

Item 1: Cover Page



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March 22, 2022

THIS BROCHURE PROVIDES INFORMATION ABOUT THE QUALIFICATIONS AND BUSINESS PRACTICES OF RICHR MONEY LLC. IF YOU HAVE ANY QUESTIONS ABOUT THE CONTENTS OF THIS BROCHURE, PLEASE CONTACT US AT 951-438-7424. THE INFORMATION IN THIS BROCHURE HAS NOT BEEN APPROVED OR VERIFIED BY THE U.S. SECURITIES AND EXCHANGE COMMISSION (“SEC”) OR ANY STATE SECURITIES AUTHORITY. REGISTRATION AS AN INVESTMENT ADVISER DOES NOT IMPLY A LEVEL OF SKILL OR TRAINING.

ADDITIONAL INFORMATION ABOUT RICHR MONEY LLC ALSO IS AVAILABLE ON THE SEC’S WEBSITE AT WWW.ADVISERINFO.SEC.GOV.

The delivery of this brochure (the “Brochure”) at any time does not imply that the information contained herein is correct as of any time subsequent to the date shown above. This Brochure will supersede all other documents containing information about us.

Item 2: Material Changes

This brochure constitutes part of the initial filing with the SEC by Richr Money LLC

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Item 4: Advisory Business

Firm Description

Richr Money LLC (hereinafter referred to as “Richr Money”, the “Firm”, “we”, “us”, “our”) is a Delaware corporation with its principal office located in Miami, Florida and is registered with the Securities and Exchange Commission (the “SEC”) as an investment adviser. The Firm was formed in February 2022 and is a subsidiary of Richr Inc. Richr Inc. is majority owned by Glenn Orgin.

Richr Money provides investment advisory services to clients, including retail clients, exclusively through an investment services technology platform offered only through a digital application (the “App Platform”) accessible through a web browser. Richr Money is a technology company that owns and maintains the App Platform through which advisory clients receive investment recommendations to invest in individual U.S. securities. At this time, we are only providing access to investments in three (3) exchange traded funds (“ETFs”). All investment activities and recommendations are provided directly by Richr Money via the App Platform. Clients execute trades at their own will.

The Firm offers limited research on the issuer of the securities that are recommended to the client which can be seen via the App Platform. The research data is provided by several different sources at this time such as Vanguard. While the Firm provides recommendations with respect to stocks solely through the App Platform, the client makes the ultimate decision regarding the purchase or sale of such stock purchases.

Richr Money offers non-discretionary investment recommendations and advisory services to individual investors. Richr Money interacts with investment advisory clients, as well as prospective clients, solely through the App Platform. Richr Money does not offer financial planning services, tax, accounting, or legal advice.

Richr Money utilizes the App Platform to collect information with respect to each client and prospective clients and to deliver account notifications and content, and to provide Richr Money’s investment recommendations.

Upon account opening (“Client Onboarding”), the client will be prompted to complete a series of questions that will be used, in combination with other available client information collected through the App Platform prior to and/or after account opening including banking information, to deliver an investment recommendation. These questions are important to the development of the investment recommendation.

Richr Money’s algorithm suggests certain stock investments via the App Platform based on the answers the client provides to the initial questionnaire completed by the client during Client Onboarding. The securities suggestions will be delivered for viewing over the internet via the App Platform. The App Platform will show a risk rating, price performance and financial data for each security suggestion. Each client is responsible for ultimately deciding whether to accept and act upon the suggested recommendations. Clients also have the ability to search for securities within

the App Platform that have not been recommended and decide whether to purchase those securities.

Client Onboarding is only complete once a client (i) has linked the client's bank account ("Funding Account") to the Firm's custodian via the App Platform. No staff at the Firm will have access to a client's bank account information nor will staff at the Firm have access to a client's login credentials; and (ii) has accepted and countersigned Richr Money's investment advisory agreement electronically. Only when Client Onboarding is complete will a client have the availability to purchase securities via the App Platform.

