



WorthNet, LLC

(CRD # 333488)

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Form ADV Part 2A - Firm Brochure

January 29, 2026

This brochure provides information about the qualifications and business practices of **WorthNet, LLC**. If you have questions about the contents of this brochure, please contact us at (667) 312-3548. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or any state securities authority. Nothing in this document is to be construed as a recommendation or an endorsement by the SEC or any state securities authority. Registration as an investment adviser does not imply a certain level of skill or training.

Additional information about **WorthNet, LLC**, is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2: Summary of Material Changes

WorthNet, LLC ("WorthNet") is a state-registered investment adviser organized as a limited liability company and located at 16 W. Madison Street in Baltimore, Maryland. We commenced our Promoter referral advisory business on June 9, 2025, following the successful investment adviser registration application by the Maryland Securities Division.

We submitted our first annual updating amendment on January 29, 2026. The following material changes were effected:

- Item 5 and Item 11 was amended to remove language about our firm providing a Code of Ethics upon request.
- Item 10 was amended to disclose the name of our firm's CCO.
- Item 10 was also amended to clarify direct and indirect compensation from affiliates.
- Item 20 was amended to remove language about our firm's business continuity plan.

Clients are encouraged to review the entire Brochure carefully and contact our firm with any questions regarding the above updates or our services.

Full Brochure Availability

We may amend this document at any time to reflect material changes in our business practices, policies, or procedures, as required by securities regulators. Annually, within 120 days of the close of our fiscal year on December 31, and as needed for any material changes, we will provide clients - either electronically or in hard copy- with a new brochure or a summary of material changes from the previously supplied document, along with an offer to deliver the full brochure upon request. Please retain this document for future reference, as it contains essential information about our advisory services and business.

You may view our current disclosure documents at the SEC's Investment Adviser Public Disclosure ("IAPD") website at <http://www.adviserinfo.sec.gov> by searching either by our firm name, **WorthNet, LLC** or CRD # 333488. The SEC's website also provides information about any affiliated person registered or required to be registered as an Investment Adviser Representative of the firm. You may also request a copy free of charge by contacting us directly at (667) 312-3548 or by email at compliance@worthnet.com.

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Item 4: Advisory Business

Description of Firm

WorthNet, LLC ("WorthNet") is a state-registered investment adviser located at 16 W. Madison Street, Baltimore, MD. Organized as a limited liability company under Maryland law, we commenced our Promoter referral advisory business on June 9, 2025, following the approval of our investment adviser registration application, which was submitted in Maryland and multiple other states.

Principal Owners

WorthNet is principally owned by Monument and Cathedral Holdings, LLC and indirectly owned by Cobblestone Publishing, Inc. and Elizabeth W. P. Bonner Electing Small Business Trust. Monument and Cathedral Holdings, LLC, and Cobblestone Publishing, Inc. are holding companies with numerous subsidiaries across a diverse range of businesses, including publishing companies focused on personal finance and investing.

The following paragraphs describe our business practices, services and fees. As used in this brochure, the words "we," "our," and "us" refer to WorthNet, and the words "you," "your," and "client" refer to you, whether as a referral client or a prospective referral client of our firm.

WorthNet acts as a fiduciary to clients, as defined by applicable laws and regulations. In this role, we are committed to upholding a duty of loyalty, fairness, and good faith toward each client while actively working to mitigate potential conflicts of interest. In providing our services, we strive to exercise the care, skill, prudence, and diligence that a prudent person would employ in a fiduciary capacity.

Non-Exclusive Relationship

WorthNet's relationship with each client is non-exclusive; we serve multiple clients and may refer different third-party, unaffiliated registered investment advisers ("RIAs") based on each client's unique financial situation. As a result, the referrals provided to one client may differ or even conflict with those offered to another.

Other Professional Service Provider Recommendations

WorthNet may recommend the services of other professionals, such as lawyers, accountants, or insurance agents, for implementation purposes. These professionals will be engaged directly by the client on an as-needed basis, and our firm will receive compensation for such referrals, which will be disclosed in a separate statement provided to the client before engagement. These recommendations create a conflict of interest, as our firm has a financial incentive to refer clients to particular professionals.

Clients are not obligated to utilize any recommended services and may choose to accept or reject any recommendations at their discretion. If clients decide to engage a recommended professional, they will enter into a separate agreement with that professional, who retains the right to accept or decline the client for any reason. Clients are responsible for understanding the terms of any agreement with the referred provider, including associated fees and charges. WorthNet is not a party to these transactions and contracts and has no authority to act on behalf of any referred professional. *(Note: If a client engages any recommended professional, and a dispute arises thereafter relative to such engagement, the client agrees to seek recourse exclusively from the committed professional, not from WorthNet. Federal and state securities laws impose liabilities on persons who act in good faith under certain circumstances. Therefore, nothing in an Advisory Agreement shall in any way constitute a waiver or limitation of any rights that the client may have under federal and state securities laws.)*

Types of Advisory Services

Through its online platform and website (www.worthnet.com) and in its capacity as a Promoter, WorthNet's primary advisory function is facilitating referrals and connecting prospective clients ("Users") with one or more unaffiliated, independent registered investment advisers ("RIAs") with whom the firm has established strategic relationships (referred to as our "Partner Advisers"). These RIAs have been carefully curated and thoughtfully selected through a rigorous due diligence process. Those who meet our criteria are invited to participate in our web-based matching program (the "Service"), and each has agreed to join based on shared values and commitments to high standards. All participating advisers are duly registered with a recognized U.S. regulatory authority.

