

Part 2A of Form ADV: Firm Brochure

Item 1 Cover Page

**Wesley Pitt Charles Belden
Scholar Raise, LLC
818 18th Ave S. 10th Floor
Nashville, TN 37203
615-517-2065
3/30/21**

This brochure provides information about the qualifications and business practices of Scholar Raise, LLC. If you have any questions about the contents of this brochure, please contact us at 615-517-2065. 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 Scholar Raise, LLC also is available on the SEC's website at www.adviserinfo.sec.gov

Item 2 Material Changes

This brochure is the first brochure and therefore there are no material changes. Any subsequent material changed will be addressed annually in this section.

Item 3 Table of Contents

Item #	Title	Page #
Item 1	Cover Page	1
Item 2	Material Changes	2
Item 3	Table of Contents	3
Item 4	Advisory Business	4
Item 5	Fees and Compensation	5
Item 6	Performance-Based Fees and Side-By-Side Management	6
Item 7	Types of Clients	7
Item 8	Methods of Analysis, Investment Strategies and Risk of Loss	8
Item 9	Disciplinary Information	9
Item 10	Other Financial Industry Activities and Affiliations	10
Item 11	Code of Ethics, Participation or Interest in <i>Client</i> Transactions and Personal Trading	11
Item 12	Brokerage Practices	12
Item 13	Review of Accounts	13
Item 14	<i>Client</i> Referrals and Other Compensation	14
Item 15	Custody	15
Item 16	Investment Discretion	16
Item 17	Voting <i>Client</i> Securities	17
Item 18	Financial Information	18
Item 19	Requirements for State-Registered Advisers	19

Item 4 Advisory Business

I, Wesley Pitt Charles Belden, am the sole principal owner of Scholar Raise, LLC. Our firm was founded on January 3rd, 2018.

Here at Scholar Raise LLC, we offer aged based college saving plans. Our advice is dependent on multiple factors, with the most important being on the age of the children and expected college matriculation date. Our firm advises parents and grandparents of college aged students to create a 529 Investment Plan to encourage savings for the future higher education expenses. These plans may be used for tuitions, fees, books, supplies, room and board, and any other fees or expenses related to college education.

We tailor our advisory service to the needs of the individual clients. Every client is in a unique financial situation. We carefully review all our client's assets, debts, job history and all other important financial factors and provide an outline of the best financial options for colleges.

Scholar Raise does not, as of the date of this Brochure, participate in a wrap fee program.

Scholar Raise does not, as of the date of this Brochure, manage client assets.

Item 5 Fees and Compensation

Scholar Raise, LLC collects fees associated with contributions made by friends and family into the client's account. Fees are collected on a one-time basis, at the time of the transaction. The firm will bill clients for fees incurred and will not deduct fees from the client's assets.

Scholar Raise does not, as of the date of this Brochure, require any clients to pay fees in advance.

Scholar Raise does not, as of the date of this brochure, accept compensation on sales of securities or other investment products.

There are no prepaid fees associated with our services.

Fees are none negotiable.

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

Scholar Raise does not, as of the date of this brochure, accept performance-based fees based on a share of capital gain on or capital appreciation of assets owned by our clients.

Item 7 Types of *Clients*

Scholar Raise, as of the date of this Brochure, provides services only to individuals. Clients must be U.S. Citizen, eighteen (18) years of age or older, and must provide their Social Security Number.

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

Scholar Raise provides specialized analysis of investment opportunities to parents and grandparents of children who are planning on attending college in the foreseeable future. Investment advice is primarily influenced by the beneficiaries' age.

Our primary strategy is to advice and set up 529 Investment Plans for our clients. For these types of plans there are always risks associated with investment. Similar to ROTH IRAS, the contributions made to the account are already federally taxed up front, so no federal taxes will be incurred when the funds are distributed.

However, the most common risk associated with this process is that that funds must be used for qualified education expenses, such as school supplies and tuition. Otherwise, the holder of the account will be charged a penalty rate of ten percent (10%) by the IRS.