Clients should consider that Richr Money primarily uses electronic means to provide customer support. To receive customer support, clients may contact us using email or through the App Platform. Clients and prospective clients should be comfortable communicating through those channels. Further, clients should be comfortable with not interacting directly with investment advisory personnel.

Richr Money reserves the right to deny any prospective clients access to the Richr Money App Platform and to terminate client accounts for reasons related, but not limited, to unsuitability and/or if clients fail to timely maintain financial and other information previously provided by the client on the App Platform or update this information on at least an annual basis.

A client's failure to timely update their information in the App Platform could materially impact the quality and applicability of Richr Money's investment recommendations.

During the Client Onboarding process, the client will also be prompted to simultaneously open a brokerage account held by the designated custodian in order to execute any trades. The independent custodian will hold client funds and securities.

At any time, clients may terminate an account, or withdraw all or part of an account. See below (Fees and Compensation) for more information regarding fees, including withdrawal and administrative charges.

Item 5: Fees and Compensation

Currently, we do charge fees for our investment advisory services which includes access to the App Platform up to 39 basis points per year of the client's assets under management. We expect to waive fees for clients for limited periods of times based on factors such as opening account balances and at such time will update this Brochure. At such time, we do not expect fees to be negotiable.

Clients may be assessed fees by the custodian in conjunction with transactions, account maintenance, etc. Such fees are separate from the fees that we collect, and we do not receive any portion of them. Currently those fees are 11 basis points per year of the client's assets under management. Those fees may change and at such time we will update this Brochure.

Additional Client Fees

There are no sales loads, brokerage fees, mark-ups, mark-downs, spreads paid to market makers, or brokerage termination or account surrender fees associated with our program. A client may, however, incur certain separate charges imposed by the custodian such as: wire transfer and electronic fund fees, retirement account custodial or account termination fees, in addition to certain taxes on non- retirement brokerage accounts.

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

Richr Money does not accept performance-based fees and does not engage in side-by-side management.

Item 7: Types of Clients

Richr Money provides investment advice to individuals, primarily those individuals that have sold a home. There is no account size minimum.

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

Richr Money uses a passive management style of investing to recommend equity securities. Richr Money currently only offers for investment three (3) exchange traded funds. Through the App Platform, Richr Money provides its clients with brief snapshots of information such as financial data, profit and loss, and balance sheet for equity securities.

Clients are advised that investing in securities involves risk of loss that they should be prepared to bear.

Investment Strategies

Richr Money does not actively manage client accounts. Investors will only be provided with a recommendation that they either accept or reject. Clients can also choose to search for other companies within the App Platform to invest in. All client accounts are self-directed. Richr Money's investment advisory services are only offered through electronic means, e.g., via the App Platform.

In order to meet its objective of providing clients a user-friendly access to investing, Richr Money's recommendations will be based on information collected by Richr Money through the App Platform such as a client's answers to the Richr Money personal financial summary questionnaire which is part of the sign-up process.

Clients are requested to provide information, which in combination with other available client information collected through the App Platform, guides Richr Money in making a recommendation for that particular investor. Richr Money makes use of an algorithm to process a client's answers to a series of questions and to make an investment recommendation. The accuracy of the data provided by the client is important to their investment recommendation. Richr Money does not verify the information received from the client. Richr Money is expressly authorized to rely on information provided by the client when making investment recommendations.

Investment recommendation(s) is/are limited to account(s) of clients maintained on the Richr Money App Platform and do not take into consideration client accounts held outside of Richr Money. Richr Money does not consider a client's personal tax situation when making stock recommendations. Clients should consult with their own tax advisor when considering investing for their own account.

We currently offer only non-discretionary investment management services. Clients retain full investment discretion over the implementation of investment decisions of each stock recommendation. Clients are also free to purchase other stock offered by Richr Money that have not been recommended or offered based on a client's interests. Clients are free to accept or reject any recommendation from Richr Money.

Following are some of the risks associated with Richr Money's investment strategy:

The Firm employs proprietary and non-proprietary algorithms in order to produce risk adjusted stock portfolios based upon data provided by the client. The Firm tailors such

portfolios to meet the clients stated investment goals and targets. The Firm offers tailored stock portfolios, based upon data provided by the client, but does not generate recommendations pertaining to other securities or assets classes, nor does the Firm factor in other assets held by a client when the Firm generates stock investment recommendations.

