

## Item 1: Cover Page

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Form ADV Part 2A  
Disclosure Brochure

# RightWise Wealth, Inc.

Office Address:  
801 S Main St, Suite 210  
Las Vegas, NV 89101

Telephone:  
(702) 986-0868

Email:  
caitlyn@rightwisewealth.com

Website:  
[www.rightwisewealth.com](http://www.rightwisewealth.com)

March 25, 2024

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This brochure provides information about the qualifications and business practices of RightWise Wealth, Inc. Being registered as an investment adviser does not imply a certain level of skill or training. If you have any questions regarding this brochure, please contact RightWise Wealth at (702) 986-0868. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC), or by any state securities authority.

Additional information about RightWise Wealth, Inc., (CRD #324252) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

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## Item 2: Material Changes

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### Annual Update

The Material Changes section of this brochure will be updated annually or when material changes occur since the previous release of the Firm Brochure.

### Material Changes since the Last Update

- Updated services description
- Removal of heldaway asset management services
- Removal of minimum account size
- Updated asset management pricing

### Full Brochure Available

This Firm Brochure being delivered is the complete brochure for the Firm.

## Item 3: Table of Contents

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Item 1: Cover Page .....	1
Item 2: Material Changes.....	2
Annual Update .....	2
Material Changes since the Last Update .....	2
Full Brochure Available .....	2
Item 3: Table of Contents .....	3
Item 4: Advisory Business.....	4
Firm Description .....	4
Types of Advisory Services.....	4
Client-Tailored Services and Client-Imposed Restrictions .....	5
Wrap Fee Programs.....	5
Client Assets Under Management.....	5
Item 5: Fees & Compensation .....	7
Method of Compensation .....	7
Client Payment of Fees .....	8
Additional Client Fees Charged .....	8
Prepayment of Client Fees.....	8
External Compensation for the Sale of Securities to Clients.....	9
Item 6: Performance-Based Fees and Side-by-Side Management.....	10
Sharing of Capital Gains.....	10
Item 7: Types of Clients .....	10
Description.....	10
Account Minimums.....	10
Item 8: Methods of Analysis, Investment Strategies and Risk of Loss.....	11
Methods of Analysis.....	11
Investment Strategy.....	11
Security-Specific Material Risks.....	11
Item 9: Disciplinary Information .....	14
Criminal or Civil Actions .....	14
Administrative Enforcement Proceedings.....	14
Self-Regulatory Organization Enforcement Proceedings .....	14
Item 10: Other Financial Industry Activities and Affiliations .....	14
Broker-Dealer or Representative Registration.....	14
Futures or Commodity Registration .....	14
Material Relationships Maintained by this Advisory Business and Conflicts of Interest .....	14
Recommendations or Selections of Other Investment Advisors and Conflicts of Interest.....	14

Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading .....	15
Code of Ethics Description .....	15
Investment Recommendations Involving a Material Financial Interest and Conflict of Interest.....	15
Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest	15
Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest .....	16
Item 12: Brokerage Practices .....	16
Factors Used to Select Broker-Dealers for Client Transactions.....	16
Aggregating Securities Transactions for Client Accounts .....	17
Item 13: Review of Accounts.....	17
Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons Involved .....	17
Review of Client Accounts on Non-Periodic Basis .....	17
Content of Client Provided Reports and Frequency.....	17
Item 14: Client Referrals and Other Compensation .....	17
Economic Benefits Provided to the Advisory Firm from External Sources and Conflicts of Interest .....	17
Advisory Firm Payments for Client Referrals.....	17
Item 15: Custody .....	18
Account Statements.....	18
Item 16: Investment Discretion .....	18
Discretionary Authority for Trading .....	18
Item 17: Voting Client Securities .....	19
Proxy Votes .....	19
Item 18: Financial Information .....	19
Balance Sheet.....	19
Financial Conditions Reasonably Likely to Impair Advisory Firm’s Ability to Meet Commitments to Clients .....	19
Bankruptcy Petitions during the Past Ten Years .....	19
Item 19: Requirements for State Registered Advisors .....	19
Principal Executive Officers and Management Persons .....	19
Outside Business Activities .....	19
Performance-Based Fee Description.....	20
Disclosure of Material Facts Related to Arbitration or Disciplinary Actions Involving Management Persons .....	20
Material Relationship Maintained by this Advisory Business or Management persons with Issuers of Securities .....	20
Brochure Supplement: Supervised Persons Brochure .....	20
Principal Executive Officer: Caitlyn Driehorst.....	20

## Item 4: Advisory Business

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### Firm Description

RightWise Wealth, Inc., ("RightWise") was founded in 2022. Caitlyn Driehorst is the 100% owner.

