

Item 1 Cover Page

Wefea Capital LLC
Firm CRD #:299615

Form ADV Part 2A – Disclosure Brochure

Effective: December 15, 2021

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www.slr67.net

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

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

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

Item 2 Material Changes

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

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

Future Changes

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

Current Changes

The changes made to this Brochure since our lasting filing are as follows:

- We have eliminated the termination fee and deleted all references to the termination fee.
- We have completed the disclosure for state registered investment advisers.

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

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Item 4 Advisory Business

A. Description of Advisor Firm.

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

B. Description of Advisory Services Offered

Technology Platform

Wefea Capital LLC (herein referred to as “Wefea Capital” or “Advisor”) has created a proprietary technology platform to help address the United States student loan debt issue that now totals \$1.7Trillion dollars among 45 million borrowers. Current federal initiatives focus on capping and shortening the duration of student loan payments, which alleviates the burden for students but results in even higher spending by the government. Wefea Capital’s strategy encourages and rewards repayment and, we believe, would ultimately cost the government less, benefiting all those involved, such as, the students, lenders, local communities, states and the nation.

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

Wefea Capital has built an entire ecosystem in secured cloud computing. All interested clients will join online. The target audience is students (current or graduates) who have outstanding student debt and scheduled for loan payment in 3 to 10 or more years; and, parents seeking an alternative to saving for their child’s future college education. Every client will have real time secure connectivity from any browser, wireless device or desktop/laptop through the cloud infrastructure to monitor the progress of their account.

The client will log on directly at www.slr67.net with their email address and a password. Upon confirmation of the client’s email, the client will complete a Risk Management Profile outlining their current education, age, annual income, term of investment and risk tolerance (Conservative, Moderate or Aggressive). The completed Risk Management Profile will electronically be sent to Interactive Brokers, where we have an established custodial relationship, in order to establish an account in the client’s name. The client will then go through the account opening process, online. The account opening documents are submitted electronically to Interactive Brokers for review by their compliance department. Upon approval, the client will receive a secure confirmation with a new account number. That new account number will display in the client’s dashboard portal on the SLR67.net website.

The client will then be able to make deposits directly into their account established at Interactive Brokers by setting up either a one-time or recurring deposit by bill pay, ACH or direct deposit. **A minimum dollar amount of \$500 per year is required to maintain an account.**

The account will be managed by Wefea Capital, on a discretionary basis, according to the terms selected by the client. The Advisor will manage the funds using any of the following asset classes; exchange listed securities, over-the-counter securities, exchange traded funds (ETFs), foreign securities, mutual funds, United States government securities, and interests in partnerships investing in real estate to accomplish the objective of diversifying the portfolio in an effort to reduce risk and increase performance to meet the objective of the term selected by the student for repayment of the outstanding student loan.

At all times the individual will have access to view their account on the Interactive Brokers' website. Clients establish the frequency of when they will receive written account statements, monthly, quarterly or yearly from Interactive Brokers.

In the account set up process, Clients have the option of selecting the term length for their investment: 3 years, 5 years, 7 years, 10 years or more. At the end of the term the funds in the client's account can be deposited with the borrower's lender or client designated educational institute or assigned financial institute.

In order for the SLR 67 program to be effective, Clients need to maintain their account for the investment term they select at the start of the relationship. This helps Wefea Capital effect the investment strategy according to the client's risk profile with the goal of providing better investment returns.

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

C. Clients Tailored Services and Client Imposed Restrictions

The SLR 67 program is designed to help clients repay their outstanding student loan sooner within the term length for investment selected by the client. Wefea Capital utilizes appropriate asset classes as outlined in Item 4A to help grow the portfolio to meet that objective. Clients will select the appropriate investment strategy, based on how each strategy will be invested, to meet their individual needs when completing the Risk Management Profile provided on the SLR 67 website. Essentially, selecting the particular investment strategy by the client is imposing the client's restrictions on how their account will be invested. Clients need to be aware that they are not able to impose restrictions on the investments in the investment strategy they select.

D. Wrap Fee Programs

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

E. Assets Under Management

As of June 12, 2020, Wefea Capital has client assets under management as follows:

Discretionary:	\$21,642
Non-Discretionary"	\$ 0

Item 5 Fees and Compensation

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

Asset Management Fees

The client will pay Wefea Capital a quarterly management fee, payable in arrears, based on the value of portfolio assets of the account managed by the Advisor on the last business day of the preceding quarter. The annual management fee is 1.00%.