The Firm's proprietary models can rebalance client portfolios as the client updates their account with new data. Also, the Firm can recommend portfolio changes based on time passing, or changes in asset values and other economic variables.

The Firm seeks to determine appropriate stock recommendations for each client typically through the use of a questionnaire offered through the Firm's app. The Firm limits its stock recommendations to publicly traded stocks and ETFs. There is no assurance that the Firm can achieve positive results from its recommendations or that such recommendations will meet a client's needs or provide any level of income. Please read the Firm's Terms and Conditions carefully. Engaging in stock transactions involves risk, including the possible loss of principal.

Risk Factors

Specific Risks Associated with ETFs. ETFs represent an interest in a passively managed portfolio of securities and financial instruments selected to replicate a securities or financial instruments index. Unlike open-end mutual funds, the shares of ETFs are not purchased and redeemed by investors directly with the ETF, but instead are purchased and sold through broker-dealers in transactions on an exchange. Because ETF shares are traded on an exchange, they may trade at a discount from or a premium to the net asset value per share of the underlying portfolio of securities or financial instruments. In addition to bearing the risks related to investments in securities or financial instruments, investors in ETFs intended to replicate an index bear the risk that the ETFs performance may not correctly replicate the performance of the index. Investors in ETFs, closed-end funds and other investment companies bear a proportionate share of the expenses of those funds, including management fees, custodial and accounting costs, and other expenses. As such, clients are subject to layering of such fees. Trading in ETF and closed-end fund shares also entails payment of brokerage commissions and other transaction costs.

Equity Securities. Market prices of equity securities generally, and of certain companies' equity securities more particularly, frequently are subject to greater volatility than prices of fixed income securities. Market prices of equity securities as a group have dropped dramatically in a short period of time on several occasions in the past, and are likely to do so again in the future. In addition, actual and perceived accounting irregularities may cause dramatic price declines in the equity securities of companies reporting such irregularities or which are the subject of rumors of accounting irregularities. Common stock and similar equity securities generally represent the most junior position in an issuer's capital structure and, as such, generally entitle holders to an interest in the assets of the issuer, if any, remaining after all more senior claims to such assets have been satisfied. Holders of common stock generally are entitled to dividends, only if and to the extent declared by the governing body of the issuer, out of income or other assets available after making interest, dividend and any other required payments on more senior securities of the issuer.

Cybersecurity Risks. The Firm's information and technology systems may be vulnerable to damage or interruption from computer viruses, network failures, computer and telecommunication failures, infiltration by unauthorized persons and security breaches, usage errors by its professionals, power outages and catastrophic events such as fires, tornadoes, floods, hurricanes and earthquakes. Although the Firm has implemented various measures to manage risks relating to these types of events, if these systems are compromised, become inoperable for extended periods of time or cease to function properly, the Firm may have to make a significant investment to fix or replace them. The failure of these systems and/or of disaster recovery plans for any reason could cause significant interruptions in the Firm's operations and result in a failure to maintain the security, confidentiality or privacy of sensitive data, including personal information relating to investors (and the beneficial owners of investors). Such a failure could harm the Firm's reputation or subject it or its affiliates to legal claims and otherwise affect their business and financial performance. Additionally, any failure of the Firm's information, technology or security systems could have an adverse impact on its ability to manage client accounts.