Another common penalty is if the beneficiary chooses not to seek a college education, funds can be withdrawn, but the holder will be penalized on the investment returns at a rate of ten percent (10%).

Our firm is not, as of the date of this Brochure, involved with frequent trading securities as part of our primary strategy for investment.

Item 9 Disciplinary Information

As of the date of this Brochure, there are no current or pending legal or disciplinary proceedings against the firm or any management person of the firm that would materially affect a prospective client's evaluation of our firm's integrity.

As of the date of this Brochure, no management person has....

- Been convicted of or pled guilty or pled no-contest to any felony or misdemeanor involved in any investment or investment related businesses nor has any such person been convicted or pled guilty to any related crimes such as the wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or conspiracy to commit any of the aforementioned offenses;**
- Been involved in a pending criminal proceeding involving any of the previously mentioned offenses;**
- Been found to have been involved in a violation of an investment related statute or regulation;**
- Been the subject of any order, judgment, decree permanently or temporarily enjoining or limiting his or her ability to engage in any investment related activity;**
- Been found to have cause or been involved in an investment related business that lost its authorization to do business by an administrative proceeding before the SEC or any other federally regulated agency, state agency, or any foreign regulatory agency;**
- Been subject to an order by a administrative proceeding before the SEC or any other federally regulated agency, state agency, or any foreign regulatory agency;**
- Been found by a self-regulatory organization (SRO) proceeding to have caused an investment related business to lost its business authorization, nor has any such person been found to have been involved in a violation of the SRO's rules, nor has any member been barred or suspended from membership from an association with other members, nor has any member been limited from conducting investment related activities, nor has any member been fined more than two thousand five hundred and no/100 (\$2,500.00) for any such action.**

Item 10 Other Financial Industry Activities and Affiliations

As of the date of this Brochure, there are no managing members who have registered to become a broker-dealer, nor has any managing person applied for registration.

As of the date of this Brochure, the Firm has no outside third-party relationship that would materially affect our advisory businesses or materially affect our services to our clients.

As of the date of this Brochure, the Firm will not receive compensation, directly or indirectly, for recommending or selecting other investment advisers for our clients.

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

Please See the Attached Schedule A for a copy of our Code of Ethics.

All clients and prospective clients will be provided a copy of the code of ethics.

As of the date of this Brochure, no managing person or related person is invested in the same securities that the firm would recommend to a client

Item 12 Brokerage Practices

As of the date of this Brochure, the Firm will not select or recommend broker-dealers for client transactions and will not collect commissions for these recommendations.

As of the date of this Brochure will not use “soft dollar benefits” for services.

As of the date of this Brochure, the Firm will not routinely recommend, request, or require that a client direct our firm to execute transactions through a specified broker-dealer.

As of the date of this Brochure, the Firm will not permit a client to direct brokerage.

Item 13 Review of Accounts

As of the date of this Brochure, the Firm will not periodically review our clients' accounts or financial plans.

Item 14 *Client Referrals and Other Compensation*

As of the date of this Brochure, the Firm is not involved with any person or entity, who is not already a client, that provides economic benefit to the Firm for providing investment advice or other advisory services to our clients. Nor does the firm directly or indirectly compensate any such persons or entities if said person or entity is not a supervised person for client referrals.

Item 15 *Custody*

As of the date of this Brochure, the Firm has no custody over any our clients' funds or securities.

Item 16 Investment Discretion

As of the date of this Brochure, the Firm will not be accepting any discretionary authority to manage securities accounts on behalf of the client.

Item 17 Voting *Client* Securities

As of the date of this Brochure, the Firm has no plans to accept authority to vote on clients' securities.

Item 18 Financial Information

As of the date of this Brochure, the Firm does not require or solicit prepayments of more than One Thousand Two Hundred and no/100 (\$1,200.00) dollars in fees per client six (6) months in advance or more.

As of the date of this Brochure, the Firm has no discretionary authority or custody over our client's funds or securities.