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

C. Additional Client Fees Charged

All fees paid to Wefea Capital for investment advisory services are separate and distinct from the expenses charged by mutual funds to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee and other fund expenses.

At no time will Wefea Capital accept or maintain custody of a client's funds or securities except for authorized fee deduction. Client is responsible for all custodial, securities and brokerage execution fees charged by the custodian and executing broker-dealer. The Advisors fee is separate and distinct from the custodian and execution fees. See Item 12 Brokerage Practices, for further information of brokerage and transaction costs.

D. Prepayment of Client Fees

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

E. External Compensation for the Sale of Securities to Clients

Not applicable to Wefea Capital or its supervised persons.

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

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

Item 7 Types of Clients and Minimum Account Size

The users of Wefea Capital's website are clients with current student loan debt, or parents of children seeking to create a college fund for their child.

However, users of the SLR 67 program may utilize the service with any amount they need to pay back to the lender understanding that there is a minimum dollar amount of \$500 per year to maintain an account.

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

A. Methods of Analysis and Investment Strategies

The Advisor utilizes fundamental, technical or cyclical analysis techniques in managing client accounts held at Interactive Brokers.

Fundamental analysis of businesses involves analyzing its financial statements and health, its management and competitive advantages and its competitors and markets. Fundamental analysis is performed on historical and present data but with the goal of making financial forecasts. There are

several possible objectives; to conduct a company stock valuation and predict its probable price evolution; to make a projection on its business performance; to evaluate its management and make internal business decisions and to calculate its credit risk. The risk assumed is that the market will fail to reach expectations of perceived value.

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

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

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

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

B. Investment Strategy and Method of Analysis Material Risks

The methods of analysis and investment strategies followed by Wefea Capital are utilized for all client accounts. One method of analysis or investment strategy is not more significant than the other as the Advisor is considering the time horizon of the client.

C. Security Specific Material Risks

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

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

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

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

Here are other risks of investing to consider:

Asset Class Risk

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

Concentration Risk

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

Equity Securities Risk

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

Foreign Securities Risk

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

Emerging Market Securities Risk

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

Growth Securities Risk

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

Issuer Risk

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

Management Risk

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

Market Risk

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

Political Risk

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

Market Trading Risks

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

Passive Investment Risk

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

Larger Company Securities Risk

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

Short Selling Risk

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

Liquidity Risk

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

Regulatory Risk

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

Smaller Company Securities Risk

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

Value Style Investment Risk

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

Small Firm Risk

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

Interests in partnerships investing in real estate:

Real estate investment trusts ("REITs") allow individuals to invest in large-scale, income-producing real estate. A REIT is a company that owns and typically operates income-producing real estate or related

assets. These include office buildings, shopping malls, apartments, hotels, resorts, self-storage facilities, warehouses, and mortgages or loans. Unlike other real estate companies, a REIT does not develop real estate properties to resell them. Instead, a REIT buys and develops properties primarily to operate them as part of its own investment portfolio.

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

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

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

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

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

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

Alternative Strategy Mutual Funds. Certain mutual funds available in the program invest primarily in alternative investments and/or strategies. Investing in alternative investments and/or strategies will not be suitable for all investors and involves special risks, such as risks associated with commodities, real estate, leverage, selling securities short, the use of derivatives, potential adverse market forces, regulatory changes and potential illiquidity. There are special risks associated with mutual funds that invest principally in real estate securities, such as sensitivity to changes in real estate values and interest rates and price volatility because of the fund's concentration in the real estate industry.

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

Item 9 Disciplinary Information

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

Item 10 Other Financial Industry Activities and Affiliations

A. Broker-Dealer or Representative Registration

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

B. Futures or Commodity Registration

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

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

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

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

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

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

A. Code of Ethics Description

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

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

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

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

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

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

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

See the response to Item 11C above.

Item 12 Brokerage Practices

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

Clients utilizing the SLR 67 program will open an account, in their name, with Interactive Brokers where Wefea Capital has an established custodial relationship and for our management of that account. Our use of Interactive Brokers should not be construed by the Client as a recommendation or endorsement of this custodian by Wefea Capital to the client. **Client's should be aware that Wefea Capital has performed a review and analysis of this custodian, however, clients are strongly encouraged to research the named custodian and the services they provide prior to engaging in this program.**

Research and Other Soft Dollar Benefits.

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

Brokerage for Client Referrals.

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

Directed Brokerage.