Investments in Non-U.S. Investments. From time to time, the client may invest and trade a portion of its assets in non-U.S. securities and other assets (through ADRs and otherwise), which will give rise to risks relating to political, social and economic developments abroad, as well as risks resulting from the differences between the regulations to which U.S. and foreign issuers and markets are subject. Such risks may include:

- Political or social instability, the seizure by foreign governments of company assets, acts of war or terrorism, withholding taxes on dividends and interest, high or confiscatory tax levels, and limitations on the use or transfer of portfolio assets.
- Enforcing legal rights in some foreign countries is difficult, costly and slow, and there are sometimes special problems enforcing claims against foreign governments.
- Foreign securities and other assets often trade in currencies other than the U.S. dollar, and the client may directly hold foreign currencies and purchase and sell foreign currencies through forward exchange contracts. Changes in currency exchange rates will affect the client's net asset value, the value of dividends and interest earned, and gains and losses realized on the sale of investments. An increase in the strength of the U.S. dollar relative to these other currencies may cause the value of the client's investments to decline. Some foreign currencies are particularly volatile. Foreign governments may intervene in the currency markets, causing a decline in value or liquidity of the client's foreign currency holdings. If the client enters into forward foreign currency exchange contracts for hedging purposes, it may lose the benefits of advantageous changes in exchange rates. On the other hand, if the client enters forward contracts for the purpose of increasing return, it may sustain losses.
- Non-U.S. securities, commodities and other markets may be less liquid, more volatile and less closely supervised by the government than in the United States. Foreign countries often lack uniform accounting, auditing and financial reporting standards, and there may be less public information about the operations of issuers in such markets.

Risks Associated with Non-Diversification. The Firm may sometimes concentrate holdings in industries, geographic regions or companies which the Firm determines will provide the best opportunity for attractive risk-adjusted returns. The concentration of assets in a small number of issuers, in any one industry or a small number of industries, or in a single industry would subject clients to a greater degree of risk with respect to the failure of one or a few investments or with respect to economic variations in relation to such industry or industries.

Hedging Transactions. Investments in financial instruments such as forward contracts, options, commodities and interest rate swaps, caps and floors, and other derivatives are commonly utilized by investment funds to hedge against fluctuations in the relative values of its portfolio positions as a result of changes in currency exchange rates, in interest rates and in the equity markets or sectors thereof. Any hedging against a decline in the value of portfolio positions does not eliminate fluctuations in the values of portfolio positions or prevent losses if the values of such positions decline, but establishes other positions designed to gain from those same developments, thus moderating the decline in the portfolio positions' value. Such hedging transactions also limit the opportunity for gain if the value of the portfolio positions should increase. Moreover, it may not be possible for a client account to hedge against a fluctuation at a price sufficient to protect such client's assets from the decline in value of the portfolio positions anticipated as a result of such fluctuations. For example, the cost of options is related, in part, to the degree of volatility of the underlying instruments or assets. Accordingly, options on highly volatile instruments or assets may be more expensive than options on other instruments or assets and of limited utility in hedging against fluctuations in their prices.

We are not obligated to establish hedges for your account positions. To the extent that hedging transactions are effected, their success is dependent on your ability to correctly predict movements in the direction of currency and interest rates and the equity markets or sectors thereof.

Market or Interest Rate Risk. The value of a client's holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad. The programs recommended by the Firm may invest client accounts, from time to time, in fixed income securities and instruments. The price of most fixed income securities move in the opposite direction of the change in interest rates. For example, as interest rates rise, the prices of fixed income securities fall. If a client account holds a fixed income security to maturity, the change in its price before maturity may have little impact on such account's performance. However, if the account has to sell the fixed income security before the maturity date, an increase in interest rates could result in a loss to such account.

Inflation Risk. When any type of inflation is present, a dollar today will not buy as much as a dollar next year because purchasing power is eroding at the rate of inflation. Inflation risk results from the variation in the value of cash flows from a security due to inflation, as measured in terms of purchasing power. For example, if a client account purchases a 5-year bond in which it can realize a coupon rate of 5%, but the rate of inflation is 6%, then the purchasing power of the cash flow has declined. For all but inflation linked bonds, adjustable bonds or

floating rate bonds, a client account may be exposed to inflation risk because the interest rate the issuer promises to make is fixed for the life of the security. To the extent that interest rates reflect the expected inflation rate, floating rate bonds have a lower level of inflation risk.

