

MyWallSt Advisory, LLC

Form ADV, Part 2, Appendix 1

MyWallSt Advisory Wrap Fee Program Brochure

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This Wrap Fee Program Brochure provides information about the qualifications and business practices of MyWallSt Advisory, LLC, related to the wrap fee program sponsored by MyWallSt Advisory, an online investment advisory program. If you have any questions about the contents of this brochure, please contact us at hello@mywallstadvisory.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.

MyWallSt Advisory, LLC is a registered investment adviser. Registration as an investment adviser does not imply any level of skill or training.

Additional information about MyWallSt Advisory, LLC is also available on the SEC's website at <https://www.adviserinfo.sec.gov> by searching the Firm's CRD Number 311970.

Item 2 – Material Changes

We initially provide you with a copy of our Wrap Fee Program Brochure when we enter into an agreement with you. On an annual basis, we will provide you with a Summary of Material Changes within 120 days of our fiscal year end. In the alternative, we may choose to provide you with a complete copy of our brochure.

This represents our initial brochure, so there are no material changes to report.

You may request a current copy of our Wrap Fee Program Brochure at any time without charge by contacting us by email at hello@mywallstadvisory.com or by phone at (917) 345-2461.

You may also obtain a copy of our current Wrap Fee Program Brochure at www.adviserinfo.sec.gov by searching for our Firm CRD No. 311970.

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Important Information: Throughout this Brochure, MyWallSt Advisory, LLC shall also be referenced as “MyWallSt”, or “the firm”, “our”, “we” or “us”.

Item 4 – Services, Fees and Compensation

Introduction

MyWallSt Advisory, LLC is a digital financial services company offering advisory services to U.S. based clients. The Firm is a Delaware limited liability company formed in November 2020, wholly owned by MyWallSt Ltd., an entity based in Dublin, Ireland.

Services

We strongly believe the most effective way to create wealth is through the long-term ownership of stocks. The primary focus of the MyWallSt Advisory program is to help you learn healthy financial habits and to reduce the barriers of entry to stock ownership.

Our advisory platform provides you access to the MyWallSt Ltd. educational content (referred to in this brochure as “Education”) and access to our advisory tools designed to provide risk analytics as well as smartphone trading access (referred to in this brochure as “Advisory App”).

To use the Advisory App, you need to complete a risk profile to select your risk tolerance. We use this information to assign you to a risk profile of Conservative, Moderate, or Aggressive. We categorize the securities that are available for purchase in the program as being Conservative, Moderate, or Aggressive. The securities available are a limited universe of publicly-traded stocks, which is subject to change, as determined by the fully disclosed clearing firm DriveWealth. All users have access to the same universe of securities.

Our Fiduciary Advisors will review the self-directed trading activity in your account and compare to the investors profile to provide retroactive advice on the consistency of trading in the account with the client’s stated objectives. Other than providing these alerts retroactively, we do not tailor our services to your individual financial circumstances. The accuracy of your risk profile selection will affect the alert functionality of the Advisory App. If your risk profile changes, you need to update your risk profile in the Advisory App on the Profile tab.

Any information provided by the parent company MyWallSt Ltd. is for informational and general educational purposes only and is not investment or financial advice. Any graphs, charts and other visual aids that may be provided are for informational purposes only, not to be used to make investment decisions.

Certain hypothetical scenarios that may be described in Educational App or in our marketing materials are for illustrative purposes only and the securities described are not actual securities held by client accounts. Inclusion of such scenarios is not intended as a recommendation to purchase or sell any security and performance of these scenarios does not indicate actual results.

Broker Dealer Election

We have established a relationship with DriveWealth, LLC, an SEC registered broker-dealer and FINRA member (the “Broker”). You must open a brokerage account with the Broker. We do not maintain custody of client assets. Client assets are maintained in an account with the Broker, a qualified custodian. The Broker also provides execution, clearing, and settlement services for your account. All account opening functionalities, including identity verification and approval, are handled digitally by Broker.

The Broker provides all brokerage services to you; therefore, you must agree to the terms of the Broker’s “Customer Account Agreement” to establish an account with Broker. Only individuals will be permitted to establish accounts with the Broker, which shall be in their own name. You will be required to complete all applicable Broker forms and agreements, including a limited power of attorney, which authorizes the Broker to deduct our fees from your accounts pursuant to your agreements with us. The Broker reserves the right to reject any account application for any reason whatsoever.

The Broker may add or remove any security from the Approved Securities List. If a security is removed from the Approved Securities List, the Broker will limit transactions in that particular security to the liquidation of positions only.

We do not receive research or other products or services from the Broker or third-party in connection with client securities transactions (“soft dollar benefits”), nor do we receive client referrals from the Broker.