WorthNet's interactive online platform uses a proprietary, rules-based algorithm to match Users with Partner Advisers. Users

complete an Investor Questionnaire that captures information such as investment objectives, risk tolerance, and other relevant financial and personal data. The algorithm analyzes the inputs and compares them to the profiles of participating Partner Advisers to identify the most appropriate match based on the provided specifics.

If a suitable match is found, the User is referred to one or more Partner Advisers who align with their expressed goals. These referrals are made based on the belief that the User may benefit from the services offered by the matched advisory firm(s). Users also have the option to bypass the algorithm and select a Partner Adviser directly from the list of participating firms, provided they meet the platform's suitability requirements and those of the chosen Adviser. Users who do not meet the eligibility criteria or who are otherwise deemed ineligible will be notified that, at this time, they cannot be matched with an adviser through the Service.

WorthNet does not provide investment advice, make securities recommendations, or influence the outcome of the matching process. The algorithm's recommendations and any User-directed selections are based solely on objective criteria and the information provided by the User. WorthNet does not participate in or influence the ongoing advisory relationship between the User and the Partner Adviser. Once a referral is made, the Partner Adviser is solely responsible for determining whether to accept the User as a client and for managing the advisory relationship thereafter. WorthNet is responsible for:

- clearly disclosing the nature of the referral relationship to the User,
- obtaining the User's informed consent to participate in the referral process, and
- transmitting the relevant information to the selected Partner Adviser to support a compliant and informed onboarding process.

If desired, Users may contact us with questions about the Service or to inquire about the referred advisers available on our platform. Our role in such instances is to help the User fully understand the scope of our advisory services and our part as a Promoter. We will provide information about the participating RIAs and assist the User in connecting with one or more of our Partner Advisers. If a User contacts WorthNet directly, they will be connected with an appropriately licensed and registered Investment Adviser Representative ("IAR"), who will explain the advisory services offered through the platform, help them understand the available options, and support them in obtaining the information necessary to conduct thorough and informed due diligence. This enables the User to determine the advisory relationship that may best suit their individual needs. In addition to this due diligence, referred clients are encouraged to consult with their own tax professionals, financial experts, legal counsel, or other trusted advisors to support their decision-making process.

Before entering any Promoter agreement with or introducing clients to a referred RIA, WorthNet conducts thorough due diligence on the RIAs invited to participate on its platform to confirm that the RIAs are appropriately registered or notice-filed in the client's state of residence, qualified to provide investment advice, and in good standing with relevant regulatory authorities. Where state law requires licensure for Promoters, we will monitor that no fees are paid unless the service provider is registered as an IAR of our firm. If we intend to pay Promoter fees to other RIAs, the licensure of individuals remains the responsibility of those firms.

All referral arrangements are governed by a written agreement between WorthNet and the RIAs we represent. These contracts outline the terms and our compensation structure, which is based on a percentage of the advisory fees received from Users who become referred clients of the Partner Adviser. Our compensation and all written disclosures regarding these fees must comply with applicable federal and state regulations.

The referred RIA is responsible for providing the referred Users who may become clients with all required written disclosures, including:

- a copy of their Form ADV Part 2 and other relevant brochures,
- a "Solicitation Disclosure Statement" detailing the fees we receive (our compensation for the referral),
- notification of whether we are a client or non-client of the RIA,
- the nature of our relationship and any material conflicts of interest arising from the relationship or compensation arrangement,
- all material terms of the arrangement, and
- a copy of their Privacy Policy.

Further, the referred Partner Advisers must disclose any material conflicts of interest that could compromise their ability to

provide unbiased and objective advice. This disclosure aims to ensure that Users can make informed decisions and fully understand the advisory relationship in compliance with applicable regulations before deciding to become clients of the referred RIAs.

Our firm will also provide a copy of this written disclosure and email a copy to Users after form submission.

Users will sign an acknowledgment confirming their receipt of copies of all material operative documentation and disclosures detailing the nature of the relationship, compensation to us, and other general terms of the referred RIA.

Client Engagement Process

WorthNet's online questionnaire is designed to collect personal and financial information to make a reasonable inquiry into the User's financial circumstances, level of financial sophistication, investment experience, and financial objectives—collectively referred to as the User's "Investment Profile." This process aims to establish a well-informed understanding of the User's financial situation to support appropriate adviser matching.

The questionnaire seeks to gather, without limitation, the following information: current income, financial needs, existing investments, assets and liabilities, marital and tax status, age, investment time horizon, liquidity requirements, risk tolerance, investment experience, financial goals, and overall investment objectives. Additionally, Users are provided with an opportunity to submit any other relevant information or considerations they wish to disclose based on their unique circumstances.

Based on the responses provided, and if a suitable match is identified, Users will be presented with the contact details of one or more Partner Advisers whom the algorithm determines to be well-aligned with their stated investment needs. As previously noted, Users will receive detailed information about the referred Partner Adviser(s), enabling them to conduct their own due diligence. Users are encouraged to consult with their tax professionals, financial advisors, legal counsel, or other trusted experts to support their decision-making process. Additionally, Users retain the option to access WorthNet's full database of RIA Partner Advisers and may choose to engage with firms beyond those initially recommended through the matching Service's automated process.

Users who choose to engage with one of our Partner Advisers will enter into a separate Advisory Services Agreement directly with the selected RIA. This agreement, along with the User's Investment Profile, will define the specific terms of account management, including the scope of authority, responsibilities, and any agreed-upon limitations. The referred RIA is obligated to adhere to the terms outlined in the executed Advisory Services Agreement to ensure accurate account management, sound investment decisions, appropriate implementation, and fulfillment of fiduciary responsibilities.