Domestic Equity Market Risks

Under strategies utilizing equity securities, clients are subject to the risk that stock prices may fall over short or extended periods of time. Individual companies may report poor results or be negatively affected by industry and/or economic trends and developments. The prices of securities issued by such companies may suffer a decline in response. These factors contribute to price volatility, which is the principal risk of investing in equity securities.

Dollar-Based Transactions and Fractional Shares

A Fractional share program allows clients to purchase securities in dollar amounts rather than share quantities. Trading in fractional shares has unique risks and limitations that clients should understand prior to participation. Fractional shares may not be liquid. Fractional shares are not transferable. In the event of an account closing or transfer to another firm, the fractional shares will likely need to be liquidated, resulting in potential fees. Fractional shares cannot be put into certificate form and mailed. Holders of fractional shares will not have voting rights for the fraction of a share owned, even if more than .50 shares are in their account.

Investment Strategy and Method of Analysis Material Risks

We cannot guarantee that an investment objective or planning goal will be achieved. As an investor, each client must be able to bear the risk of loss that is associated with their account, which may include the loss of some, or all principal invested.

Company Risk

When investing in securities, there is always a certain level of company or industry specific risk that is inherent in each company or issuer. For example, there is the risk that a company will perform poorly or have its value reduced based on factors specific to the company or its industry. This is also referred to as unsystematic risk and can be reduced or mitigated through diversification.

Use of Algorithms

Richr Money incorporates computer-based technology to make investment recommendations primarily through the use of algorithms. Changes to the algorithmic code could have material effects on a client's stock recommendations. Richr Money's algorithms may not perform as intended for a variety of reasons, including but not limited to incorrect assumptions, changes in the market, and/or changes to data inputs. Richr Money may modify periodically these algorithms, or a computer system's code or underlying assumptions, and these changes may have unintended consequences. Additional information regarding relevant considerations for clients considering an automated digital investment advisory program (sometimes referred to as a "robo

advisor”) is contained in the Investor Bulletin from the Securities and Exchange Commission available at https://www.sec.gov/oiea/investor-alerts-bulletins/ib_robo-advisers.html.

Cybersecurity Risk

The information and technology systems of Richr Money, as well as of key service providers, including third-party vendors, central agents, exchanges, clearing houses, and other financial institutions (including the custodian), are vulnerable to potential damage or interruption from computer viruses, network failures, computer and telecommunication failures, infiltration by unauthorized persons and security breaches, usage errors by their respective professionals, power outages and catastrophic events such as fires, tornadoes, floods, hurricanes and earthquakes. Richr Money and client accounts could be adversely impacted if any of the aforementioned parties is the subject of a cyber- attack or other information security event. Although Richr Money has implemented various measures designed to seek to manage risks relating to these types of events, if these systems are compromised, become inoperable for extended periods of time or cease to function properly, it may be necessary for Richr Money or a service provider to make a significant investment to fix or replace them and to seek to remedy the effect of such issues. The failure of these systems and/or of disaster recovery plans for any reason could cause significant interruptions in Richr Money’s ability to transact business on behalf of its clients and could result in a failure to maintain the security, confidentiality or privacy of sensitive data, including personal information. While many investment advisers are subject to the same or similar risks in respect of their operations, these risks are particularly acute with respect to Richr Money due to Richr Money’s fundamental dependence on technology.

Research Data

When research and analyses are based on commercially available software, rating services, general market and financial information, or due diligence reviews, a firm is relying on the accuracy and validity of the information or capabilities provided by selected vendors, rating services, market data, and the issuers themselves. Therefore, while our firm makes efforts to determine the accuracy of the information received, we cannot predict the outcome of events or actions taken or not taken, or the validity of all information researched or provided which may or may not affect the advice regarding or investment management of an account.

Limited Nature of the Recommendations

The use of algorithms carries the risk that changes to the algorithm’s code may not have the desired effect with respect to a client’s account. While this risk increases if changes to an algorithm are insufficiently tested prior to implementation, even extensively tested changes may not produce the desired effect over time. The App Platform relies on a limited universe of inputs to generate a stock recommendation for each client from a limited universe of possible outputs. In particular, the App Platform currently generates suggested stock purchases based on a client’s response to questions provided by the client through the App Platform. Richr Money does not verify the completeness or accuracy of such information or consider any information regarding outside assets, concentration, debt, or other accounts a client may have with any third party. The functionality of the App Platform is partly dependent upon information provided by the third-

party custodian, and other external sources, meaning that performance of the App Platform could be impacted by issues with the delivery or the accuracy of the information provided.

