

# **Willow Partner Advisors, LLC**

## **Form ADV Part 2A – Disclosure Brochure**

**Effective: January 22, 2021**

This Form ADV2A (“Disclosure Brochure”) provides information about the qualifications and business practices of Willow Partner Advisors, LLC (“Willow” or the “Advisor”). If you have any questions about the content of this Disclosure Brochure, please contact the Advisor at via our website [www.trustwillow.com](http://www.trustwillow.com).

Willow is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). The information in this Disclosure Brochure has not been approved or verified by SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about Willow to assist you in determining whether to retain the Advisor.

Additional information about Willow and its Advisory Persons are available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) or by searching with the Advisor’s firm name or CRD# 307906.

**Willow Partner Advisors, LLC**  
[www.trustwillow.com](http://www.trustwillow.com)

## **Item 2 – Material Changes**

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Willow 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. Willow encourages all current and prospective clients to read this Disclosure Brochure and discuss any questions you may have with us.

### Material Changes

The following material changes have been made to this Disclosure Brochure since the last filing and distribution to Clients:

- The Advisor is affiliated through common control and ownership with Willow Partner Coaches, LLC. Please see Item 10 for additional information.

### Future Changes

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

You may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) or by searching with the Advisor's firm name or CRD# 307906. You may also request a copy of this Disclosure Brochure at any time, by contacting the Advisor via our website [www.trustwillow.com](http://www.trustwillow.com).

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## **Item 4 – Advisory Services**

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### **A. Firm Information**

Willow Partner Advisors, LLC (“Willow” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”) conducting business as an “Internet-only” advisor pursuant to Section 203A-2(e) of the Investment Advisers Act of 1940, as amended (the “Advisers Act”).

Willow is organized as a limited liability company under the laws of the State of Delaware. Willow was founded in 2020 as a lead generation and education service for investors. Willow is owned by Willow Network, Inc. and is operated by Laurence G. Roosevelt (Co-Founder and Chief Executive Officer), Jason A. Aronson (Co-Founder, Chief Compliance Officer and Chief Product Officer), and Ivan Mitrovic (Co-Founder and Executive Chief Technology Officer). This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by Willow.

For questions regarding this Disclosure Brochure, please contact Jason Aronson at (413) 519-3519.

### **B. Advisory Services Offered**

Willow provides individuals and high net worth individuals (each referred to as an “Investor”) with an interactive, online financial advice matching platform at [www.trustwillow.com](http://www.trustwillow.com). The mission of Willow is to match Investors with fiduciaries to assist the Investor with their financial needs.

Willow does not manage investment assets. In matching Investors with qualified registered investment advisors (“RIAs”), Willow will receive a referral fee for its services. Please see Item 5 below.

Willow screens RIAs and the Investment Advisor Representatives (“IARs”) that seek to join the Willow platform. RIAs and IARs that are accepted to the Willow platform must agree to the Willow terms of service and meet Willow’s due diligence criteria. RIAs and IARs accepted to the Willow platform are also required to enter into a platform subscription agreement and, in some instances, a Solicitor Referral Agreement.

#### Referrals

Users visiting [www.trustwillow.com](http://www.trustwillow.com) and other electronic sites utilized by the Advisor will be offered access to the Willow Interactive platform, whereby the user can seek to evaluate, correspond with and/or select an RIA and/or IAR to seek to establish an advisory relationship. Willow provides investment advice to the user as to the selection of an RIA/IAR. Users are required to provide their net worth. Users are recommended to provide their financial goals, budgets, and relevant recent personal life experiences. Experiences may include the loss of a job, beginning a divorced, or loss of a spouse. Willow advises users to select an RIA/IAR based on the user’s financial situation and matches users with a specific RIA/IARs. The terms of the relationship between an Investor and an RIA/IAR are separate from any agreements between Willow and those parties.

In consideration for its services, Willow will receive a referral fee. Please see Item 5 below. For any Solicitor relationship the RIA and/or IAR must enter into a Solicitor Referral Agreement with Willow that defines the details of the relationship and the revenue-sharing arrangement.

The Investor, prior to entering into an agreement with an unaffiliated RIA, will be provided an electronic copy of each respective RIA’s Form ADV 2A – Disclosure Brochure (or a brochure that makes the appropriate disclosures) for that RIA.

#### Limited Access to Advisor

The Advisor serves as an “Internet-Only” investment advisor pursuant to Section 203A-2(e) of the Advisers Act. Under this registration the Advisor provides investment advice solely through its interactive website. The Advisor is not available to Investors for telephone conversations or communications through other means such as U.S. mail, courier or email (other than operational emails). The Advisor does not meet with Investors at its offices. All support and inquiries are delivered through the Advisor’s website. The Investor may engage an RIA through the Willow platform (at [www.trustwillow.com](http://www.trustwillow.com)) where the Investor can directly engage the RIA for advisory services, which may include the ability to meet the RIAs or its IARs in person.

The Advisor may, for a limited number of Investors annually, provide customized services, subject to the limitations set forth in Section 203A-2(e) of the Advisers Act.