Once the Advisory Services Agreement is in place and the User becomes a client of the referred RIA, it is the client's responsibility to promptly communicate any material changes in their financial circumstances, investment objectives, or other relevant information. Such updates are essential for the RIA to maintain an appropriate and effective investment strategy.

After a User becomes a client of the referred RIA, custody of their assets will be maintained separately by the referred RIA's independent Qualified Custodian. All cash, securities, and other assets within the client's account will be held in accordance with the agreement the client signs directly with the referred RIA's custodian. The referred RIA will review the client's accounts based on the client's stated investment objectives and guidelines, making adjustments according to the client's Investment Profile.

When selecting a referred RIA, it is essential that Users fully understand the fees and the Advisory Services Agreement they are entering into with the referred RIA manager. Before participating in any RIA program, Users are encouraged to carefully review all applicable disclosure brochures and the referred RIA's Advisory Services Agreement for complete details.

Limitations of Our Role

WorthNet is not authorized to accept clients on behalf of any referred RIAs, and those RIAs have no obligation to accept any Users we refer to them as prospective clients. Our online platform focuses on our Promoter advisory services and processes without providing specific investment advice or recommendations. We do not guide Users on investing, purchasing, or selling securities, nor do we conduct securities analysis or participate in individual account management.

WorthNet does not open accounts, accept cash or securities, or act as a portfolio manager. Our standard services do not include

monitoring conflicts of interest, client investments, daily trading activity, or operational issues related to outside portfolio managers. All investment advice is delivered exclusively by the referred RIAs, who are solely responsible for recommendations, analysis, financial planning, and the advisory services they provide.

As a Promoter, we recommend third-party Registered Investment Advisers to manage client assets and retain discretion over the selection, engagement, and termination of these advisers. All RIAs referred through our platform are subject to our internal standards for inclusion, which are periodically reviewed and updated.

Conflicts of Interest

WorthNet and its Supervised Persons have a conflict of interest when we, or our Supervised Persons, receive compensation for referring Users to certain third-party advisors. Users will receive the most recent relevant brochures or equivalent disclosure documents from the unaffiliated RIAs detailing the Partner Adviser's programs, the compensation we receive as a Promoter, the terms of the fee arrangements, and any material conflicts of interest arising from our relationship with the RIAs.

Types of Investments

WorthNet does not offer investment services or advice. The referred RIAs will provide all investment advice to investors who engage in their services.

Client-Tailored Services & Client-Imposed Restrictions

All advisory services, specific financial plans (as applicable), client-tailored services, and their implementation— including any User-imposed restrictions —depend on the arrangements between the referred User and their selected RIA, as outlined in the agreement(s) they will execute with the referred party. Typically, these contracts include an Advisory Services Agreement and a User Suitability Investment Profile, which details each User's financial situation, investment goals, risk tolerance, and fee structure, among other factors. These documents are essential for selecting a portfolio designed to meet each client's investment strategy. Users should refer to the RIA's Form ADV disclosure documents for additional information. WorthNet does not participate in creating, updating, or overseeing these documents.

Wrap Fee Programs

WorthNet does not participate in any wrap fee programs.

Assets Under Management

As a Promoter, WorthNet does not manage client accounts or assets, nor do we provide recommendations regarding specific securities or investment strategies. Consequently, we do not have assets under management ("AUM") to report or disclose

Item 5: Fees & Compensation

Promoter Referral Fee

WorthNet will receive a fee (the "Referral Fee") for introducing Users to independent third-party RIAs on our platform, who may subsequently decide to become clients of the matched RIA under a separately executed Advisory Agreement between them and the Partner Adviser they choose to engage. Users do not incur any fees charged by us. However, the Partner Advisers on our platform to whom we refer such potential clients will generally charge an advisory fee for their services should the matched User decide to engage the referred RIA for its services. Such advisory fees are not increased solely as a result of our Promoter Referral Fee. Referral Fee is not negotiable.

When introducing Users to matched Partner Advisers, the specific Referral Fee paid to us by the referral RIAs on our platform in recognition of our referral services will vary. WorthNet's fees will typically take the form of a percentage of the advisory fees collected by the referred RIA and will be ongoing. The Referral Fee will continue for the duration of the User's relationship with the referred RIA, provided the User's assets remain under management and the referred User continues to pay the referred RIA's advisory fees as a client of the RIA. However, in certain instances, a one-time fee will be applied.

WorthNet will receive a Referral Fee per User equal to the greater of (1) 30% of all Eligible Fees (herein, "Eligible Fees" means all fees collected by the referred adviser that are legally permissible to share with WorthNet as the Promoter, including both recurring and one-time fees, but excluding brokerage commissions and other pass-through fees) paid by prospective investors who become Users of the referred adviser or (2) 20 basis points (0.20%) of the first \$5 million value and 10 basis points (0.10%) of any value above that for all assets against which fees are charged from prospective investors who choose to become Users

of the referred Adviser. Our Referral Fee is based solely on the fees paid by the User to the referred adviser, and the RIA will not impose any additional fees on the User to cover this referral compensation. The Referral Fee also applies to any additional services purchased by our referred User from the RIA (e.g., consulting services).

WorthNet does not access User accounts or collect any fees. All Referral Fees will be paid quarterly in arrears and remitted directly to us by the referred adviser within 45 days of the User being billed for the RIA's services.