We pay all brokerage and transaction costs for the stock purchase with the Broker.

Program Limitations

We do not provide comprehensive financial planning services and the investment advisory services provided through our Advisory App are not a complete investment program. We are not aware of your aggregate investable and invested assets. We encourage you to consider additional asset classes, strategies and investments to supplement your overall investment plan. You should not use our Advisory App as the sole component of your investment program.

Clients are fully responsible for determining when or if to trade. We do not recommend specific securities, and we do not monitor the securities in your account or rebalance your portfolio to any predetermined allocation.

Our program only offers publicly traded equity securities. You may sell your securities or transfer your securities to another account at any time. Please note, however, that fractional shares are not transferable. Fractional shares must be liquidated prior to transferring your account. You may also withdraw available cash out of your brokerage account at any time.

We do not accept directed brokerage arrangements. In seeking best execution, the determinative factor is not just cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of the Broker’s services. The appointment of a registered broker-dealer as

the sole Broker for your accounts may result in less favorable executions than may be available through the use of a different broker-dealer.

The Broker aggregates orders involving multiple client accounts trading in the same securities. Each client that participates in an aggregated transaction will participate at the average share price for transactions in the aggregated order.

This program allows you to purchase securities in dollar amounts rather than share quantities. Trading in fractional shares has unique risks and limitations that you should understand prior to participation in our Advisory App.

Fees and Compensation

As our compensation for making this program available, we charge an asset-based fee which is calculated on the amount of securities held in your brokerage account on a monthly basis. The rate used to calculate the fee is equal to a percentage of the current prevailing interest rate used by the Broker for cash accounts, which may change over time. You should be aware that the more securities you hold in your brokerage account, the higher your program fee will be. Clients who hold no securities in their brokerage account pay no program fee. At our sole discretion, the fee may be waived from time to time and/or discounted due to special promotions or based on individual client circumstances. All Fees are memorialized and agreed to in the client's Investment Advisory Agreement.

Although we believe our fees are competitive, lower fees for comparable services may be available from other investment advisers.

Neither the Firm nor its supervised persons accept compensation for the sale of securities or other investment products.

Item 5 – Account Requirements and Types of Clients

This program is available to individuals who are United States citizens, limited to individual accounts, and to those who use our Advisory App. Users must complete a risk profile, meet the requirements to open a brokerage account with the Broker as described above. The minimum investment amount to purchase a security is one dollar.

Item 6 – Portfolio Manager Selection and Evaluation

As discussed above, the Firm provides non-discretionary advisory services and does not exercise discretion over your account. You construct your own portfolio through our platform. The Firm provides continuous retroactive financial advice based on the client's individual needs. Licensed professionals are available to provide guidance via the Advisory App client service chat function, email and by phone or video conference.

Each client has the ability to impose reasonable restrictions on the management of his/her account, including the purchase and sale of available securities in the account. If the Firm feels a client's trading

activities are unreasonable based on your investment profile you will be notified in writing as part of the ongoing financial advisory services.

Voting Client Securities

We do not vote proxies on your behalf. You will receive proxy materials directly from the Broker or its designee and are solely responsible for voting such proxies.

Methods of Analysis and Investment Strategies

We engage in retroactive methods of analysis, financial planning, asset allocation, general market-timing, and/or specific timing of economic cycles, asset or sector classes, or individual securities. Our investment strategy begins with an understanding of a client's financial goals. Advisors use demographic and financial information provided by the client to assess the client's risk profile and investment objectives in determining an appropriate plan for the client's assets. Investment strategies ordinarily include long- or short-term purchases of stock portfolios, mutual funds and fixed income securities. Investment recommendations are based on an analysis of the client's individual needs, and are drawn from research and analysis. Security analysis methods include fundamental analysis, technical analysis, charting and cyclical analysis. Information for this analysis is drawn from financial website and magazines, research materials prepared by others, annual reports, corporate filings, prospectuses, company press releases, and corporate ratings services. We encourage you to maintain a diversified, long-term oriented portfolio using the Advisory App and other investment options available to you outside of the self-directed program.

Risks of Loss

Investing in securities involves risk of loss that you should be prepared to bear. We do not represent or guarantee that your financial goals and objectives will be met or that you will be insulated from losses. Past performance does not indicate future performance. Not all investments are suitable for all investors. You should be aware of a number of factors that could affect your account, including the following:

Technology Risk. The Firm must rely on digital and network technologies to conduct its business. These technologies include those owned or managed by the Firm as well as by third parties, including yourself. These technology systems may fail to operate properly or become disabled as a result of events or circumstances wholly or partly beyond our control which could have a material effect on our business or our clients.