Limited Nature and Scope of the Service

We do not provide comprehensive financial or tax planning or legal advice. Clients should seek the advice and counsel of their own tax, financial, and legal advisers. Richr Money only provides stock recommendations to individual investors. We do not provide investment advice to IRA or tax-exempt investors. We are not responsible for withholding any tax penalties that may apply to our clients or for any state or federal income tax withholding, except as may otherwise be required by applicable law. Richr Money's recommendations are limited based on the information clients provide through the App Platform, the limitations of which are further discussed above. Clients should take into consideration the limited nature of the service in evaluating the recommendations provided through the App Platform. Furthermore, the service: (a) is not a complete investment service; (b) does not account for multiple investment goals; (c) does not consider outside assets, concentration, debt, or other accounts a client may have with any third party; (d) offers a limited number of investments; (e) may not be suitable for all investors; and (f) relies on the information provided by clients in providing investment advice and does not verify the completeness or accuracy of such information.

There could be one or more products available in the investment community that are more appropriate than the investment products made available through the App Platform. Given the inherent limitations of the service, clients should carefully consider whether our service is the right investment solution for their savings and investing needs.

Risk of Loss

We cannot guarantee our analysis methods will yield a return. In fact, a loss of principal is always a risk.

You need to understand that recommendations made for your account by us are subject to various market, currency, economic, political and business risks. Despite our best efforts, the investment recommendations we make for you will not always be profitable nor can we guarantee any level of performance. Richr Money does not represent, warrant, or imply that the services or methods of analysis used can or will predict future results, successfully identify market tops or bottoms, or insulate clients from major losses due to market corrections or crashes. No guarantees are offered that clients' goals or objectives will be achieved. Further, no promises or assumptions can be made that the advisory services offered by Richr Money will provide a better return than other investment strategies. Investments in securities and other financial instruments involve risk of loss that investors must be prepared to bear. Below are certain risks associated with the strategies discussed above. This is a summary only. The specific risks applicable to a client will depend upon various factors.

Regulatory Changes

It is possible that changes in applicable laws and regulations may affect Richr Money's

operations. The consequences of additional regulation on the liquidity of markets and the functioning of the service (and, possibly, on Richr Money itself) cannot be predicted and may materially affect the investment advisory services offered by Richr Money.

Taxes

You are responsible for all tax liabilities and tax-return filing obligations arising from the transactions in your Richr Money account. We do not, and will not, offer tax advice to you and we strongly encourage you to seek the advice of a qualified tax professional. You should also understand that we are not responsible for attempting to obtain any tax credit or similar item or preparing and filing any legal document (including, but not limited to, proofs of claim) on your behalf.

Item 9: Disciplinary Information

There are no criminal or civil actions to report. There are no administrative proceedings to report.
There are no self-regulatory organization proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

Richr Money is not registered as or has a pending applications to become a: broker/ dealer, representatives of a broker/dealer, a Futures Commission Merchant, Commodity Pool Operator, Commodity Trading Advisor. Richr Money does not have any material relationships to our advisory business that would present a possible conflict of interest. We do not utilize nor select other advisers or third-party managers.

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

Richr Money's ethical and legal duty is to act at all times as a fiduciary to its clients. This means that Richr Money puts the interests of its clients ahead of its own and seeks to manage any perceived or actual conflict of interest that may arise in relation to our advisory services. Richr Money has adopted a Code of Ethics ("COE"), which is designed to ensure that it meets its fiduciary obligation to clients, enhances its culture of compliance within the firm, and detects and prevents any violations of securities laws.