Clients are informed of the Referral Fees paid to us through this revenue-sharing arrangement in our Form ADV disclosure documents and the Fee Disclosure Statement provided and accepted when the relationship is initiated. Additional fee information is also outlined in the Form ADV documents of each referred RIA and the separate Advisory Agreement executed directly between the User and the RIA.

As WorthNet does not collect fees in advance for advisory services, there is no need for or mechanism to provide pro-rata fee refunds related to advance payments. Clients will not incur any additional charges in connection with our referral services, and they are not required to prepay fees to us for these services. Any potential refund of advisory fees will be governed by the terms of the User's Agreement with the referred RIA. Neither WorthNet nor any of our Supervised Persons accepts compensation for the sale of securities or other investment products in connection with the provision of our Promoter advisory services.

Additional Fees & Expenses

WorthNet's fees are built into the fees the User will pay the referred adviser. Clients will not pay us any additional fees for our services in conjunction with the referral.

Clients should be aware that they will likely incur additional fees from the referred RIA manager, in addition to the Partner Adviser's advisory fee, depending on the selected advisory service and the investments held with their referred RIA. Any additional account, product, transaction, or brokerage fees charged by the custodian when buying or selling securities are not included in the advisory fee of the referred RIA. These fees and charges are separate and distinct and remain the User's responsibility. Any questions regarding such fees should be directed to the referred RIA.

It is the User's responsibility to review the referred RIA's disclosure documents, those of their custodian, and all offering documents, prospectuses, and legal papers for any proposed investments to understand the total account costs and all applicable fees, commissions, and expenses. Before acting on an RIA's analysis, advice, or recommendations, Users should consult with their legal, tax, or investment professionals to conduct due diligence to determine the suitability of the investment under consideration.

Potential Conflicts of Interest

WorthNet and its Supervised Persons have a conflict of interest when we receive compensation for referring Users to the Partner Advisers on our platform through our Promoter matching Service. The conflict exists because we recommend the services of a third-party manager or asset allocator who has agreed to share a portion of its management fee with us as a result of our referral, as opposed to other managers who have not agreed to pay us compensation. The compensation paid to us from various third-party managers will vary; therefore, there is a conflict in recommending a manager who shares a larger portion of its advisory fees over another manager, as it can incentivize recommendations based on compensation to be received rather than User needs. While we strive to offer competitive rates, it's important to note that fees charged by other investment advisers for similar services may be lower than ours. To address these conflicts, we prioritize the interests of Users above those of WorthNet and its Associates. Our compliance policies, procedures, and Code of Ethics detail our approach to managing conflicts of interest.

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

Performance-based fees are fees that depend on a share of capital gains or capital appreciation of User assets. Side-by-side management refers to the practice of managing accounts that incur performance-based fees alongside those that do not, thereby allowing for a comparison of the performance of both types of accounts.

WorthNet acts solely as a Promoter for unaffiliated RIAs; we do not accept performance-based fees or engage in side-by-side management. Our fees are calculated as outlined in Section 5: *Fees & Compensation*.

Item 7: Types of Clients

Client Base

WorthNet typically refers individuals (both non-high and high net worth) to the unaffiliated RIAs on our platform, but may refer other types of Users if they are matched and suitable for our services.

Requirements for Opening or Maintaining an Account

WorthNet neither opens nor maintains client accounts; therefore, it does not impose a minimum account size. The unaffiliated RIAs to whom a User is referred as a prospective client may impose minimum account sizes or other requirements for participation in their advisory services.

Clients are encouraged to refer to the unaffiliated RIA's Form ADV Part 2A and other disclosure documents, as well as any Advisory Services Agreement they execute with a referred Partner Adviser, for information on applicable minimum account sizes, advisory services, fees, and practices.

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

Methods of Analysis & Investment Strategies

WorthNet does not open client accounts, recommend the purchase of individual securities, manage securities, cash balances, or other assets, nor advise on specific methods of analysis, investments, or investment strategies. Instead, we refer Users to unaffiliated RIAs via our online matching Service, who will offer a variety of investment approaches based on the Partner Adviser's own advisory services, methods of analysis, investment strategies, and fee structures. Referred Users are encouraged to review the disclosure documents provided by their unaffiliated RIA for additional details.

Tax Considerations

The strategies and investments of referred RIAs may have unique and significant tax implications. Regardless of account size or other factors, WorthNet strongly recommends that referred investors consult a tax professional regarding their investment decisions. Custodians and broker-dealers are required to report the cost basis of equities acquired in User accounts. The User should discuss with their tax advisors which accounting method suits their situation. If a tax advisor recommends a different accounting method, we advise the referred User to notify their referred RIA promptly and, if necessary, inform the account custodian of their chosen method. It is essential to make decisions regarding cost-basis accounting methods before trades settle, as changes cannot be made after settlement has occurred. Ultimately, tax considerations are the client's responsibility.

Risk of Loss

All investment programs carry inherent risks that are borne by the investor. The advice received is based on the expertise of the unaffiliated RIA manager providing the service and each User's stated investment objectives.

We strongly encourage Users who choose to become clients of a matched and referred RIA to promptly inform their investment manager of any changes in their financial situation, investment goals, or if they wish to impose any reasonable restrictions on their management services. WorthNet does not represent, warrant, or imply that any unaffiliated RIAs' services or analytical methods can predict future results, accurately identify market peaks or troughs, or protect a client's account from losses due to market corrections or declines. All trading in securities—whether in stocks, options, or other investment vehicles—carries a speculative nature and involves a substantial risk of loss that the investor should be prepared to accept. Past performance is not necessarily indicative of future results. Further, investment products are generally not FDIC-insured or guaranteed by any federal government agency or our firm. Investors must understand the risks associated with their investments. Referred Users should review the matched RIA's Form ADV Part 2A disclosure brochure for additional common and specific marketplace risks that may impact portfolios.