### Types of Advisory Services

#### Financial Planning

Financial planning services include a comprehensive evaluation of an investor's current and future financial state and will be provided by using currently known variables to predict future cash flows, asset values and withdrawal plans. RightWise will use current net worth, tax liabilities, asset allocation, and future retirement and estate plans in developing financial plans.

RightWise's financial planning process consists of three elements:

1. Structured planning: We have a series of standard meetings on common topics applicable to our client base of young accumulators. In our proposal process, we outline which meetings we believe are applicable to Client's circumstances. These meetings include:
  - a. Net Worth Meeting: Commonly part of our proposal process, we sync account data with our financial planning software to walk through accounts and identify planning opportunities, and to deliver a picture of Client household net worth
  - b. Tax Meeting: We analyze Client's prior year tax return to explain what they paid and why, and to suggest opportunities for the coming year
  - c. Cash Flow Meeting: We categorize transactions from three months of representative spending to identify savings opportunities and to determine current monthly spending and savings averages
  - d. Student Loan Meeting: We summarize Client's student loans and recommend payment, forgiveness and refinancing strategies, as appropriate
  - e. Retirement Meeting: We walk through a dynamic projection of factors affecting a Client's path to retirement
  - f. Insurance Meeting: We review the Client's current insurance coverage across life, property, disability and others as applicable to educate the client as to their insurance needs and potential changes to their current coverage
  - g. End-of-Life Organization: We educate Client as to the documents and structures they may care to implement to protect their interests and their loved ones at end-of-life
2. Ad hoc meeting: Outside of our standardized meetings, we work with Client on topics that help them reach their financial goals, such as ancillary investment accounts like HSAs and 529s; to create spreadsheets to answer specific questions; to help them implement our suggestions, as helpful; or to answer other questions about their finances, as helpful.

*Conflict of Interest:* The Client is under no obligation to act upon RightWise's recommendations. If the Client elects to act on any of the recommendations, the Client is under no obligation to effect any transaction through RightWise.

### Investment Management

RightWise offers discretionary asset management services to advisory Clients. RightWise will offer Clients ongoing asset management services through determining individual investment goals, time horizons, objectives, and risk tolerance. Investment strategies, investment selection, asset allocation, portfolio monitoring and the overall investment program will be based on the above factors. The Client will authorize RightWise discretionary authority to execute selected investment program transactions as stated within the Investment Advisory Agreement.

*Betterment Platform:* RightWise offers discretionary direct asset management services to advisory clients utilizing the Betterment for Advisors platform for digital services. On this platform, RightWise has the discretion to delegate the management of all or part of the Assets to one or more independent investment managers or independent investment management programs ("Independent Managers"). To the extent utilized, Independent Managers will have limited power-of-attorney and trading authority over those assets RightWise directs to them for management. RightWise will supervise the Independent Managers and monitor and review asset allocation and asset performance. RightWise may terminate or change Independent Managers when, in RightWise's sole discretion, RightWise believes such termination or changes is in your best interest.

### Client-Tailored Services and Client-Imposed Restrictions

The goals and objectives for each Client are documented in our Client files. Investment strategies are created that reflect the stated goals and objectives. Clients may impose restrictions on investing in certain securities or types of securities. Agreements may not be assigned without written Client consent.

### Wrap Fee Programs

RightWise does not sponsor any wrap fee programs.

