imply a certain level of skill or training.*

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## **Item 2: Material Changes**

Vestorly, Inc. has not yet filed an annual updating amendment using the Form ADV Part 2A. Therefore there are no material changes to report.

## Item 3: Table of Contents

### Table of Contents

Item 2: Material Changes.....	i
Item 3: Table of Contents.....	ii
Item 4: Advisory Business.....	5
A. Description of the Advisory Firm.....	5
B. Types of Advisory Services.....	5
Online Platform Services .....	5
Services Limited to Specific Types of Investments.....	5
C. Client Tailored Services and Client Imposed Restrictions .....	5
D. Wrap Fee Programs .....	5
E. Amounts Under Management .....	5
Item 5: Fees and Compensation.....	6
A. Fee Schedule .....	6
Online Platform Service Fees .....	6
B. Payment of Fees.....	6
Payment of Online Platform Service Fees .....	6
C. Clients Are Responsible For Third Party Fees .....	6
D. Prepayment of Fees .....	6
E. Outside Compensation For the Sale of Securities to Clients .....	6
Item 6: Performance-Based Fees and Side-By-Side Management .....	6
Item 7: Types of Clients .....	7
Minimum Account Size .....	7
Item 8: Methods of Analysis, Investment Strategies, and Risk of Investment Loss .....	7
A. Methods of Analysis and Investment Strategies.....	7
Methods of Analysis .....	7
Charting analysis.....	7
Fundamental analysis .....	7
Technical analysis.....	7
Cyclical analysis .....	7
Investment Strategies.....	7
B. Material Risks Involved .....	8
Methods of Analysis .....	8
Fundamental analysis .....	8
Technical analysis.....	8
Cyclical analysis .....	8
Investment Strategies.....	8
C. Risks of Specific Securities Utilized.....	8

Item 9: Disciplinary Information .....	9
A. Criminal or Civil Actions.....	9
B. Administrative Proceedings.....	9
C. Self-regulatory Organization (SRO) Proceedings .....	9
Item 10: Other Financial Industry Activities and Affiliations.....	9
A. Registration as a Broker/Dealer or Broker/Dealer Representative .....	9
B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor .....	9
C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests.....	9
D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections .....	9
Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....	10
A. Code of Ethics .....	10
B. Recommendations Involving Material Financial Interests .....	10
C. Investing Personal Money in the Same Securities as Clients.....	10
D. Trading Securities At/ Around the Same Time as Clients' Securities .....	10
Item 12: Brokerage Practices .....	10
A. Factors Used to Select Custodians and/or Broker/Dealers .....	10
1. Research and Other Soft-Dollar Benefits .....	10
2. Brokerage for Client Referrals.....	11
3. Clients Directing Which Broker/Dealer/Custodian to Use.....	11
B. Aggregating (Block) Trading for Multiple Client Accounts.....	11
Item 13: Reviews of Accounts.....	11
A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews.....	11
B. Factors That Will Trigger a Non-Periodic Review of Client Accounts .....	11
C. Content and Frequency of Regular Reports Provided to Clients.....	11
Item 14: Client Referrals and Other Compensation .....	12
A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes).....	12
B. Compensation to Non - Advisory Personnel for Client Referrals.....	12
Item 15: Custody .....	12
Item 16: Investment Discretion.....	12
Item 17: Voting Client Securities (Proxy Voting).....	12
Item 18: Financial Information.....	12
A. Balance Sheet.....	12
B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients .....	13
C. Bankruptcy Petitions in Previous Ten Years .....	13

## **Item 4: Advisory Business**

### **A. Description of the Advisory Firm**

Vestorly, Inc. is a Corporation organized in the state of Delaware. This firm was formed in January of 2012, and the principal owner is Justin P. Wisz.

### **B. Types of Advisory Services**

Vestorly, Inc. (hereinafter “Vestorly”) offers the following services to advisory clients:

#### ***Online Platform Services***

Vestorly is a private online platform for investment advisors “advisors” to publish content for their clients to see and then share with their friends and family through e-mail. New prospects that come to Vestorly.com can create a username and password to view their friend’s advisor’s content. The new prospect can also schedule a meeting with the advisor through this online platform. Vestorly will only allow leading, fee-based advisors with audited performance, and clean regulatory histories to participate. Vestorly will always ensure those advisors are properly licensed or registered as investment advisors prior to granting them access to the online platform.