Item 9: Disciplinary Information

Investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to a User's evaluation of an adviser or its management's integrity. Neither WorthNet nor any Associated Persons has legal or disciplinary events presumed to be material to disclose for this item. WorthNet encourages you to perform your due diligence on the topic. Visit www.investor.gov for a free and simple search tool to research our firm and financial professionals.

Item 10: Other Financial Industry Activities & Affiliations

Other Business Activities

WorthNet is an independent investment advisory firm that provides Promoter referral services as described in this ADV 2A brochure. We do not have a referral relationship or arrangement with any of the following entity types other than those described herein:

1. broker-dealer, municipal securities dealer, or government securities dealer or broker,
2. 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,
3. futures commission merchant, commodity pool operator, or commodity trading adviser,
4. accountant or accounting firm,
5. lawyer or law firm,
6. insurance company or agency,
7. pension consultant,
8. real estate broker or dealer, and/or
9. a sponsor or syndicator of limited partnerships

Certain supervised persons of WorthNet may participate in approved industry-related outside business activities ("OBAs"), including roles with other investment advisers or financial industry participants. For example, the Supervised Person, Marvin H. Barge, is also the Chief Compliance Officer for Infinity Capital Partners, a registered investment adviser. However, this individual does not provide investment advice, sell securities, or receive compensation from this outside firm. Furthermore, the services and oversight of WorthNet's Chief Compliance Officer, Joel D. Hergenreter, who is directly employed by AdvisorLaw, a compliance consulting firm. Neither of these OBAs presents a material conflict of interest with WorthNet or the provision of its advisory Promoter services. Additionally, WorthNet has policies and procedures in place to monitor, identify, and manage potential conflicts of interest, as well as safeguard the prioritization of User interests. This disclosure is provided to ensure transparency regarding the outside business activities of Supervised Persons, as required by regulatory guidelines.

Affiliated Entities

Worthnet is principally owned by Monument and Cathedral Holdings, LLC, which is indirectly owned by Cobblestone Publishing Inc. and Elizabeth W. P. Bonner Electing Small Business Trust. Monument and Cathedral Holdings, LLC, and Cobblestone Publishing, Inc. are holding companies with several subsidiaries across a wide range of businesses, including publishing companies focused on personal finance and investing, as well as health and travel. We do not refer Users to utilize the services or publications of the subsidiaries. Owners of Cobblestone Publishing Inc. and board members of WorthNet may hold equity in banks and thrift institutions. We will not refer you to use the services of these banks and thrift institutions.

Solicitation on Behalf of Other Advisers

Through our website, we refer Users to appropriately matched unaffiliated Partner Adviser RIAs on our platform that provide wealth management and financial planning services, as indicated in their Form ADV Part 2As. Before entering into a Promoter agreement with or introducing any unaffiliated RIAs, we conduct a due diligence review of the firms to confirm they are properly registered, licensed and in good standing with the applicable regulatory authority. The unaffiliated advisor must disclose any material conflict of interest that may impair the rendering of unbiased and objective advice that does not promote "fair, equitable or ethical principles." This disclosure aims to ensure that Users can make informed decisions and fully understand the advisory relationship in compliance with applicable regulations.

Other Financial Industry Professionals

We utilize third-party resources to support our operations, primarily in back-office and administrative functions. These resources include a network of professionals such as accountants, lawyers, and insurance providers, among others. We receive compensation for certain referrals, which will be disclosed in a separate statement provided to the User before engagement. In selecting third-party providers, we prioritize those that offer high value at low cost, ensuring they enhance our advisory services and act in the best interests of our referred investors, which aligns with our fiduciary responsibility.

Potential Conflicts of Interest

WorthNet and its Supervised Persons have a conflict of interest when we, or our Supervised Persons, receive compensation for

referring Users to the third-party Partner Advisers on our platform, as we have a financial incentive to recommend the services of these unaffiliated relationships.

Affiliates of WorthNet publish generalized financial advice, including research on specific securities and other investments. The opinions and recommendations in those publications may conflict with the information provided by WorthNet or the guidance, advice, or investment decisions made for a client by an unaffiliated referral RIA Partner Adviser. Neither WorthNet nor its RIA Partner Advisers takes direction, input, or guidance from the publications or their staff for investment decisions, nor do they have access to such publications before their public release.

WorthNet mitigates these conflicts by prioritizing the interests of User referrals above those of the Adviser and its Associated Persons. Referred Users are not obligated to utilize the services of any recommended RIA or service provider, contractually or otherwise. Our compliance policies, procedures, and Code of Ethics provide further details on our approach to managing conflicts of interest. A free copy of our Code of Ethics is available for review upon request.

Outside of the information referenced herein, neither WorthNet nor its management persons have any other material relationships or conflicts of interest with other financial industry participants. WorthNetN is not actively engaged in any other business not listed above.

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

Code of Ethics

WorthNet takes its regulatory and compliance obligations seriously and recognizes its duty to oversee the advisory activities of the Supervised Persons ("Associates") acting on its behalf. We believe every User deserves the highest level of trust and fair dealing, and we hold our Associates to rigorous standards of integrity and business practices. To support this commitment, we have adopted a Code of Ethics ("Code") that outlines our conduct standards in line with fiduciary responsibilities. We are dedicated to complying with all applicable laws and regulations.