RightWise places clients into wrap fee programs offered by Betterment. When participating in a wrap fee program provided by Betterment, Client will receive additional information from Betterment in the form of a Client Agreement. Betterment LLC will provide the wrap program with Betterment Securities as the custodian for the wrap program. RightWise will ensure that client has received the program brochure prior to engaging in this service. Betterment Securities will make available on the Website to Client any and all notices and other communications relating to the Account, including privacy notices, transaction confirmations, prospectuses, and, where required by applicable laws and regulations, any proxy materials, annual reports, notices of meetings and any other material furnished to Betterment Securities by issuers whose securities Client owns. Betterment Securities will also deliver to Client account statements, and other notices regarding

the Account or Services Such notices and other communications will be sent or forwarded to Client via electronic mail address Client has specified or by making them available on the Website.

#### Client Assets Under Management

RightWise currently reports \$1,191,686 in discretionary assets under management and no non-discretionary assets under management. Assets under management were calculated as of December 31, 2023.

## Item 5: Fees & Compensation

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### Method of Compensation

#### Financial Planning

RightWise charges a fixed fee based on complexity and unique Client needs for financial planning. Prior to the planning process the Client will be provided an estimated plan fee. Client may cancel within five (5) business days of signing Agreement with no obligation and without penalty. If the Client cancels after five (5) business days, any unearned fees will be refunded to the Client, or any unpaid earned fees will be due to RightWise. RightWise reserves the right to waive the fee should the Client implement the plan through RightWise.

#### FIXED FEES

Financial Planning Services are offered based on a flat fee between \$500 to \$7,000, implemented via an upfront charge of \$1,000 and the subsequent balance billed monthly over 11 months, in arrears.

Clients can choose to pay for financial planning via the following methods:

- Check, to be remitted by Client to RightWise
- Deducted from a non-qualified account managed by RightWise
- Electronic Payment via ACH, Debit Card, or Credit Card

In the case of electronic payment, fees will be paid via a third party payment processor in which the client will securely input payment information and pay the advisory fee through a secure portal. RightWise will not have continuous access to the Client's banking information.

#### Asset Management

RightWise offers discretionary direct asset management services to advisory Clients. RightWise may charge a total investment management fee of up to 1.50%.

The annual fee is negotiable or can be waived based upon certain criteria (e.g., standalone vs in combination with Financial Planning services, relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with Clients, etc.). Fees are billed monthly in arrears based on an average daily balance of the account for the previous month. The calculation for the average daily balance is based on the formula  $\text{Fee} = \text{Rate} * \text{Value Averaged Over Days in Period} / 365 * \text{Days in Period}$ .

For example (based on monthly billing period): the first step taken using the average- daily-balance calculation method would be to take the average of the values of the Client's account over the



course of the entire month. Based on the formula  $\text{Fee} = \text{Rate} * \text{Value Averaged Over Days in Period} / 365 * \text{Days in Period}$ , the example would be:  $((.015 \times 1,000,000) / 365) * 31 = \$1,273.97$ .

*Betterment Investment Platform:* When utilizing the Betterment Investment platform, Betterment fees will be included in the fee schedule disclosed above. Client will not be charged additional fees for this service.

Lower fees for comparable services may be available from other sources. Clients may terminate their account within five (5) business days of signing the Investment Advisory Agreement with no obligation and without penalty. After the initial five (5) business days, the agreement may be terminated by RightWise with thirty (30) days written notice to Client and by the Client at any time with written notice to RightWise. For accounts opened or closed mid-billing period, fees will be prorated based on the days services are provided during the given period. All unpaid earned fees will be due to RightWise. Client shall be given thirty (30) days prior written notice of any increase in fees. Any increase in fees will be acknowledged in writing by both parties before any increase in said fees occurs.

#### Client Payment of Fees

Fees for asset management services are deducted from a designated Client account. The Client must consent in advance to direct debiting of their investment account.

Fees for financial plans will be completed by Electronic Payment via ACH, Debit Card, or Credit Card. Fees will be paid via a third-party payment processor in which the client will securely input payment information and pay the advisory fee through a secure portal. RightWise will not have continuous access to the Client's banking information.

#### Additional Client Fees Charged

Custodians may charge transaction fees and other related costs on the purchases or sales of mutual funds, equities, bonds, options and exchange-traded funds. Mutual funds, money market funds and exchange-traded funds also charge internal management fees, which are disclosed in the fund's prospectus. RightWise does not receive any compensation from these fees. All of these fees are in addition to the management fee you pay to RightWise. For more details on the brokerage practices, see Item 12 of this brochure.