Clients that elect to invest in the SLR 67 program will open an account at Interactive Brokers, as the custodian of that account. Wefea Capital utilizes Interactive Brokers, based on criteria such as, but not limited to, reasonableness of services offered to the Advisor, tools and services made available to the client and the Advisor, and convenience of access to the account trading and reporting.

As an investment advisory firm, Wefea Capital has a fiduciary duty to seek best execution for assets held in that account on behalf of its clients. While best execution is difficult to define and challenging to measure, there is some consensus that it does not solely mean the achievement of the best price on a given transaction. Rather, it appears to be a collective consideration of factors concerning the trade in question. Such factors include the security being traded, the price of the trade, the speed of the execution, apparent conditions in the market, and the specific needs of the client. Wefea Capital's primary objectives when placing orders for the purchase and sale of securities for the account is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the broker. Wefea Capital may not necessarily pay the lowest

commission or commission equivalent as specific transactions involve specialized services on the part of the broker.

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

Wefea Capital does not allow for clients of the SLR 67 program to direct brokerage outside of the established custodial relationship with Interactive Brokers, which the Advisor has in place.

B. Aggregating Securities Transactions for Client Accounts

Wefea Capital's practice is to analyze and trade client accounts individually therefore there is no opportunity to initiate trades for multiple account at the same time.

Item 13 Review of Accounts

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

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

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

See the response to Item 13A.

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

Clients of the SLR 67 program will have ongoing access to view their account held at Interactive Brokers. Clients will be able to view the account's performance, deposits made, as well as all withdrawals from that account.

Item 14 Client Referrals and Other Compensation

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

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

B. Advisory Firm Payments for Client Referrals

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

Item 15 Custody

The Advisor instructs Interactive Brokers, the qualified custodian, to deduct our advisory fee directly from the client account. Interactive Brokers, the qualified custodian utilized by Wefea Capital maintains actual custody of your assets.

Clients establish the frequency of when they will receive written account statements, monthly, quarterly or yearly from Interactive Brokers. You should carefully review your account statement and notify us of any discrepancies.

Item 16 Investment Discretion

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

Discretionary authority will only be provided upon full disclosure to the client. The granting of such authority will be evidenced by the client's engagement of Wefea Capital, as the investment advisor, for management of the client's account when client's sign on for the SLR67 program.

Item 17 Voting Client Securities

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

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

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

Voting Guidelines

- Wefea Capital will vote proxies in the best interests of each particular client. Wefea Capital's policy is to vote all proxies from a specific issuer the same way for the client accounts. Clients are not permitted to place restrictions on how Wefea Capital will vote proxies.
- Wefea Capital will generally vote in favor of routine corporate housekeeping proposals such as the election of directors and selection of auditors absent conflicts of interest raised by an auditor's non-audit services.
- Wefea Capital will generally vote against proposals that cause board members to become entrenched or cause unequal voting rights.
- In reviewing proposals, Wefea Capital will further consider the opinion of management and

the effect on management, and the effect on shareholder value and the issuer's business practices.

Conflicts of Interest

- Wefea Capital will identify any conflicts that exist between the interests of the adviser and the client by reviewing the relationship of Wefea Capital with the issuer of each security to determine if Wefea Capital or any of its employees has any financial, business or personal relationship with the issuer.
- If a material conflict of interest exists, the CCO will determine whether it is appropriate to disclose the conflict to the affected clients, or to address the voting issue through other objective means such as voting in a manner consistent with a predetermined voting policy or receiving an independent third party voting recommendation.
- Wefea Capital will maintain a record of the voting resolution of any conflict of interest.

Clients may request information regarding how Wefea Capital voted a client's proxies as well as a copy of our proxy policies and procedures.

Item 18 Financial Information

A. Balance Sheet

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

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

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

C. Bankruptcy Petitions During the Past Ten Years

Not applicable to Wefea Capital.

Item 19 Requirements for State-Registered Advisers

A. Identify each of your principal executive officers and management persons, and describe their formal education and business background. If you have supplied this information elsewhere in your Form ADV, you do not need to repeat it in response to this Item.