As of the date of this Brochure, the Firm has not been subject to a bankruptcy petition at any time during the past ten (10) years.

Item 19 Requirements for State-Registered Advisers

As of the date of this Brochure, Wesley Pitt Charles Belden, is the sole principal executive officer and sole management persons for Scholar Raise, LLC. Listed below is his formal education, business background, and current business activities.

Business Background:

Wesley Belden began his business career in 2007 as a portfolio analyst for American Money Management, a subsidiary of American Financial Group (AFG) located in Cincinnati, OH. During his three (3) year employment he was responsible for evaluating risk management for five (5) bank loan portfolios, with each bank having \$500 million in assets. Wesley Belden was also charged with assessing covenant compliance for two (2) bank loan portfolios totaling \$1 billion in assets. Wesley Belden produced long and short run financial models for possible investments and conducted credit analysis of corporate bank loans for possible investments. Because of his development and implementation of a new compliance monitoring system, the company reduced errors by 90%.

In 2010, Wesley Belden was hired as a business and management consultant at Hedgehog Consulting in West Palm Beach, FL. He was responsible for conducting analysis in areas of finance, operations, sales, marketing and human resources. He also provided SWOT analysis and industry analysis for clients. After conducting his analysis, he facilitated financing for clients which improved client volume and profit. In appropriate cases, he formulated exit strategies for small and medium sized companies.

In 2012, Wesley Belden started his own company as founder and CEO of Waffle, LLC, a web-based social media aggregator in Nashville, Tennessee. Through the company, Wesley Belden launched a digital platform to address his clients' needs in the marketplace for a comprehensive social media aggregator consolidates feeds including, Facebook, Twitter, Instagram, and LinkedIn. Wesley Belden managed a small team of seven (7) employees who were divided into cross functional teams separated by geographical distances. Wesley Belden also developed marketing strategies in order to create and distribute promotional materials.

In 2018, Wesley Belden started a new company as the founder and CEO of Scholar Raise, LLC, in Nashville, TN. As the CEO, he is responsible for managing products, managing marketing teams, handling customer communication, and maintaining compliance with records and product development.

Education Background:

Wesley Belden has earned a master's degree in business administration with a concentration in finance from the University of Cincinnati in 2009 and a bachelor of science degree from the University of Florida in 2007.

"SCHEDULE A"

Scholar Raise, LLC

Code of Ethics (COE)

April, 2021

Table of Contents

Purpose and Adoption	3
Definitions	3
Standards of Business Conduct and Compliance	4
Protection of Material Non-Public Information	5
Personal Securities Transactions	5
Quarterly Transaction Reports	5
Personal Trading Procedures	6
Initial Public Offering and Private Placements	6
Reporting Violations	6
Protection of Material Non-Public Information	7
Advisors and Supervised Persons	7
Gifts and Entertainment	7
Communication with Clients	8
Supervision, Review of Enforcement	8
Form ADV Disclosure	9
Initial Certification of Compliance	10

Purpose and Adoption

Scholar Raise, LLC, hereby formally adopts a code of ethics for current and future employees as required under the Investment Advisers Act of 1940. The purpose of which is to promote compliance with the fiduciary standards for advisors and personnel of Scholar Raise, LLC; to better inform the standards of requirements that all advisors must abide by; to prevent fraud by reinforcing the principals that must govern the conduct of the firm; to preclude activities which may lead or give the appearance of conflicts of interest, misuse of nonpublic information; and to be as transparent and open as possible with clients, prospective clients, and the public at large. The provisions of the Code of Ethics are not all-inclusive. Rather, they are intended to guide employees in applying the Code of Ethics to all their actions and communications with clients.

Definitions

For the purposes of this Code, the following definitions shall apply:

“Access Person” means any supervised person who: has access to non-public information regarding any clients’ purchase or sale of securities or is involved in making securities recommendations to clients that are nonpublic.