#### Prepayment of Client Fees

RightWise does not require any prepayment of fees of more than \$500 per Client and six months or more in advance.

Fees for financial plans may be due, in full, at the commencement of the contract.

If the Client cancels after five (5) business days, any unearned fees will be refunded to the Client, or any unpaid earned fees will be due to RightWise.

#### External Compensation for the Sale of Securities to Clients

RightWise does not receive any external compensation for the sale of securities to Clients, nor do any of the investment advisor representatives of RightWise.

### Item 6: Performance-Based Fees and Side-by-Side Management

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#### Sharing of Capital Gains

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

RightWise does not use a performance-based fee structure because of the conflict of interest. Performance based compensation may create an incentive for RightWise to recommend an investment that may carry a higher degree of risk to the Client.

### Item 7: Types of Clients

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#### Description

RightWise generally provides investment advice to individuals and high net worth individuals. Client relationships vary in scope and length of service.

#### Account Minimums

RightWise does not require a minimum balance to open an account.

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

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### Methods of Analysis

Security analysis methods may include Modern Portfolio Theory. Investing in securities involves risk of loss that Clients should be prepared to bear. Past performance is not a guarantee of future returns.

Modern Portfolio Theory is the theory of finance that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, by carefully choosing the proportions of various assets.

### Investment Strategy

The investment strategy for a specific Client is based upon the objectives stated by the Client during consultations. The Client may change these objectives at any time by providing written notice to RightWise. Each Client executes a Client profile form or similar form that documents their objectives and their desired investment strategy.

Other strategies may include long-term purchases, short-term purchases, and trading.

### Security-Specific Material Risks

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks and should discuss these risks with RightWise:

- *Market Risk*: The prices of securities in which clients invest may decline in response to certain events taking place around the world, including those directly involving the companies whose securities are owned by a fund; conditions affecting the general economy; overall market changes; local, regional or global political, social or economic instability; and currency, interest rate and commodity price fluctuations. Investors should have a long-term perspective and be able to tolerate potentially sharp declines in market value.
- *Interest-rate Risk*: Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- *Inflation Risk*: When any type of inflation is present, a dollar today will buy more than a dollar next year, because purchasing power is eroding at the rate of inflation.
- *Currency Risk*: Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.

- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Management Risk:** The advisor's investment approach may fail to produce the intended results. If the advisor's assumptions regarding the performance of a specific asset class or fund are not realized in the expected time frame, the overall performance of the client's portfolio may suffer.
- **Equity Risk:** Equity securities tend to be more volatile than other investment choices. The value of an individual mutual fund or ETF can be more volatile than the market as a whole. This volatility affects the value of the client's overall portfolio. Small- and mid- cap companies are subject to additional risks. Smaller companies may experience greater volatility, higher failure rates, more limited markets, product lines, financial resources, and less management experience than larger companies. Smaller companies may also have a lower trading volume, which may disproportionately affect their market price, tending to make them fall more in response to selling pressure than is the case with larger companies.
- **Fixed Income Risk:** The issuer of a fixed income security may not be able to make interest and principal payments when due. Generally, the lower the credit rating of a security, the greater the risk that the issuer will default on its obligation. If a rating agency gives a debt security a lower rating, the value of the debt security will decline because investors will demand a higher rate of return. As nominal interest rates rise, the value of fixed income securities held by a fund is likely to decrease. A nominal interest rate is the sum of a real interest rate and an expected inflation rate.
- **Investment Companies Risk:** When a client invests in open end mutual funds or ETFs, the client indirectly bears their proportionate share of any fees and expenses payable directly by those funds. Therefore, the client will incur higher expenses, which may be duplicative. In addition, the client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives). ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value or (ii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. Adviser has no control over the risks taken by the underlying funds in which the client invests.
- **Foreign Securities Risk:** Funds in which clients invest may invest in foreign securities. Foreign securities are subject to additional risks not typically associated with investments in domestic securities. These risks may include, among others, currency risk, country risks (political, diplomatic, regional conflicts, terrorism, war, social and economic instability, currency devaluations and policies that have the effect of limiting or restricting foreign investment or the movement of assets), different trading practices, less government

supervision, less publicly available information, limited trading markets and greater volatility. To the extent that underlying funds invest in issuers located in emerging markets, the risk may be heightened by political changes, changes in taxation, or currency controls that could adversely affect the values of these investments. Emerging markets have been more volatile than the markets of developed countries with more mature economies.