WorthNet's Code establishes professional conduct guidelines for all Associates, requiring them to act in the best interests of Users and prioritize those interests above all else. Our Code applies to all Associates and may extend to others designated by the Chief Compliance Officer. Our goal is to protect the interests of our Users and Clients and demonstrate our commitment to honesty, good faith, and fair dealing, while prohibiting activities that could create or appear to create conflicts of interest. We also specify reporting requirements and enforcement procedures. Associates must fully adhere to industry regulations and the firm's guiding principles as outlined in our compliance policies and procedures, including the Code, and attest annually to their understanding of and compliance with these standards. Additionally, we provide annual training on our Code and diligently monitor the ongoing activities of all Associated Persons.

Participation or Interest in Client Transactions

Through its online platform, WorthNet refers appropriately matched Users to one or more unaffiliated Partner Adviser RIAs on our platform, which will manage their clients' accounts and provide investment advisory services and advice. Neither WorthNet nor any of its Associates participates in or has an interest in client account transactions.

Item 12: Brokerage Practices

WorthNet does not maintain relationships to recommend specific broker-dealers or custodians for User accounts. For detailed information on brokerage practices and the custodians used in connection with client accounts, please refer to the disclosure brochure and account documents of the engaged RIA.

Item 13: Review of Accounts

WorthNet does not review investment accounts or provide written reports. The referred RIA will be responsible for opening accounts for referred Users who elect to become their advisory clients, conducting periodic reviews, and providing written reports. The RIA's Qualified Custodian will send the referred RIA's client's written account statements, at least quarterly, itemizing activity and account transactions, specific investments held in the account, the portfolio's value, deposits, withdrawals and advisory fees that occurred during the period of the statement. These statements will be delivered by postal mail or electronically, as the client selects.

We urge referred RIA clients to promptly review any statements they receive directly from the Partner Adviser, custodian or otherwise upon receipt to ensure account transaction accuracy. Clients should also compare their account's investment performance against the appropriate benchmark applicable to the type of investments held, as well as any periodic information from their referred RIA.

WorthNet does not recommend brokers, dealers, or custodians and cannot guarantee the accuracy or completeness of any report or any other information provided by a referred RIA, the RIA's Custodian or another service provider.

We encourage referred Users who choose to become clients of any Partner Adviser to ask questions about the custody, safety, and security of their assets, as well as any statements they have received, and to report any inconsistencies. Should any inaccuracies or discrepancies in any reports received be identified, or if a client does not understand the information in any report, document or statement received, they should promptly *and, in all cases, before the next statement cycle*, report any items of concern to their referred RIA.

Item 14: Client Referrals & Other Compensation

Promoter Relationships

As a Primary Promoter, WorthNet's main advisory function is facilitating referrals and connecting prospective clients ("Users") with one or more unaffiliated, independent registered investment advisers ("RIAs") with whom the firm has established strategic relationships (referred to as our "Partner Advisers"), each a registered, unaffiliated RIA who is a Partner Adviser on our online matching Service platform. WorthNet discloses these relationships to each User as required by applicable law and in compliance with Rule 206(4)-1 under the Advisers Act regarding compensated endorsements. As indicated in Item 5: Fees & Compensation, our compensation consists of a portion of the ongoing account management fees charged by the unaffiliated RIAs. This arrangement will not result in referred Users paying higher advisory fees than they would otherwise incur.

A current list of WorthNet's Partner Adviser RIAs can be viewed at www.worthnet.com or by contacting us directly.

WorthNet plans to work primarily with established financial publishers to inform their readers about its services. This will likely include advertising our firm's services through various placements these publishers routinely make available to third-party advertisers, which may include image, video or HTML advertising space on their websites or in their email or other correspondence, "live read" style promotion of our services according to a pre-defined script, or similar such common advertising practices.

In some cases, those publishers make inventory available only on a 'performance marketing' basis, which means that instead of simply charging for impressions or distribution for ads, they may be paid based on their audience's response to the advertisement, such as charging a cost per click ("CPC"), per form filled by a prospective customer (cost per lead or "CPL"), per specific transactional milestone (cost per action or "CPA") like the successful charge of an initial fee or subsequent renewal fee, or a combination therein. We indicated a "Yes" on item 8. H(1) to reflect that these publishers may receive performance-based compensation from our firm, as is their common practice to maximize their advertising yield.

Our firm will be selective about the partners with whom we advertise, seeking to rely largely on well-established publishers with large audiences and robust advertising compliance programs. This will include thoroughly reviewing the types of materials they publish, checking reviews and other public commentary on their reputations, reviewing any relevant regulatory actions, and performing similar diligence on their primary spokespersons and company principals, as applicable. We will enter into contracts with each publisher that outline each party's responsibilities, including the publishers' only running advertisements as a whole and unaltered as provided to them by our firm. We will use their systems (such as programmatic ad management platforms and affiliate software designed for this purpose) or establish processes between their firms and ours (such as mandatory sends of test communications) to review all placements before final publication and regularly monitor the publications to ensure faithful reproduction and other compliance, making records of the placements in our archives whenever possible.

A conflict of interest exists when WorthNet or its Supervised Persons receive compensation for referrals to certain third-party advisers, as this creates an incentive to recommend investment advisers that offer higher compensation. However, we are committed to acting in the best interest of our Users and taking steps to mitigate this conflict by ensuring that recommendations are made based on the suitability of the investment adviser for the User's needs. Users are not obligated to use any

recommended Partner Adviser and can select alternative advisers.