Stock Risk. Security prices can be volatile and investing in securities involves risk of loss. The value of stocks fluctuates in response to issuing company, market, political and economic developments. Prices may fluctuate, possibly significantly, in a short period of time. New issues may experience increased volatility due to supplier, key employee, financing or other factors. Your account will be subject to general movements in the stock market and the value fluctuations of each particular security.

Diversification Risk. Client accounts in the program may be concentrated in a relatively small

number of securities, which will expose the account to an industry or market sector. Any such concentration will increase risks associated with the account. Although diversification tends to reduce risks, because the program is non-discretionary, accounts may not be diversified. Losses in one or more positions, or a downturn in an industry or market sector, could adversely affect the account performance.

Investment Program Risk. We do not make recommendations of specific securities, and we do not provide comprehensive financial planning services. This program is not a complete investment program. You are encouraged to consider additional asset classes, strategies and investments to supplement your overall plan. You should not use the program as the sole component of your investment plan. Not all publicly traded securities may be available in the program.

Trading Risk: Trading does not occur in real time. The timing of the trades will be at Broker's discretion. Trades are at market price only; Broker does not allow for limit trades or hard stops.

Trading

will occur by aggregating orders involving multiple client accounts. Not trading in real time may affect the price the client pays or receives either higher or lower.

Fractional share trading allows you to purchase securities in dollar amounts rather than share quantities. Trading in fractional shares has unique risks and limitations that you should understand prior to participation in fractional share trading. Fractional shares are not transferable. If you close your account or transfer your account to another firm, the fractional shares held in your account will need to be liquidated. Fractional shares cannot be put into certificate form and mailed.

Frequent trading can result in losses from bid-ask spread opportunity costs, taxes and general market conditions.

Tax Risk. You are responsible for tax liabilities arising from transaction in your account. The Firm does not offer tax advice and encourages you to seek the advice of a qualified tax professional.

This list of risks may not be a complete explanation of all the risks involved in investing with this Program. You should read the entire brochure, client agreement, terms and conditions, and other materials that may be provided by us or within the Advisory App. You may need to consult with professionals such as tax, accounting, legal, or other financial advisers prior to engaging our services.

Item 7 – Client Information Provided to Portfolio Managers

We do not use external portfolio managers. At account opening, clients complete a risk profile. We do not collect any additional information. However, you will be required to provide information to the Broker to open your brokerage account.

Item 8 – Client Contact with Portfolio Managers

If you have any questions you may contact hello@mywallstadvisory.com. Licensed customer service representatives are available to help with technical, trading and to provide investment advice.

Item 9 – Additional Information

Disciplinary Information

The Firm and its management persons have not been a party to any legal or disciplinary events that would be material to your evaluation of our investment advisory business or the integrity of our management.

Other Financial Industry Activities and Affiliations

The Firm is a wholly owned affiliate of MyWallSt Ltd., a publisher of financial and educational information.

You are under no obligation to use MyWallSt Ltd. We encourage you to access other publishing firms of your choosing to gather additional financial and educational information.

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

We have adopted a Code of Ethics that governs the activities of each member, officer, director and employee of the Firm (collectively, “Employees”). We hold our Employees to a high standard of integrity and business practices that reflects our fiduciary duty to clients.

We will provide a copy of our Code to clients and prospective clients upon request. Such a request may be made by submitting a request to the email address listed on the cover page to this brochure.

Recommendations Involving Material Financial Interests

Because we do not make specific investment recommendations, we do not recommend that any client buy or sell any securities in which the Firm or a related person has a material financial interest.

Review of Accounts

We regular retroactive reviews of your account. Accounts are assigned to investment advisors who are responsible for performing quarterly reviews of the account and consult with the respective client of the account. Following these quarterly reviews, client reports are prepared and submitted to assist principals in supervising and monitoring the account. Factors that are considered include, but are not limited to, the following: investment objectives, targeted allocation, current allocation, suitability, performance, number of trades, monthly distributions, concentrated positions, diversification, and outside holdings. Investments are made on instructions you provide via the Advisory App.

We rely on your selection of risk profile to provide alerts on your securities purchases. If your risk profile changes, you need to update your risk profile in the Advisory App on the Profile tab. You may view your account at any time in the Advisory App. Statements are available from a

link to the Broker and statements may be requested from the Broker. The statements are accessible to you no less than quarterly showing the assets in your account, the market value, and your account's performance for the quarter, listing account balance(s), and transaction history. We urge you to carefully review statements received from the Broker and compare them to materials received from us, if any. You should review your account statements promptly to confirm the accuracy of the information contained.

Client Referrals and Other Compensation

We do not receive any economic benefit, directly or indirectly from any third party for advice rendered to clients. We do not offer compensation to any third party for client referrals.