#### ***Services Limited to Specific Types of Investments***

Vestorly will only be providing an online introductory medium for individual investors to find potential advisors. Vestorly will not directly provide investment advice to clients and will therefore not limit their services to specific types of investments.

### **C. Client Tailored Services and Client Imposed Restrictions**

Vestorly offers the same suite of services to all of their clients. Vestorly does not directly provide investment advice to clients. Investors should review the ADV 2A and 2B brochure documents of the advisor that they select to utilize for investment services.

### **D. Wrap Fee Programs**

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and any other administrative fees. Vestorly does not participate in any wrap fee programs.

### **E. Amounts Under Management**

Vestorly does not directly provide investment advice to clients and will therefore have no assets under management.

## **Item 5: Fees and Compensation**

### **A. Fee Schedule**

#### *Online Platform Service Fees*

Investors who are searching for an advisor will not be charged a fee for access to the online platform. Vestorly will receive up to twenty five percent of the fee collected by the advisor for introducing the investor and the advisor. The fee share will not cause the individual investor to pay an additional fee to use the Vestorly platform to find their advisor. Investment advisors may be charged up to \$249 per month to use the platform as well. Fees are negotiable and are paid quarterly in advance and in arrears. Clients may terminate their contracts with written notice.

### **B. Payment of Fees**

#### *Payment of Online Platform Service Fees*

The fees to third party advisors will be collected quarterly in advance and in arrears.

### **C. Clients Are Responsible For Third Party Fees**

Clients are responsible for the payment of all third party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by Vestorly. Please see Item 12 of this brochure regarding broker/custodian.

### **D. Prepayment of Fees**

Vestorly collects their fees in advance and in arrears. Fees that are collected in advance will not be refunded to the advisor.

### **E. Outside Compensation For the Sale of Securities to Clients**

Neither Vestorly nor its supervised persons accept any compensation for the sale of securities or other investment products, including asset-based sales charges or services fees from the sale of mutual funds.

## **Item 6: Performance-Based Fees and Side-By-Side Management**

Vestorly does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

## Item 7: Types of Clients

Vestorly provides individual investors and advisors access to the online platform.

### *Minimum Account Size*

There is no account minimum.

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

### A. Methods of Analysis and Investment Strategies

#### *Methods of Analysis*

Vestorly does not provide investment advice directly to clients. Investors should carefully review the selected advisor's ADV 2A brochure document for more information regarding methods of analysis. The selected advisor may use the following methods of analysis; fundamental analysis, technical analysis, and cyclical analysis.

**Charting analysis** involves the use of patterns in performance charts. The advisor may use this technique to search for patterns used to help predict favorable conditions for buying and/or selling a security.

**Fundamental analysis** involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

**Technical analysis** involves the analysis of past market data; primarily price and volume.

**Cyclical analysis** involved the analysis of business cycles to find favorable conditions for buying and/or selling a security.

#### *Investment Strategies*

Vestorly does not provide investment advice directly to clients. Investors should review the selected advisor's ADV 2A brochure document to review their policies regarding investment strategies. The selected adviser may utilize the following investment strategies; long term trading, short term trading, short sales, margin transactions, and options writing (including covered options, uncovered options, or spreading strategies).

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

## B. Material Risks Involved

### *Methods of Analysis*

**Charting analysis** strategy involves using and comparing various charts to predict long and short term performance or market trends. The risk involved in solely using this method is that only past performance data is considered without using other methods to crosscheck data. Using charting analysis without other methods of analysis would be making the assumption that past performance will be indicative of future performance. This may not be the case.

**Fundamental analysis** concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

**Technical analysis** attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not work long term.

**Cyclical analysis** assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are two-fold : 1) the markets do not always repeat cyclical patterns and 2) if too many investors begin to implement this strategy, it changes the very cycles they are trying to take advantage of.

### *Investment Strategies*

Long term trading is designed to capture market rates of both return and risk. Frequent trading, when done, can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

Short term trading, short sales, margin transactions, and options writing generally hold greater risk and clients should be aware that there is a material risk of loss using any of those strategies.

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

## C. Risks of Specific Securities Utilized

Vestorly does not provide investment advice directly to clients.

**Past performance is not a guarantee of future returns. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

## **Item 9: Disciplinary Information**

### **A. Criminal or Civil Actions**

There are no criminal or civil actions to report.