- *Long-term purchases:* Long-term investments are those vehicles purchased with the intention of being held for more than one year. Typically the expectation of the investment is to increase in value so that it can eventually be sold for a profit. In addition, there may be an expectation for the investment to provide income. One of the biggest risks associated with long-term investments is volatility, the fluctuations in the financial markets that can cause investments to lose value.
- *Short-term purchases:* Short-term investments are typically held for one year or less. Generally there is not a high expectation for a return or an increase in value. Typically, short-term investments are purchased for the relatively greater degree of principal protection they are designed to provide. Short-term investment vehicles may be subject to purchasing power risk — the risk that your investment’s return will not keep up with inflation.
- *Trading risk:* Investing involves risk, including possible loss of principal. There is no assurance that the investment objective of any fund or investment will be achieved.

## Item 9: Disciplinary Information

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### Criminal or Civil Actions

RightWise and its management have not been involved in any criminal or civil action.

### Administrative Enforcement Proceedings

RightWise and its management have not been involved in administrative enforcement proceedings.

### Self-Regulatory Organization Enforcement Proceedings

RightWise and its management have not been involved in any self-regulatory organizational enforcement proceedings that are material to a Client's or prospective Client's evaluation of RightWise or the integrity of its management.

## Item 10: Other Financial Industry Activities and Affiliations

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### Broker-Dealer or Representative Registration

RightWise is not registered as a broker-dealer and no affiliated representatives of RightWise are registered representatives of a broker-dealer.

### Futures or Commodity Registration

Neither RightWise nor its affiliated representatives are registered or have an application pending to register as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

### Material Relationships Maintained by this Advisory Business and Conflicts of Interest

RightWise does not maintain any material relationships and therefore there are no conflicts of interest.

### Recommendations or Selections of Other Investment Advisors and Conflicts of Interest

RightWise does not select or recommend other investment advisors.

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

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### Code of Ethics Description

The a ■ liated persons (a ■ liated persons include employees and/or independent contractors) of RightWise have committed to a Code of Ethics ("Code"). The purpose of our Code is to set forth standards of conduct expected of RightWise a ■ liated persons and addresses conflicts that may arise. The Code defines acceptable behavior for a ■ liated persons of RightWise. The Code reflects RightWise and its supervised persons' responsibility to act in the best interest of their Client. One area which the Code addresses is when a ■ liated persons buy or sell securities for their personal accounts and how to mitigate any conflict of interest with our Clients. We do not allow any a ■ liated persons to use non-public material information for their personal profit or to use internal research for their personal benefit in conflict with the benefit to our Clients. RightWise's policy prohibits any person from acting upon or otherwise misusing non- public or inside information. No advisory representative or other a ■ liated person, o ■ cer or director of RightWise may recommend any transaction in a security or its derivative to advisory Clients or engage in personal securities transactions for a security or its derivatives if the advisory representative possesses material, non-public information regarding the security. RightWise's Code is based on the guiding principle that the interests of the Client are our top priority. RightWise's o ■ cers, directors, advisors, and other a ■ liated persons have a fiduciary duty to our Clients and must diligently perform that duty to maintain the complete trust and confidence of our Clients. When a conflict arises, it is our obligation to put the Client's interests over the interests of either a ■ liated persons or the company. The Code applies to "access" persons. "Access" persons are a ■ liated persons who have access to non-public information regarding any Clients' purchase or sale of securities, or non-public information regarding the portfolio holdings of any reportable fund, who are involved in making securities recommendations to Clients, or who have access to such recommendations that are non-public. RightWise will provide a copy of the Code of Ethics to any Client or prospective Client upon request.