Affiliated Promoters & Sub-Promoters

In addition to Worthnet serving as the Primary Promoter, certain Affiliates and Sub-Promoters of our firm are also authorized to refer potential Users to our platform (www.worthnet.com). Once referred, prospects may be connected with one of our Partner Adviser RIAs, who will subsequently become the RIA's client if they accept the prospect. These Affiliates and Sub-Promoters provide their referral services under our oversight.

WorthNet ensures that any Affiliated or Sub-Promoter we use is licensed when required and otherwise qualified to provide investment advice. Unlicensed Affiliated or Sub-Promoters are restricted from giving impersonal investment advice by recommending our services without commenting on portfolio construction or using advisory services. The terms of all Affiliated or Sub-Promoter arrangements are defined by a contract between the Affiliated or Sub-Promoter and WorthNet, which outlines the agreement's terms and the form of compensation, which is typically a percentage of the advisory fees that we receive from the RIAs on our platform, to whom we will introduce Users, as described below.

The terms of these relationships, including compensation and the disclosure of any conflicts of interest, are clearly disclosed to all parties in accordance with regulatory requirements, as required by applicable law and in compliance with Rule 206(4)-1 under the Advisers Act regarding compensated endorsements. Our compensation consists of a portion of the ongoing account management fees charged by the unaffiliated Partner Adviser RIAs on our platform, and we share a portion of our compensation with the Affiliated and Sub-Promoters under our oversight. This arrangement will not result in referred Users paying higher advisory fees than they would otherwise incur.

Referral arrangements inherently create potential conflicts of interest, particularly when the individual recommending an adviser receives economic benefit from the referral. As a result, and similar to the actions taken when WorthNet serves as Primary Promoter, all Affiliated and Sub-Promoters who refer Users on our behalf are required to disclose, in writing, the following to any referred prospective Users: (1) whether they are a Client or non-Client, (2) that they will be compensated for the referral, (3) the material conflicts of interest arising from the relationship and/or compensation arrangement, and (4) all material terms of the arrangement, including a description of the compensation provided for the referral.

Item 15: Custody

WorthNet does not exercise custody over client funds or securities and does not have access to them. All assets are held at the designated Qualified Custodians of each unaffiliated Partner Adviser RIA, which will provide account statements directly to clients at their address of record on a quarterly basis. We encourage our Users who choose to become clients of a referred RIA to ask the RIA about the custody, safety, and security of their assets.

Item 16: Investment Discretion

Management Style

Due to the nature of our advisory business, WorthNet does not maintain discretionary authority over User accounts. This authority typically resides with the referred RIAs, according to the management style selected in the Advisory Services Agreement between the client and RIA. The responsibility for managing client portfolios rests with the referred RIA.

Item 17: Voting Client Securities

WorthNet does not vote proxies or provide advice regarding proxy solicitations, securities involved in class actions, bankruptcies, or other legal proceedings. In most cases, Partner Adviser clients will receive proxy materials or other solicitations directly from the security issuer, custodian, transfer agent, or the referred RIA managing their account, who may vote on their behalf. The referred RIA's Form ADV 2A will detail their clients' responsibility for any class action suits, claims, bankruptcies, and other legal actions related to securities purchased or held in their RIA accounts.

Although WorthNet does not guide specific solicitations, referred investors can reach us through the "Contact Us" form on our website (www.worthnet.com), via our Customer Service email at compliance@worthnet.com, or by calling us directly at (667) 312-3548, for assistance in reaching the appropriate party - such as the security issuer, custodian, transfer agent, or the Partner Adviser RIA managing their account, who can address their questions and provide advice regarding these matters.

WorthNet does not provide legal or tax advice, engage in activities that might constitute the practice of law or accountancy, or represent Users or clients in legal proceedings involving securities held or previously held in their accounts. Clients should consult the disclosure brochures of their RIAs for information on these items.

Item 18: Financial Information

Balance Sheet, Financial Conditions & Bankruptcy Disclosures

WorthNet is not required to provide financial information in this Brochure because:

- we do not require nor solicit the prepayment of more than \$500 in fees per User, six months or more in advance,
- we do not take custody of client funds or securities, and
- neither WorthNet nor its Management Personnel has any financial conditions that are likely to reasonably impair our ability to meet our contractual commitments and fiduciary obligations to Users.

Neither WorthNet nor its management personnel have been subject to bankruptcy proceedings in the past 10 years.

Item 19: Requirements for State-Registered Advisers

Principal Executive Officers & Management Persons

The formal education and business background of WorthNet's Principal Executive Officers and Management Personnel are as follows:

Alex D. Daley is WorthNet's Founder, Managing Director and a Member of the Board. As of March 17, 2025, he assumed the role of Director of Growth for Monument & Cathedral LLC, the parent company of WorthNet. Mr. Daley began his career in information technology, working for his alma mater, Rutgers University, where he earned a Bachelor of Science degree in Computer Science. At his next stop, Microsoft, he worked across technology, business, and marketing strategy to bring research and lab efforts to market. In 2008, Alex turned his long-time passion for personal finance and investing into a career in financial publishing and services. He went on to leadership roles as founder, turnaround manager, M&A lead, or executive at several commodities dealers, a registered investment adviser, and financial media companies.