“Account” means accounts of any employee and includes accounts of the employee’s immediate family members (any relative by blood or marriage living in the employee’s household), and any account in which he or she has a direct or indirect beneficial interest, such as trusts and custodial accounts or other accounts in which the employee has a beneficial interest, controls or exercises investment discretion.

“Beneficial Interest” includes not only securities that an Access Person owns directly, and not only securities owned by others specifically for the supervised person’s benefit, but also securities held by the Access Persons’ spouse, minor children and relatives who live full time in his or her home; and securities held by another person if by reason of any contract, understanding, relationship, agreement or other arrangement the Access Person obtains substantially equivalent to ownership.

“Employee” is defined as any employee, director, general partner, trustee (where the registrant is a business trust), officer, consultant or adviser."

“Insider” includes officers, directors, and supervised persons of a company. Temporary insiders can also include, among others, a company’s law firm, accounting firm, consulting firm, banks, and the supervised persons of such organizations.

“Security” means any note, stock, treasury stock, bond, debenture, evidence of indebtedness, certificate of interest, option or participation in any profit-sharing agreement, collateral-trust certificate, pre-organization certificate or subscription, transferable share, investment contract, voting-trust certificate, certificate of deposit for a security, fractional undivided interest in oil, gas, or other mineral rights, or, in general, any interest or instrument commonly known as a “security”, or any certificate of interest or participation in, temporary or interim certificate for, receipt for, guarantee of, or warrant or right to subscribe to or purchase, any of the foregoing; provided,

however, that "security" shall not mean securities issued by the government of the United States, bankers' acceptances, bank certificates of deposit, commercial paper, repurchase agreements and other high quality short term debt instruments, shares of money market funds, transactions in units of a UIT if the UIT is invested exclusively in unaffiliated mutual funds, transactions and holdings in shares of mutual funds, unless the adviser or a control affiliate acts as the investment adviser or principal underwriter for the fund, variable annuity contracts and variable life insurance policies.

"Supervised Person" means any partner, officer, director (or other person occupying a similar status or performing similar functions), or employee of an investment adviser, or other person who provides

Standards of Business Conduct and Compliance.

All employees of Scholar Raise, LLC, are required, at minimum, to maintain a reasonable standard of business conduct and ethics and are required to reasonably follow and comply with any and all valid federal or state securities laws. It is the responsibility of all supervised persons to ensure business is conducted with the highest level of ethical and reasonable standards of conduct.

In addition, an employee of this firm is required to maintain the fundamental principles of honesty, integrity, and openness in all communications and decisions.

Employees are encouraged to not only meet this standard but exceed them.

To this end, advisory supervised persons are required to maintain the following standards:

- Compliance with all Covered Laws, including, but not limited to, federal securities laws.
- Compliance with the Firm's policies and procedures, which shall be updated from time to time.
- Honest and fair dealings with clients.
- Disclosure to clients of conflicts of interest.
- Exercise diligence in making investment recommendations or taking investment actions, including but not limited to maintaining objectivity, considering the suitability of an investment for a client or portfolio, and keeping appropriate records.
- Immediate disclosure to the Firm's management of matters that could create a conflict of interest, constitute a violation of government or regulatory law, rule or regulation or constitute a violation of the Firm's policies and procedures.
- Ensure security and confidentiality of customer records and information against unauthorized access to or use of customer information. Protect against both anticipated threats and hazards to security or integrity of customer records and information.

As part of this requirement, supervised persons are not permitted, in connection with the purchase or sale, directly or indirectly, of a security held or to be acquired by a client:

- To defraud such client in any manner.
- To mislead such client, including by making a statement that omits material facts.
- To engage in any act, practice or course of conduct which operates or would operate as a fraud or deceit upon such client.
- To engage in manipulative practice with respect to such client.
- To engage in manipulative practice with respect to securities, including price manipulation.

Protection of Material Non-Public Information.

All employees of Scholar Raise, LLC, are required to make reasonable efforts to prevent access to material non-public information about the adviser's securities recommendations, client securities holdings, and transactions by individuals who do not need the information to perform their duties.