### Investment Recommendations Involving a Material Financial Interest and Conflict of Interest

RightWise and its a ■ liated persons do not recommend to Clients securities in which we have a material financial interest.

### Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest

RightWise and its a ■ liated persons may buy or sell securities that are also held by Clients. In order to mitigate conflicts of interest such as trading ahead of Client transactions, a ■ liated persons are required to disclose all reportable securities transactions as well as provide RightWise with copies of their brokerage statements. The Chief Compliance o ■ cer of RightWise is Caitlyn Driehorst. She

reviews all trades of the a  liated persons each quarter. The personal trading reviews ensure that the personal trading of a  liated persons does not affect the markets and that Clients of the firm receive preferential treatment over associated persons' transactions.

#### Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest

RightWise does not have a material financial interest in any securities being recommended. However, a  liated persons may buy or sell securities at the same time they buy or sell securities for Clients. In order to mitigate conflicts of interest such as front running, a  liated persons are required to disclose all reportable securities transactions as well as provide RightWise with copies of their brokerage statements. The Chief Compliance Officer of RightWise is Caitlyn Driehorst. She reviews all trades of the a  liated persons each quarter. The personal trading reviews ensure that the personal trading of a  liated persons does not affect the markets and that Clients of the firm receive preferential treatment over associated persons' transactions.



## Item 12: Brokerage Practices

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### Factors Used to Select Broker-Dealers for Client Transactions

RightWise will recommend the use of a particular broker-dealer based on their duty to seek best execution for the client, meaning they have an obligation to obtain the most favorable terms for a client under the circumstances. The determination of what may constitute best execution and price in the execution of a securities transaction by a broker involves a number of considerations and is subjective. Factors affecting brokerage selection include the overall direct net economic result to the portfolios, the efficiency with which the transaction is affected, the ability to effect the transaction where a large block is involved, the operational facilities of the broker-dealer, the value of an ongoing relationship with such broker and the financial strength and stability of the broker. RightWise will select appropriate brokers based on a number of factors including but not limited to their relatively low transaction fees and reporting ability. RightWise relies on its broker to provide its execution services at the best prices available. Lower fees for comparable services may be available from other sources. Clients pay for any and all custodial fees in addition to the advisory fee charged by RightWise. RightWise does not receive any portion of the trading fees.

RightWise will require the use of Betterment for Advisors for its asset management services.

### *Research and Other Soft Dollar Benefits*

RightWise does not have any soft dollar benefit arrangements in place.

### Brokerage for Client Referrals

RightWise does not receive client referrals from any custodian or third party in exchange for using that broker-dealer or third party.

### *Directed Brokerage*

RightWise does not allow directed brokerage accounts.

### Aggregating Securities Transactions for Client Accounts

RightWise manages each account separately, and therefore, does not aggregate purchases and sales and other transactions. If orders are not aggregated, some clients purchasing securities around the same time may receive a less favorable price than other clients which may cost clients more money.

## Item 13: Review of Accounts

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### Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons Involved

Account reviews are performed quarterly by the Chief Compliance Officer of RightWise, Caitlyn Driehorst. Account reviews are performed more frequently when market conditions dictate. Reviews of Client accounts include, but are not limited to, a review of Client documented risk tolerance, adherence to account objectives, investment time horizon, and suitability criteria.

### Review of Client Accounts on Non-Periodic Basis

Other conditions that may trigger a review of Clients' accounts are changes in the tax laws, new investment information, and changes in a Client's own situation.

### Content of Client Provided Reports and Frequency

Clients receive written account statements no less than quarterly for managed accounts. Account statements are issued by RightWise's custodian. Client receives confirmations of each transaction in account from custodian and an additional statement during any month in which a transaction occurs. RightWise does not provide additional reports to Clients.

## Item 14: Client Referrals and Other Compensation

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**Economic Benefits Provided to the Advisory Firm from External Sources and Conflicts of Interest**  
RightWise does not receive any economic benefits from external sources.

**Advisory Firm Payments for Client Referrals**  
RightWise does not compensate for Client referrals.

## Item 15: Custody

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### Account Statements

All assets are held at qualified custodians, which means the custodians provide account statements directly to Clients at their address of record at least quarterly. Clients are urged to carefully compare the account statements received directly from their custodians to any documentation or reports prepared by RightWise.