Nicole F. Sullivan is the General Counsel of WorthNet, LLC and The Agora Companies, overseeing legal and regulatory matters for both entities and is a Member of the Board of WorthNet. Ms. Sullivan graduated from St. John's College, Annapolis, MD, in 2002 with the equivalent of a double major in the history of math and science, along with minors in classics and comparative literature. She went on to earn a Juris Doctor (J.D.), magna cum laude, from the University of Baltimore School of Law and is a licensed attorney. In 2005, she joined The Agora Companies, a global publisher of financial newsletters that reaches millions of readers, where she has held key roles in the legal and compliance functions. Today, as General Counsel, she provides strategic legal guidance to Worthnet LLC and The Agora Companies.

Danielle D. O'Dell is the CEO & Director, Partnerships at WorthNet. Mrs. O'Dell holds a Bachelor of Arts from the University of Delaware, graduating magna cum laude. She began her career in 2005 at The Agora Companies as a Marketing Coordinator and spent 16 years there, rising to be Executive Director of Finance and Operations at Money Map Press. In July 2021, she transitioned to Avalon, an early-stage money management firm, where she served as Chief Operating Officer, leading efforts to scale the company and drive AUM growth. In November 2024, Danielle joined WorthNet, bringing over two decades of experience in business development, marketing, and operations. She has played a key role in scaling organizations, optimizing marketing strategies, and driving revenue growth. Her expertise in brand strategy, affiliate partnerships, and operational leadership has been instrumental in building sustainable growth and expanding market reach.

Joel D. Hergenreter serves as the Outsourced Chief Compliance Officer of WorthNet, where he is responsible for creating, establishing, administering, and directing the firm's Compliance Program. He performs this role through his employment with AdvisorLaw, a compliance consulting firm. Mr. Hergenreter received his Bachelors of Arts from Colorado State University in European Studies, while also completing studies at Otto-Friedrich-Universität Bamberg in

Bamberg, Germany. Mr. Hergenreter began his career in financial services with Equitable Advisors in New York, New York during 2021. Mr. Hergenreter then transitioned to compliance and consulting services during 2022 with AdvisorLaw in Broomfield, Colorado, where he initially served as a compliance consultant for investment advisers and then was elevated to a senior role. Within this capacity, Mr. Hergenreter has served as an outsourced chief compliance officer for several investment advisers..

Other Business Activities

WorthNet is not actively engaged in any business besides advisory services, as described herein. The business activities of the firm's Principal Executive Officers and Management Personnel are described above.

The approved outside business activities of each Advisor Representative are reflected in each Supervised Person's Form ADV Part 2B Brochure Supplement.

Performance Fees

Neither our firm nor any persons associated with our firm are compensated for providing WorthNet's advisory services with performance-based fees. *(Please refer to Item 11: Code of Ethics, Participation or Interest In Client Transactions & Personal Trading section for additional information on this topic.)*

Reportable Events

Neither WorthNet nor any of its Management Persons has been involved in one of the events listed below:

1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500 involving any of the following:
 - an investment or an investment-related business or activity,
 - fraud, false statement(s), or omissions,
 - theft, embezzlement, or other wrongful taking of property,
 - bribery, forgery, counterfeiting, extortion, or
 - dishonest, unfair, or unethical practices.
2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
 - an investment or an investment-related business or activity,
 - fraud, false statement(s), or omissions.
 - theft, embezzlement, or other wrongful taking of property,
 - bribery, forgery, counterfeiting, extortion, or
 - dishonest, unfair, or unethical practices.

Please also refer to *Item 9: Disciplinary Information* for additional information.

Relationships With Issuers of Securities

Please refer to Item 10: Other Financial Industry Activities & Affiliations. Further to that information, neither WorthNet nor any of its Management Personnel has any relationship or arrangement with any securities issuer, which is not already disclosed in *Item 10: Other Financial Industry Activities & Affiliations*.

Item 20: Additional Information

Information Security Program

WorthNet maintains an Information Security Program to reduce the risk that Users' personal and confidential information is breached. Please contact us directly with any questions regarding this Program. Our contact information is as follows:

WorthNet, LLC
16 W. Madison Street
Baltimore, MD 21201
Telephone: (667) 312-3548
www.worthnet.com

Privacy Practices

As a provider of personal financial services, we are legally obligated to inform Users about our privacy policies concerning their information. At WorthNet, safeguarding our Users' private information is a top priority. We are committed to maintaining stringent confidentiality standards that surpass legal requirements. Client privacy, professional ethics, and delivering high-quality financial services are paramount to us.

To ensure the privacy and security of User information, we have implemented policies and procedures that comply with applicable privacy laws. We collect non-public personal information either directly from Users or with their authorization. We do not disclose this information to nonaffiliated third parties except as permitted by law. When providing referral recommendations, should you choose to engage with our unaffiliated RIAs, we may share relevant information with them and our service providers, such as accountants and attorneys, while emphasizing the confidential nature of this data.

Access to non-public personal information is limited to employees who require it to deliver our services. We maintain physical, electronic, and procedural safeguards in line with regulatory standards to protect the integrity and confidentiality of your information.

We will not sell or share your information unless necessary to further a relationship with an unaffiliated RIA at your request or as mandated by law.

We retain records related to our services to assist Users effectively and comply with professional guidelines. Please note that specific state laws may impose additional privacy requirements, which we will adhere to. We encourage you to contact us for a copy of our complete Privacy Notice, which details the types of information collected, its use, Users' rights to opt out of certain disclosures, procedures for updates to the privacy policy, and contact information for any privacy concerns.