#### **C. Client Account Management**

Prior to engaging Willow to provide services, each Investor must register via [www.trustwillow.com](http://www.trustwillow.com) and agree to the Willow terms of use and related requirements. RIAs and IARs are required to register and undergo a background due diligence process and may also be required to enter into a Solicitor Referral Agreement before access to the Willow platform is provided.

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

Willow does not offer a Wrap Fee Program.

#### **E. Assets Under Management**

Willow does not manage Investor assets and therefore has no disclosures for this Item.

### **Item 5 – Fees and Compensation**

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Willow is compensated through referral fee arrangements with other RIAs. Willow is only compensated if an Investor engages an RIA that has contracted with Willow to share in the revenue generated by the Investor's relationship with an RIA.

Willow does not charge a fee to Investors to utilize its platform at [www.trustwillow.com](http://www.trustwillow.com). RIAs and IARs that are accepted to the Willow platform will be required to enter into a Solicitor Agreement with Willow whereby Willow is compensated on an ongoing basis if the Investor becomes a client of the RIA. Willow provides the Investor with a Solicitor Disclosure Statement that details the revenue-sharing arrangement.

Investors are not charged for the use or access to the [www.trustwillow.com](http://www.trustwillow.com) platform.

#### **B. Fee Billing**

Fees are billed to RIAs pursuant to the terms and conditions agreed to between Willow and the Advisor.

#### **C. Other Fees and Expenses**

Investors may incur certain fees or charges imposed by third parties, other than Willow, in connection with their investments. Willow does not share in any of these fees, except as noted above.

#### **D. Advance Payment of Fees and Termination**

Referral fees are generally paid following RIA's or IAR's billing to the Investor. RIAs and IARs may terminate their relationship based on the terms of their agreement[s] with Willow. Investors may cancel their Willow profile at any time. The agreement[s] between the Investor and any third party are governed by the terms of those agreements.

#### **E. Compensation for Sales of Securities**

Willow does not buy or sell securities and does not receive any compensation for securities transactions in any Investor account, other than the fees noted above.

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

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Willow does not charge performance-based fees. Willow does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund).

### **Item 7 – Types of Clients**

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Willow provides investment advisory services to individuals and high net worth individuals. There is no fee or minimum level of wealth to use the website at [www.trustwillow.com](http://www.trustwillow.com).

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

Willow does not manage Investor assets and therefore has no disclosures to make with respect to this Item.

**Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Investor should understand and be willing to bear. Investor are reminded to discuss these risks with the RIA they select to be their advisor, if applicable. Investors should obtain risk disclosures from any advisor in which the conduct business and fully understand the risks of investing.**

## **Item 9 – Disciplinary Information**

**There are no legal, regulatory or disciplinary events involving Willow or any of its Supervised Persons.** Willow values the trust you place in the Advisor. The Advisor encourages Clients to perform the requisite due diligence on any advisor or service provider that the Client engages. The backgrounds of the Advisor and Supervised Persons are available on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or CRD# 290683.

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

### Willow Partner Coaches, LLC

Willow is affiliated through common ownership and control with Willow Partner Coaches, LLC ("Willow Coaches"), a financial coaching platform that connects individuals with financial coaches (each a "Coach") to assist with budgeting, spending and cash flow needs. Coaches may refer its clients to utilize Willow's platform for matching services with other registered investment advisors. Under such circumstances, there is no compensation for any such referrals.

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

Willow has implemented a Code of Ethics (the "Code") that defines the Advisor's fiduciary commitment to each Investor. This Code applies to all persons associated with Willow ("Supervised Persons"). The Code was developed to provide general ethical guidelines and specific instructions regarding duties to the Investor. Willow also recommends that the Investor obtain the Code of Ethics of any advisor in which the Investor engages for services. The Code covers a range of topics that address employee ethics and conflicts of interest. To request a copy of the Code by contacting the Advisor via the website [www.trustwillow.com](http://www.trustwillow.com).

## **Item 12 – Brokerage Practices**

Willow does not select or recommend broker-dealers/custodians. Willow recommends RIAs and IARs, which may recommend these providers to complement and support their services.

## **Item 13 – Review of Accounts**

Not applicable.

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

### **A. Compensation Received by Willow**

Willow is compensated by RIAs and IARs as detailed in item 5.

### **B. Client Referrals from Solicitors**

Willow does not engage paid solicitors for Client referrals.

## **Item 15 – Custody**

Willow does not accept or maintain custody of any Investor accounts.

#### **Item 16 – Investment Discretion**

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Willow does not manage Investor assets and therefore has no disclosures for this Item.

#### **Item 17 – Voting Client Securities**

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Willow does not manage Investor accounts. Willow does not accept proxy-voting responsibility for any Investor.

#### **Item 18 – Financial Information**

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Neither Willow, nor its management, have any adverse financial situations that would reasonably impair the ability of Willow to meet all obligations to its Investors. Neither Willow, nor any of its advisory persons, has been subject to a bankruptcy or financial compromise. Willow is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect fees of \$1,200 or more for services to be performed six months or more in advance.