RightWise is deemed to have limited custody solely because advisory fees are directly deducted from Client's accounts by the custodian on behalf of RightWise.

If RightWise is authorized or permitted to deduct fees directly from the account by the custodian:

- RightWise will provide the Client with an invoice concurrent to instructing the custodian to deduct the fee stating the amount of the fee, the formula used to calculate the fee, the amount of assets under management the fee is based on and the time period covered by the fee;
- RightWise will obtain written authorization signed by the Client allowing the fees to be deducted; and
- The Client will receive quarterly statements directly from the custodian which disclose the fees deducted.

## Item 16: Investment Discretion

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### Discretionary Authority for Trading

RightWise requires discretionary authority to manage securities accounts on behalf of Clients. RightWise has the authority to determine, without obtaining specific Client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. The client will authorize RightWise discretionary authority stated within the Investment Advisory Agreement. RightWise allows Clients to place certain restrictions, as outlined in the Client's Investment Policy Statement or similar document. These restrictions must be provided to RightWise in writing. The Client approves the custodian to be used and the commission rates paid to the custodian. RightWise does not receive any portion of the transaction fees or commissions paid by the Client to the custodian.

## Item 17: Voting Client Securities

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### Proxy Votes

RightWise does not vote proxies on securities. Clients are expected to vote their own proxies. The Client will receive their proxies directly from the custodian of their account or from a transfer agent. When assistance on voting proxies is requested, RightWise will provide recommendations to the Client. If a conflict of interest exists, it will be disclosed to the Client. If the Client requires assistance or has questions, they can reach out to the investment advisor representatives of the firm at the contact information on the cover page of this document.

## Item 18: Financial Information

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### Balance Sheet

A balance sheet is not required to be provided to Clients because RightWise does not serve as a custodian for Client funds or securities and RightWise does not require prepayment of fees of more than \$500 per Client and six months or more in advance.

### Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients

RightWise has no condition that is reasonably likely to impair our ability to meet contractual commitments to our Clients.

### Bankruptcy Petitions during the Past Ten Years

RightWise has not had any bankruptcy petitions in the last ten years.

## Item 19: Requirements for State Registered Advisors

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### Principal Executive Officers and Management Persons

The education and business background for all management and supervised persons can be found in the Part 2B of this Brochure.

### Outside Business Activities

The outside business activities for all Investment Adviser Representatives can be found in the Part 2B of this Brochure.

### Performance-Based Fee Description

Neither RightWise nor its management receive performance-based fees. Please see Item 6 of the ADV 2A for more information.

### Disclosure of Material Facts Related to Arbitration or Disciplinary Actions Involving Management Persons

Neither RightWise nor its management have been involved in any of the following:

1. An award or otherwise been found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
  - a. An investment or an investment-related business or activity;
  - b. Fraud, false statement(s) or omissions;
  - c. Theft, embezzlement or other wrongful taking of property;
  - d. Bribery, forgery, counterfeiting, or extortion;
  - e. Dishonest, unfair or unethical practices.
2. An award or otherwise been found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
  - a. An investment or an investment-related business or activity;
  - b. Fraud, false statement(s) or omissions;
  - c. Theft, embezzlement or other wrongful taking of property;
  - d. Bribery, forgery, counterfeiting, or extortion; e. Dishonest, unfair or unethical practices.

### Material Relationship Maintained by this Advisory Business or Management persons with Issuers of Securities

There are no material relationships with issuers of securities to disclose.