Richr Money's COE establishes standards of conduct for Richr Money's officers and employees ("Supervised Persons") and is consistent with the Code of Ethics requirements of Rule 204A-1 under the Investment Advisers Act of 1940, as amended. The COE includes general requirements that all Supervised Persons comply with their fiduciary obligations to clients and applicable securities laws, and also contains specific requirements relating to, among other things, personal trading, insider trading, conflicts of interest, and confidentiality of client information. Richr Money's COE will be provided to any client or prospective client upon request.

Richr Money and its employees and affiliates may purchase, sell, or otherwise enter into transactions for their own accounts in securities and other instruments. Prior to, or simultaneously with, or after such transactions, Richr Money may, for its clients, via the App Platform, provide suggestions for purchasing stock involving any of these same securities or other instruments, and any related securities or instruments (including securities issued by the same issuer, options on such securities or instruments, and instruments convertible into such securities or instruments). Richr Money has adopted the Code of Ethics discussed above to address potential conflicts. Subject to certain restrictions, Richr Money and each of their employees personally may at any time hold, acquire, increase, decrease, dispose of or otherwise deal with positions in investments in which a Client may have an interest from time to time. Richr Money has no obligation to recommend or acquire for a client account a position in any security which it acquires or recommends on behalf of another client, or which an employee acquires for his or her own account.

Transactions affected for all client accounts are not aggregated or combined with employee's personal orders. All trades will be executed by DriveWealth, LLC ("DriveWealth"). Each client shall direct their trades to DriveWealth. In all instances Richr Money will act in the best interests of its clients.

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

Item 12: Brokerage Practices

DriveWealth was selected as our custodian based on the transaction fees relative to other custodians and the quality of their technology. Additional factors used to choose the custodian were the custodian's support services, reputation, and cost-benefit compared to other custodians. Richr Money requires clients to use DriveWealth as their custodian and executing broker.

Richr Money does not receive any research, products, or services from its custodian or another third-party (known as soft dollars) in connection with client securities transactions. Richr Money does not receive referrals from a broker-dealer or third party in exchange for using that broker dealer or third party.

Richr Money does not allow clients to direct brokerage to brokers other than DriveWealth.

Item 13: Review of Accounts

Richr Money provides its clients with access to their account information via the App Platform. DriveWealth, the client's custodian, is required to send account statements directly to clients no less frequently than quarterly. These statements and reports will be sent directly by DriveWealth to clients at their respective addresses of record or delivered electronically.

On a periodic basis, Richr Money will contact each client to request that the profile information previously provided be updated, if appropriate due to changes in circumstance. Richr Money will review accounts periodically to identify any accounts with a balance below the minimum balance. However, clients must promptly update the financial and other information they previously inputted through the App Platform if any of financial or other information changes. A client's failure to timely update this information could materially impact the quality and applicability of Richr Money's advice and recommendations.

Item 14: Client Referrals and Other Compensation

Richr Money does not directly compensate or receive compensation from other entities.

Item 15: Custody

Richr Money does not have actual custody of client funds or securities and does not provide custodial services to our clients. Client funds and securities are maintained at an independent qualified custodian as described in Item 4. Clients will receive statements directly from the qualified custodian at least quarterly. We urge clients to carefully review those statements and compare the custodial records to the reports that we provide them. The information in our reports may vary from custodial statements due to accounting procedures, reporting dates or valuation methodologies of certain securities.

Clients will receive account statements from the custodian and are urged to compare their statements to the account information provided by Richr Money.

Item 16: Investment Discretion

Richr Money does not accept investment discretion of its client's accounts.

Item 17: Voting Client Securities

Richr Money does not have, and will not accept, authority to vote client securities. Generally, clients receive their proxies or other solicitations directly from their custodial broker dealer or a transfer agent, as applicable, and should direct any inquiries regarding such proxies or other solicitations directly to the sender.

Item 18: Financial Information

Richr Money does not require or solicit prepayment of fees by clients six or more months in advance and is therefore not required to include a balance sheet for its most recent fiscal year.

Richr Money is not aware of any financial condition reasonably likely to impair its ability to meet contractual commitments to clients and has not been the subject of a bankruptcy petition at any time during the past ten years.