Jay K. Patel, Managing Member, Founder and Chief Executive Officer. Wefea Inc. and Wefea Capital LLC were found and incorporated by Mr. Jay K Patel. Mr. Patel brings vision and 20+ years of experience in the field of financial and wireless markets. His expertise in electronics engineering is enhanced by software and business degrees. Mr. Patel's experience includes work with the Chicago Board of Trade, NYSE and NASDAQ (Now CME), Motorola and Bell Labs. He has worked in Radio and Cellular communication, GSM, Iridium (Satellite Communication), Wireless Local Loop, Strong Arm

11xx series Processor, Real time Market Data (NYSE and Nasdaq data feed), Routers and Switches, and virtual routers projects. Mr. Patel has earned MBA, Grad (Comp Science) and Undergrad (Electronics Engineering). His work experience includes the following:

- Business knowhow in financial market, AI, Cloud Computing, Wireless and Satellite, Fiber Optics, Search Engine, and social media.
- Filed patents in Wireless Core networks and financial technology, awarded and lost few patents due insufficient funds

10+ years of experience in Merger and Acquisitions for 4 private companies

Hariharan Iyer, Chief Compliance Officer. See Brochure Supplement attached hereto.

Stephen Ferguson, Chief Financial Officer. Steve is a result oriented and collaborative Finance executive with a passion for growth, driving efficiency, and constantly striving for excellence. He has a broad range of successful experience from working with Fortune 25 companies including G.E. and J.C. Penney to smaller companies in e-commerce and higher education sectors. This breadth of experience has allowed him to develop outstanding finance, accounting, auditing, sourcing, and project management skills. The underlying core skills Mr. Ferguson has developed have provided him the ability to dynamically lead I.T., HR, facilities, and risk management; in addition to traditional finance functions. Mr. Ferguson's exceptional combination of accounting, speech communications, MBA education, coupled with CPA, Six Sigma, Internal Audit, and GE work experience, have been instrumental in his ability to drive growth, efficiencies, and excellence.

B. Describe any business in which you are actively engaged (other than giving investment advice) and the approximate amount of time spent on that business. If you have supplied this information elsewhere in your Form ADV, you do not need to repeat it in response to this Item.

Not applicable.

C. In addition to the description of your fees in response to Item 5 of Part 2A, if you or a supervised person are compensated for advisory services with performance-based fees, explain how these fees will be calculated. Disclose specifically that performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

Not applicable.

D. If you or a management person has been involved in one of the events listed below, disclose all material facts regarding the event. 1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following: (a) an investment or an investment-related business or activity; (b) fraud, false statement(s), or omissions; (c) theft, embezzlement, or other wrongful taking of property; (d) bribery, forgery, counterfeiting, or extortion; or (e) dishonest, unfair, or unethical practices. 2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following: (a) an investment or an investment-related business or activity; (b) fraud, false statement(s), or

omissions; (c) theft, embezzlement, or other wrongful taking of property; (d) bribery, forgery, counterfeiting, or extortion; or (e) dishonest, unfair, or unethical practices.

Not applicable.

E. In addition to any relationship or arrangement described in response to Item 10.C. of Part 2A, describe any relationship or arrangement that you or any of your management persons have with any issuer of securities that is not listed in Item 10.C. of Part 2A.

Not applicable.

Privacy Policy

Wefea Capital

Effective: December 17, 2018

Our Commitment to You

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

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

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

The Information We Collect About You

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

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

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

- Information we receive in the course of establishing a customer relationship including, but not limited to, applications, forms, or other online documents;
- Information about your transactions with us or others

Information about You That Wefea Capital Shares

Wefea Capital works to provide products and services that benefit our customers. We share non-public personal information with non-affiliated third parties (such as brokers and custodians) as necessary for us to provide agreed services and products to you consistent with applicable law. We also disclose non-public personal information to other financial institutions with whom we have joint business arrangements for proper business purposes in connection with the management or servicing of the SLR 67 account. In addition, your non-public personal information will also be disclosed to you, persons we believe to be your authorized agent or representative, regulators in order to satisfy Wefea Capital's regulatory obligations, and is otherwise required or permitted by law. Lastly, we will disclose your non-

public personal information to companies we hire to help administrate our business. Companies we hire to provide services of this kind are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific service we have requested.

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

Information about Former Clients

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

Confidentiality and Security

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

We'll keep you informed

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

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

Hariharan Iyer
Personal CRD #7044470

Wefea Capital LLC
Firm CRD #:299615

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www.slr67.net

Effective Date: December 15, 2021

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

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

Item 2 Educational Background/Business Experience

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

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

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

Item 3 Disciplinary Information

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

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

Not applicable to Mr. Iyer.

Item 4 Other Business Activities

No other business activities to report concerning Mr. Iyer.

Item 5 Additional Compensation

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

Item 6 Supervision

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