

Item 1: Cover Page

WiserAdvisor

Form ADV Part 2A Brochure

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This brochure provides information about the qualifications and business practices of Respond.com, Inc. doing business as WiserAdvisor Paladin ("WiserAdvisor"). If you have any questions about the contents of this brochure, please contact us at the telephone number or email address listed above. 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. WiserAdvisor is a registered investment adviser, but registration does not imply a certain level of skill or training.

Additional information about WiserAdvisor is also available on the SEC's website at www.adviserinfo.sec.gov and by searching for CRD# 321249.

Item 2: Material Changes

In this Item, WiserAdvisor is required to identify and discuss material changes since filing its last annual amendment. Since the latest brochure was published on March 27, 2023, WiserAdvisor acquired IndyFin's investor platform, and applicable references hereto were made throughout the brochure dated November 30, 2023. In this brochure update, WiserAdvisor is disclosing <https://addfinancialadvisors.com> as an additional website in Items 1 and 4.

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Item 4: Advisory Business

- A. WiserAdvisor (the “Adviser,” “we,” “us,” or “our”) is an investment adviser founded in 2022, registered with the U.S. Securities and Exchange Commission (“SEC”), and principally owned by Atul Jain.
- B. Our investment advisory services are limited to the selection of other independent and unaffiliated third-party investment advisers (“Third-Party Advisers”). We offer promoter/solicitor services (exclusively through our interactive website platforms (the “Platforms”), accessible at <https://www.wiseradvisor.com/>, <https://www.paladinregistry.com/>, <https://www.financialplanners.net/>, <https://www.financialadvisor.net/>, <https://www.rothira.org/>, <https://indyfin.com>, <https://addfinancialadvisors.com>, and <https://www.retirementplanning.net/>) that involve the referral of prospective advisory clients to such Third-Party Advisers with whom we have a written agreement and who compensate us for such referrals. We collect information from individuals exclusively through our Platforms and then suggest Third-Party Advisers that may be a fit for their investment advisory needs. After engaging our interactive website, the prospective client determines whether to enter into an advisory relationship with any Third-Party Adviser presented or made available to such prospective advisory client through our website. Incidental to the interactive website platform, we may also coordinate meetings between prospective advisory clients and third-party investment advisers purely in an administrative capacity.

As part of our vetting process, we determine whether the Third-Party Advisers we work with are registered as an investment adviser. We do not review the on-going performance of the Third-Party Adviser, do not effect transactions for any client’s account, and do not provide investment recommendations to clients. Individuals will receive a copy of the third-party adviser’s Form ADV Part 2 and should be aware that they can obtain additional investment advisory services directly from other advisers of the individual’s choice.

Our investment advisory services are limited to making referrals to other registered investment advisers based on the particular needs of a prospective advisory client. The Third-Party Adviser, if engaged by a referred individual, will determine and implement specific investment strategies for the referred individual. We are not tax or legal professionals and do not give legal or tax advice.

Since we do not otherwise render investment advice and limit our activities to facilitating referrals to Third-Party Advisers, we do not tailor any advisory services to the individual needs of prospective advisory clients after a referral is made; such personalized tailoring of financial planning and investment advisory services are performed by the Third-Party Adviser. To the extent a prospective advisory client desires to impose restrictions on investing in certain securities or types of securities, such restrictions may be implemented by the Third-Party Adviser at its sole discretion.

- C. Adviser does not participate in any wrap fee programs.
- D. Since our services are limited to making referrals to other registered investment advisers, we do not have any regulatory assets under management.

Item 5: Fees and Compensation

Prospective clients we refer to Third-Party Advisers will not incur any fees charged by us. However, the Third-Party Adviser to whom we refer will generally charge referred clients an advisory fee. Such advisory fees are not increased solely as a result of our referral. The specific amount to be paid by Third-Party Advisers to us will vary. However, the fees we earn from Third-Party Advisers generally take the form of a flat membership fee ranging from \$45 to \$5,600 per month, a flat per-lead fee equal to \$20 to \$350 per lead, and an appointment-setting fee of \$400. Again, such fees are not paid to us by referred clients, and are instead paid by Third-Party Advisers. Persons referred to a Third-Party Adviser by us will receive a disclosure statement that details the fee payment arrangement between us and the Third-Party Adviser.

Prospective advisory clients should be aware that they will likely incur an advisory fee charged by the Third-Party Adviser, as well as certain fees and expenses imposed by other independent and unaffiliated third-parties. Such other fees and expenses may include, for example, brokerage and other transaction costs, qualified custodian fees, mutual fund or exchange traded fund fees and expenses, mark-ups and mark-downs, spreads paid to market makers, wire transfer fees, check-writing fees, early-redemption charges, certain deferred sales charges on previously-purchased mutual funds, margin fees, charges or interest, IRA and qualified retirement plan fees, and other fees and taxes on brokerage accounts and securities transactions.

Neither we nor any of our supervised persons accept compensation for the sale of securities or other investment products.

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

Neither Adviser nor any of its supervised persons accepts performance-based fees (fees based on a share of capital gains or capital appreciation of the assets of a client).

Item 7: Types of Clients

Adviser provides technology-driven referral services to individuals who use the Platforms to be matched with Third-Party Advisers who may then provide those individuals with investment advisory services. Since we do not otherwise provide advisory services to any prospective clients, we do not have any applicable minimum account value requirement. However, the Third-Party Advisers on our Platforms may require such minimums.

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

We conduct due diligence on third-party investment advisers and their representatives that we refer individuals to.

For each investment adviser we consider their experience in providing financial advice including the number of clients they have as well as the amount of assets that they manage, professional certifications services offered, type of technology they use and more. We review the regulatory track record of the third-party investment advisers and do not accept investment adviser representatives with material disciplinary issues.

