

# **Wealthramp, Inc.**

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

**Effective: August 16, 2023**

This Form ADV2A (“Disclosure Brochure”) provides information about the qualifications and business practices of Wealthramp, Inc. (“Wealthramp” or the “Advisor”). If you have any questions about the contents of this Disclosure Brochure, please contact us at via our website <http://Wealthramp.com>.

Wealthramp 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 through Wealthramp to assist you in determining whether to retain the Advisor.

Additional information about Wealthramp 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# 290683.

**Wealthramp, Inc.**  
<https://Wealthramp.com>

## **Item 2 – Material Changes**

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

### Material Changes

There have been no material changes to this Disclosure Brochure since the last filing and distribution to Clients.

### 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 Wealthramp.

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# 290683. You may also request a copy of this Disclosure Brochure at any time, by contacting the Advisor via our website <https://Wealthramp.com>.

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## **Item 4 – Advisory Services**

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### **A. Firm Information**

Wealthramp, Inc. (“Wealthramp” 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”).

Wealthramp is organized as a corporation under the laws of the State of Delaware, effective April 2019. Previously, Wealthramp was a corporation under the laws of the State of California. Wealthramp was founded in 2012. In November 2017, Wealthramp expanded its services to include solicitor referral services for registered investment advisors. Wealthramp is primarily owned by Pamela E. Krueger (President). Additional owners are investors and not control persons of the Advisor. This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by Wealthramp.

For questions regarding this Disclosure Brochure, please contact Diane Woolf (at [diane@Wealthramp.com](mailto:diane@Wealthramp.com)).

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

Wealthramp provides individuals, high net worth individuals, trusts, and estates (each referred to as an “Investor”) with an interactive, online financial advice matching platform at <https://Wealthramp.com>. The mission of Wealthramp is to match Investors with fiduciaries to assist the Investor with their financial needs.

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

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

#### Referrals

Users visiting <https://Wealthramp.com> and other electronic sites utilized by the Advisor will be offered access to the Wealthramp 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. The terms of the relationship between an Investor and an RIA/IAR are separate from any agreements between Wealthramp and those parties. Wealthramp DOES NOT provide investment advisory services to any Investor.

Wealthramp’s services are limited to making referrals to other registered investment advisers. The Advisor that the Investor ultimately chooses to work with is responsible for determining and implementing specific investment strategies for the Investor.

As part of Wealthramp’s vetting process, it is determined whether Advisors accessible through the Wealthramp website are registered as investment advisers and what their areas of focus and expertise are. Wealthramp does not review the ongoing performance of the third-party advisor, does not affect changes for the Investor account, and does not provide investment recommendations to the Investors. Wealthramp’s services are limited to making referrals to other registered investment advisers. The Advisor that the Investor ultimately chooses to work with is responsible for determining and implementing specific investment strategies for the Investor.

In consideration for its services, Wealthramp may receive a subscription fee or 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 Wealthramp 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.

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

Prior to engaging Wealthramp to provide services, each Investor must register via <https://Wealthramp.com> and agree to the Wealthramp 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 Wealthramp platform is provided.

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

Wealthramp does not offer a Wrap Fee Program.

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

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

## **Item 5 – Fees and Compensation**

Wealthramp is primarily compensated through referral fee arrangements with other registered investment advisors. Wealthramp is only compensated if an Investor engages an Advisor that has contracted with Wealthramp to share in the revenue generated by the Investor's relationship with an RIA.

Wealthramp does not charge a fee to Investors to utilize its platform at <https://Wealthramp.com>. RIAs and IARs that are accepted to the Wealthramp platform will be required to enter into a Solicitor Agreement with Wealthramp whereby Wealthramp is compensated on an ongoing basis if the Investor becomes a client of the RIA. Wealthramp provides the Investor with a Solicitor Disclosure Statement that details the revenue-sharing arrangement. Certain legacy RIAs and IARs have an arrangement to pay Wealthramp a subscription fee up to \$500 per month.

Investors are not charged for the use or access to the <https://Wealthramp.com> platform.

### **B. Fee Billing**

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

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

Investors may incur certain fees or charges imposed by third parties, other than Wealthramp, in connection with their investments. Wealthramp 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 Wealthramp. Investors may cancel their Wealthramp 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**

Wealthramp 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**

Wealthramp does not charge performance-based fees. Wealthramp 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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Wealthramp provides investment advisory services to individuals, high net worth individuals, trusts and estates. There is no fee or minimum level of wealth to use the website at <https://Wealthramp.com>.