All employees are encouraged to report any violations of this policy, be they accidental or intentional. Confidentiality will be maintained to protect any good faith reporting of violations of this policy.

Those who intentionally violations of this policy will be reported, documented, and potentially terminated for their actions. However, any accusations of misconduct or intentional violations of this policy will be investigated and any persons accused of such actions will be permitted opportunity to explain, deny, or counter the accusations.

Any employee who in good faith accidentally violated this policy will be given a warning and will be required to attended an internal formal meeting to discuss potential methods of better securing confidential information.

The Firm will maintain reasonable safeguards to prevent unauthorized access to sensitive client information.

Personal Securities Transactions.

Any and all supervised persons, also known as Access Persons, employed by this firm are required to report their personal securities transactions and holding.

Access Person is defined as any supervised person who has access to nonpublic information regarding clients' purchase or sale of securities, or any person involved in making securities recommendations to clients, or any person has access to such recommendations if the recommendations are nonpublic. Any administrative, technical, or clerical personnel may be considered an Access Person if they position or duties gives them aces to the nonpublic information.

Access Persons must provide the firm with a complete report of their securities holdings when the Access Person is first hired to the company. Reports shall be provided by the Access Persons at least once per year annually. All reports must be current as of the date not more than forty-five (45) days prior to the individual becoming an Access Person or the date the report is submitted.

Quarterly Transaction Reports

All Access Persons must make a quarterly report of all personal securities transactions that they have been engaged in. All such reports are due no later than thirty (30) days after the close of the calendar quarter.

If there exists only one (1) Access Persons working for the firm, then said person is required to maintain a record of his or her holdings and transactions.

Personal Trading Procedures

Security Advisors are encouraged but not required to implement the following policies in their trading procedures:

- To obtain prior written approval from the firm before Access Persons can place a personal securities transaction.
- To maintain a list of issuers of securities that the advisory firm is analyzing or recommending for client transactions and prohibitions on personal trading in securities of those issuers.
- To maintain a restricted list of issuers that the advisory firm has inside information and prohibition on any trading (personal or for clients) in securities of those issuers.
- To have scheduled "Blackout Periods" when client securities traders are being placed or recommendations are being made and Access Persons are not permitted to place personal securities transactions.
- To have reminders that investment opportunities must be offered first to clients before the advisers or its employees may act on them.
- To have prohibitions or restrictions on "short-swing" trading and market timing.
- To require trade only through certain brokers, or limitations on the number of brokerage accounts permitted.
- To have procedures for assigning new securities analysis to employees whose personal holdings do not present apparent conflicts of interest.

Initial Public Offering and Private Placements

All Access Persons are required to obtain the adviser's approval before investing in an initial public offering (IPO) or private placement.

If the Firm has at the time, only one (1) Access Persons, employed by the company then pre-clearances is not required.

Reporting Violations

Any known or suspected violations of this Code of Ethics must be promptly reported to the Firm's Chief Compliance Officer, or if no person currently holds that position, then the person with the highest authority to act.

Advisors are required to maintain records of any reported violations of the Code of Ethics.

Protection of Material Non-Public Information

Insider trading is prohibited by law. Penalties associated with insider trading can be severe to both the individual and the Firm (include fines or damages up to three times the amount of any profit gained) even if the supervised person did not personally benefit from the violation. Supervised persons are prohibited from trading (personally or on behalf of others) while in possession of material, non-public information ("MNPI"). Supervised persons may not communicate MNPI to others who may act on such information. It is important to avoid the appearance of impropriety and to exercise good judgement when relaying information to others that is obtained as a result of your involvement with the Firm.