## Brochure Supplement: Supervised Persons Brochure

Principal Executive Officer: Caitlyn Driehorst

### *Item 1: Year of Birth*

Ms. Driehorst was born in Las Vegas, NV, in 1989

### *Item 2: Educational Background and Business Experience*

#### Educational Background:

- The University of Chicago, The College of Arts & Sciences; Bachelor of Arts in Slavic Languages and Literature; Bachelor of Arts in English Language and Literature; 2011
- The University of California, Berkeley, Haas Graduate School of Business; Masters in Business Administration; 2018

#### Business Experience:

- RightWise Wealth; Investment Advisor Representative; 12/2022-Present
- RightWise Wealth; President; 09/2022-Present
- Signal Advisors; General Manager; 10/2021-08/2022
- OpenInvest; Director of Product Strategy; 11/2020-09/2021
- Capital Group; Strategy & Innovation Associate; 07/2018-10/2020
- Full-time student; 08/2017-06/2018
- Capital Group; MBA Intern; 05/2017-07/2017
- Full-time student; 08/2016-04/2017
- Accion Venture Lab; Portfolio Engagement Fellow; 01/2016-06/2016
- MGM Resorts International; Strategy Manager; 10/2013-12/2015
- LeapFrog Investments; Chief of Staff to CEO; 08/2013-09/2013
- Boston Consulting Group; Associate; 06/2011-07/2013

### *Item 3: Disciplinary Information*

Ms. Driehorst has never been involved in a criminal or civil action in a domestic, foreign or military court of competent jurisdiction for which she:

1. Was convicted of, or pled guilty or nolo contendere ("no contest") to (a) any felony; (b) misdemeanor that involved investments or an investment-related business, fraud, false statement or omissions, wrongful taking of property, bribery, perjury, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses;
2. Is the named subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses;
3. Was found to have been involved in a violation of an investment-related statute or regulation; or

4. Was the subject of any order, judgment or decree permanently or temporarily enjoining, or otherwise limiting, her from engaging in any investment related activity, or from violating any investment-related statute, rule, or order.

Ms. Driehorst never had an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which she:

1. Was found to have caused an investment-related business to lose its authorization to do business; or the subject of an order by the agency or authority;
2. Was found to have been involved in a violation of an investment-related statute or regulation or was the subject of an order by the agency or authority (a) denying, suspending or revoking the authorization of the supervised person to act in an investment-related business; (b) barring or suspending his association with an investment-related business; (c) otherwise significantly limiting his investment-related activities; or (d) imposing a civil money penalty of more than \$2,500 on her.

Ms. Driehorst has never been the subject of a self-regulatory organization (SRO) proceeding in which she:

1. Was found to have caused an investment-related business to lose its authorization to do business; or
2. Was found to have been involved in a violation of the SRO's rules and was: (a) barred or suspended from membership or from association with other members, or was expelled from membership; (b) otherwise significantly limited from investment-related activities; or (c) fined more than \$2,500.

Ms. Driehorst has not been involved in any other hearing or formal adjudication in which a professional attainment, designation, or license of the supervised person was revoked or suspended because of a violation of rules relating to professional conduct.

*Item 4: Other Business Activities*

Ms. Driehorst does not engage in any outside business activities.

*Item 5: Additional Compensation*

Ms. Driehorst does not receive any performance-based fees and does not receive any additional compensation for performing advisory services other than what is disclosed in Item 5 of Part 2A.

*Item 6: Supervision*

Since Ms. Driehorst is the sole owner and investment adviser representative of RightWise and is solely responsible for all supervision and formulation and monitoring of investment advice offered to Clients. She will adhere to the policies and procedures as described in the firm's Compliance Manual. She can be reached at [caitlyn@rightwisewealth.com](mailto:caitlyn@rightwisewealth.com) or 702- 986-0868.

*Item 7: Requirements for State-Registered Advisors*

Ms. Driehorst has not been involved in any of the following:

1. An award or otherwise been found liable in an arbitration claim alleging damages in excess of \$2,500 involving any of the following:
  - a. An investment or an investment-related business or activity;
  - b. Fraud, false statement(s) or omissions;
  - c. Theft, embezzlement or other wrongful taking of property;
  - d. Bribery, forgery, counterfeiting, or extortion;
  - e. Dishonest, unfair or unethical practices.
2. An award or otherwise been found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
  - a. An investment or an investment-related business or activity;
  - b. Fraud, false statement(s) or omissions;
  - c. Theft, embezzlement or other wrongful taking of property;
  - d. Bribery, forgery, counterfeiting, or extortion;
  - e. Dishonest, unfair or unethical practices.
3. Ms. Driehorst has never been the subject of a bankruptcy petition.