### **B. Administrative Proceedings**

There are no administrative proceedings to report.

### **C. Self-regulatory Organization (SRO) Proceedings**

There are no self-regulatory organization proceedings to report.

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

### **A. Registration as a Broker/Dealer or Broker/Dealer Representative**

Neither Vestorly nor its representatives are registered as or have pending applications to become a broker/dealer or as representatives of a broker/dealer.

### **B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor**

Neither Vestorly nor its representatives are registered as or have pending applications to become a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor.

### **C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests**

Justin P. Wisz and Ralph B. Howard Pahlmeyer II are currently advisors of AdvisorLeap, Inc., a Registered Investment Advisory firm. From time to time, they will offer clients advice or products from those activities. Vestorly always acts in the best interest of the client.

### **D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections**

Through the online Vestorly platform, clients will be directed to third party advisors. Vestorly will be compensated via a fee share from the advisors to which it directs those clients. This relationship will be disclosed in each contract between Vestorly and each third party advisor.

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

### **A. Code of Ethics**

We have a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. Our Code of Ethics is available free upon request to any client or prospective client.

### **B. Recommendations Involving Material Financial Interests**

Vestorly does not recommend that clients buy or sell any security in which a related person to Vestorly or Vestorly has a material financial interest.

### **C. Investing Personal Money in the Same Securities as Clients**

Vestorly does not recommend securities to clients and will not be directly providing investment advice to clients.

### **D. Trading Securities At/Around the Same Time as Clients' Securities**

Vestorly does not trade securities on their client's behalf and will therefore not trade client securities at the same time as they trade their own securities.

## **Item 12: Brokerage Practices**

### **A. Factors Used to Select Custodians and/or Broker/Dealers**

Vestorly will not provide direct investment advice to clients and will not recommend custodians or broker/dealers to clients.

#### ***1. Research and Other Soft-Dollar Benefits***

Vestorly receives no research, product, or services other than execution from a broker-dealer or third-party in connection with client securities transactions ("soft dollar benefits").

## ***2. Brokerage for Client Referrals***

Vestorly receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

## ***3. Clients Directing Which Broker/Dealer/Custodian to Use***

Vestorly will not provide investment advice to clients and will therefore allow clients to use the broker of their choosing.

### **B. Aggregating (Block) Trading for Multiple Client Accounts**

Vestorly maintains the ability to block trade purchases across accounts. Block trading may benefit a large group of clients by providing Vestorly the ability to purchase larger blocks resulting in smaller transaction costs to the client. Declining to block trade can cause more expensive trades for clients.

## **Item 13: Reviews of Accounts**

### **A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews**

Client accounts are reviewed at least monthly only by Justin P. Wisz, President. Justin P. Wisz is the chief advisor and is instructed to review clients' accounts with regards to their investment policies and risk tolerance levels. All accounts at Vestorly are assigned to this reviewer.

### **B. Factors That Will Trigger a Non-Periodic Review of Client Accounts**

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

### **C. Content and Frequency of Regular Reports Provided to Clients**

Each client will receive at least quarterly from the custodian, a written report that details the client's account including assets held and asset value which will come from the custodian.

## **Item 14: Client Referrals and Other Compensation**

### **A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)**

Vestorly enables introductions to other advisors through the online platform and participate in their fees after the prospect becomes a client.

### **B. Compensation to Non - Advisory Personnel for Client Referrals**

Vestorly does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

## **Item 15: Custody**

Vestorly does not have custody over client accounts. Clients will receive all required account statements and billing invoices from the custodian that are required in each jurisdiction, and they should carefully review those statements for accuracy.

## **Item 16: Investment Discretion**

Vestorly does not have discretion over client accounts at any time.

## **Item 17: Voting Client Securities (Proxy Voting)**

Vestorly will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

## **Item 18: Financial Information**

### **A. Balance Sheet**

Vestorly does not require nor solicit prepayment of more than \$1,200 in fees per client, six months or more in advance and therefore does not need to include a balance sheet with this brochure.

## **B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients**

Neither Vestorly nor its management have any financial conditions that are likely to reasonably impair our ability to meet contractual commitments to clients.

## **C. Bankruptcy Petitions in Previous Ten Years**

Vestorly has not been the subject of a bankruptcy petition in the last ten years.