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

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Wealthramp does not manage Investor assets, however, in matching Investors to Advisors, Wealthramp engages in a rigorous vetting process.

Wealthramp's process of selecting Advisors for its network consists of conducting due diligence on prospective Registered Investment Advisers ("RIA") and their Investment Adviser Representatives ("IARS"). The diligence process includes, but is not limited to, (1) review of each IARs ADV and other public records; and vetting of any unresolved material disciplinary disclosures; (2) review of the IARs education, work history, and professional designations; (3) review of RIA's fee structure and any conflicts of interest; and (4) extensive interview with Wealthramp management personnel to understand qualitative aspects of the RIA and the IAR. Generally, Wealthramp will not admit dual registered IARs onto the platform except in rare instances for advisors that otherwise pass the thorough vetting process and are believed to always act in their clients' best interests. Exceptions may include advisors that provide existing clients access to legacy commission-based 529 accounts, and advisors that on rare occasions and only at an Investor's request incorporate annuity investments into an Investor's portfolio. Such exceptions are rare and Wealthramp will fully disclose such exceptions.

Once the due diligence is complete and the RIA and IAR(s) are approved, Wealthramp may refer Investors to the approved IAR; however, Wealthramp cannot ensure that those Advisors will perform as desired, and Wealthramp has no control over the day-to-day operations of any recommended Advisors. Wealthramp would not be aware of certain activities at its recommended advisors, including without limitation, an Advisor engaging in unreported risks, investment style changes or even regulatory breaches or fraud. Additionally, Wealthramp cannot guarantee that an Investor's financial goals will be attained through its recommended Advisors. Investors should understand the inherent risks associated with any type of investments they participate in.

**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 for 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**

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**There are no legal, regulatory or disciplinary events involving Wealthramp or any of its Supervised Persons.** Wealthramp 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**

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No disclosures.

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

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Wealthramp 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 Wealthramp (our "Supervised Persons"). The Code was developed to provide general ethical guidelines and specific instructions regarding duties to the Investor. Wealthramp 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

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<https://Wealthramp.com>

the Advisor via the website <https://Wealthramp.com>.

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**Item 12 – Brokerage Practices**

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

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**Item 13 – Review of Accounts**

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Not applicable.

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

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Wealthramp is compensated by RIAs and IARs as detailed in item 5. Wealthramp works with employers and other businesses to provide access to Wealthramp's matching platform to their employees. Wealthramp may also pay third-parties a marketing fee for referring prospective users to the Wealthramp platform.

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**Item 15 – Custody**

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

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**Item 16 – Investment Discretion**

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

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**Item 17 – Voting Client Securities**

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

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**Item 18 – Financial Information**

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Neither Wealthramp, nor its management, have any adverse financial situations that would reasonably impair the ability of Wealthramp to meet all obligations to its Investors. Neither Wealthramp, nor any of its advisory persons, has been subject to a bankruptcy or financial compromise. Wealthramp 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.

## **Privacy Policy**

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Effective Date: August 16, 2023

### **Our Commitment to You**

Wealthramp, Inc. ("Wealthramp" or the "Advisor") is committed to safeguarding the use of personal information of our Clients (also referred to as "you" and "your") that we obtain as your Investment Advisor, as described here in our Privacy Policy ("Policy"). Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. Wealthramp (also referred to as "we", "our" and "us") protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

Wealthramp does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

**Wealthramp limits the information we collect to the Client's name, contact information and general information regarding their goals and objectives. Wealthramp does not collect non-public, personally-identifiable information or account information.**

### **How do we protect your information?**

To safeguard your information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client information. We require third parties that assist in providing our services to you to protect the personal information they receive from us.

### **Marketing Purposes**

Wealthramp does not disclose, and does not intend to disclose your information with non-affiliated third parties to offer you services, except for the matching services we provide. Please see the Terms of Use on <https://Wealthramp.com> for additional information.

### **Changes to our Privacy Policy**

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us. Periodically we may revise this Policy, and will provide you with a revised policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

### **Any Questions?**

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us via our website <https://Wealthramp.com>.