Material Nonpublic Information is information that would affect the market value or trading of a security and that has not been disseminated to the general public. It is considered insider information. Information is considered to be "material" if its dissemination to the public would likely affect the market value or trading price of an issuer's securities (i.e. stock), or if it is information which, if disclosed, would likely influence a reasonable investor's decision to purchase or sell an issuer's securities. Information is considered to be nonpublic when it has not been adequately disclosed to the general public. Information ceases to be material, nonpublic information only when it has been widely disseminated to the public or is no longer material. Scholar Raise, LLC strictly prohibits insider trading as defined above. If an associate believes he/she may have access to MNPI through the course of fulfilling his/her duties, they are to report it to the Chief Compliance Officer immediately. The Chief Compliance is responsible for making the final determination regarding whether the information is MNPI.

Advisors and Supervised Persons

Any advisor or Access Person is required to provide any employee under their supervision with a copy of the Code of Ethics, any subsequent amendments. The supervised person must acknowledge, in writing, the receipt of the Code of Ethics. Advisors must also provide adequate training of their supervised persons so that they may properly comply with the Code of Ethics.

Any advisor or Access Person who had any employee under their supervision is required to maintain and enforce the code of ethics and will have the primary responsibility to enforce these code of ethics

Gifts and Entertainment

The Firm has a duty to disclose potential and actual conflicts of interest to its clients. Supervised persons may not use confidential information or otherwise take inappropriate advantage of their positions for the purpose of furthering private interest or as a means of making personal gain. The Firm's policy with respect to gifts and entertainment is as follows:

- Giving, receiving or soliciting gifts in a business may give rise to an appearance of impropriety or may raise a potential conflict of interest.

- Supervised persons should not accept or provide any gifts or favors that might influence the decisions you or the recipient must make in business transactions involving the Firm, or that others might reasonably believe would influence those decisions.
- Modest gifts and favors, which would not be regarded by others as improper, may be accepted or given on an occasional basis. Entertainment that satisfies these requirements and conforms to generally accepted business practices also are permissible.

Communication with Clients

All registered advisors are required to provide copies of the Code of Ethics to the clients and to make reasonable efforts to describe the Code so that the clients may make an informed decision in regards to any investment agreements between themselves and Scholar Raise, LLC.

Supervision, Review of Enforcement

The Chief Compliance Officer or delegate will use best efforts in providing supervision over the activities of persons who act on the Firm's behalf in order to prevent and detect violations of the Code of Ethics by such persons. Oversight Duties include, but are not limited to:

- Implementing an educational process for the Firm's compliance and supervisory procedures and controls to help ensure compliance with the Covered Laws.
- Ensuring that supervised persons fully understand the Firm's compliance policies and procedures.
- Establishing an audit review of the Firm's operations and its compliance policies and procedures to help ensure that the Firm has a system designed to provide reasonable assurance that the Firm's compliance policies and procedures are effective and are being followed
- Reviewing advisory supervised person's personal securities transactions and reports. Upon discovering that any person has failed to comply with the requirements of this Code of Ethics, the Firm may impose on that person whatever sanctions the CCO and management consider appropriate under the circumstances, including censure, suspension, limitations on permitted activities, monetary fines, or termination of employment. Each employee is required to certify that he or she has read, understands and has complied with (or, in the case of a newly hired employee, will comply with) the Code.

Form ADV Disclosure

Form ADV (Part 2A) gives a general description of the Firm's Code of Ethics policy and states that the Firm will provide a copy of the Code to current or prospective clients upon request.

Certification of Compliance

Certification

Supervised persons will be provided with a copy of the Code and must initially certify to the CCO that they have: (i) received a copy of the Code; (ii) read and understand all provisions of the Code; (iii) agreed to abide by the Code; and (iv) reported all account holdings as required by the Code. Certification is required upon commencement of employment using the attached form.

PLEASE NOTE: All Code of Ethics violations must be immediately reported to the CCO.

Initial Certification of Compliance

I hereby acknowledge receipt of the Independent Financial Partners Code of Ethics (the "Code"). I hereby certify that I:

(a) recently have read the Code.

(b) acknowledge that I am subject to the provisions of the Code;

and (c) will comply with the Code.

Name: _____ (Please Print Clearly)

Signature: _____

Date: _____