We do not recommend any particular method of analysis or investment strategy to prospective advisory clients. Such analyses and strategies are implemented solely by the Third-Party Advisers. However, prospective advisory clients should be aware that all forms of investing involve risk of loss that they should be prepared to bear, including analyses and investment strategies that are offered by a Third-Party Adviser. There can be no guarantee that portfolios managed by a Third-Party Adviser will continue to perform as expected, or will otherwise meet a prospective advisory client's expectations. Past performance does not guarantee future returns. Prospective advisory clients should independently and comprehensively evaluate any prospective investment adviser, including a Third-Party Adviser, as such evaluation and the ultimate engagement decisions rests solely with a prospective advisory client in his or her absolute discretion.

For a complete description of a Third-Party Adviser's methods of analysis, investment strategies, and risk of loss, please refer to such Third-Party Adviser's brochure.

Our process for referring individuals to Third-Party Advisers cannot ensure that those advisers will perform as desired and we will have no control over the day-to-day operations of any Third-Party Advisers. The methods of analysis and investment strategies used by Third-Party Advisers will be disclosed in their respective disclosure brochure.

Item 9: Disciplinary Information

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of Adviser's advisory business or the integrity of Adviser's management.

Item 10: Other Financial Industry Activities & Affiliations

- A. Neither Adviser nor any of its management persons are registered, or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.
- B. Neither Adviser nor any of its management persons are registered, or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.
- C. Neither Adviser nor any of its management persons have any relationship or arrangement with any related person below:
 - i. broker-dealer, municipal securities dealer, or government securities dealer or broker
 - ii. investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund)
 - iii. other investment adviser or financial planner
 - iv. futures commission merchant, commodity pool operator, or commodity trading advisor
 - v. banking or thrift institution
 - vi. accountant or accounting firm
 - vii. lawyer or law firm
 - viii. insurance company or agency
 - ix. pension consultant
 - x. real estate broker or dealer
 - xi. sponsor or syndicator of limited partnerships
- D. As described in Item 4, we limit our referrals to Third-Party Advisers with whom we have a written agreement and who compensate us for such referrals. This creates a financial incentive for us to refer prospective clients to such Third-Party Advisers, and therefore presents a conflict of interest. To the extent certain Third-Party Advisers pay us higher fees, this creates an incentive to refer you to such Third-Party Advisers instead of third-party advisers that pay us lower fees. We address this conflict of interest by fully disclosing it in this brochure, by additionally disclosing the compensation arrangement with applicable Third-Party Advisers at the time a referral is made, and by only referring prospective clients to Third-Party Advisers we believe to be in prospective clients' best interests.

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

- A. Adviser has adopted a code of ethics that will be provided to any client or prospective client upon request. Adviser's code of ethics describes the standards of business conduct that Adviser requires of its supervised persons, which is reflective of Adviser's fiduciary obligations to act in the best interests of its clients. The code of ethics also includes sections related to compliance with securities laws, reporting of personal securities transactions and holdings, reporting of violations of the code of ethics to Adviser's Chief Compliance Officer, pre-approval of certain investments by access persons, and the distribution of the code of ethics and any amendments to all supervised persons followed by a written acknowledgement of their receipt.
- B. Neither Adviser nor any of its related persons recommends to clients, or buys or sells for client accounts, securities in which Adviser or any of its related persons has a material financial interest.
- C. From time to time, Adviser or its related persons will invest in the same securities that a Third-Party Adviser may recommend to a prospective advisory client. However, we are not privy to these investment recommendations. As such, this is not anticipated to create a conflict of interest.
- D. From time to time, a Third-Party Adviser or its related persons will buy or sell securities for prospective advisory client accounts at or about the same time that Adviser or a related person may happen to buy or sell the same securities for its own (or the related person's own) account. However, we are not privy to these investment recommendations or the timing of when they may be made. As such, this is not anticipated to create a conflict of interest.

Item 12: Brokerage Practices

We do not recommend or utilize the services of broker-dealers.

Because we do not trade in any prospective advisory client accounts, we are not afforded the opportunity to engage in any order aggregation practices.

Item 13: Review of Accounts

We do not monitor or otherwise review prospective advisory client accounts. Prospective advisory clients are encouraged to proactively reach out to their Third-Party Adviser to discuss any changes to their personal or financial situation.

The custodial broker-dealer for prospective advisory clients should send account statements and reports directly no less frequently than quarterly. Such statements and reports will be mailed to prospective advisory clients at their address of record or delivered electronically, depending on the prospective advisory client's election. We do not provide prospective advisory clients any additional reports.

Item 14: Client Referrals and Other Compensation

We will enter into contractual agreements to act as a promoter/solicitor for Third-Party Advisers. Pursuant to these agreements, our compensation is derived entirely from Third-Party Adviser in consideration for the prospective client referrals we make through our Platforms..

Item 15: Custody

At no time will we accept custody of a prospective advisory client's funds or securities in the capacity of a custodial broker-dealer or otherwise, and at all times advisory accounts will be held by a third-party qualified custodian as agreed between a prospective advisory client and the Third-Party Adviser.

Item 16: Investment Discretion

We do not have discretion over client accounts at any time.

Item 17: Voting Client Securities

- A. Adviser does not have and will not accept authority to vote client securities.
- B. Prospective advisory clients will 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 or to the applicable Third-Party Adviser.

Item 18: Financial Information

- A. Adviser does not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance.
- B. Adviser has no financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients.
- C. Adviser has not been the subject of a bankruptcy petition at any time during the past ten years.