Item 1 - Introduction: ***Is an investment advisory account right for me?***

There are different ways that you can get help with your investments. You must carefully consider which types of accounts and services are right for you. Wealthn LLC ("Wealthn"), doing business as UP Fintech Asset Management, is an investment adviser registered with the Securities and Exchange Commission ("SEC") and provides investment advisory services. It does not provide brokerage services. Wealthn is an indirect wholly owned subsidiary of UP Fintech Holding Ltd (NASDAQ: TIGR) and is registered as a Commodity Trading Adviser and Commodity Pool Operator with the Commodity Futures Trading Commission and is a member of the National Futures Association. Investment advisory and brokerage services and their respective fees differ materially. It is important for you to understand the difference. This document gives you a summary of the types of services Wealthn provides and how Wealthn is compensated. Please feel free to ask us for more information – suggested questions are provided herein as examples. Free and simple tools are available to you by the SEC to help assess firms and financial professionals at https://www.investor.gov/CRS, which provides free educational materials about investment advisers, broker-dealers, and investing in general.

Item 2 - Relationships and Services: ***What investment services and advice can you provide me?***

Wealthn provides Internet-based investment advisory services to retail investors and various organizations by developing and recommending portfolios of mutual funds, ETFs, and securities designed to meet client-specific investment objectives and guidelines provided in an online-based investment questionnaire. Clients may impose limited restrictions on investing in specific securities or security types. Separately managed account advisory services may be similar to or different from services provided to other investment vehicles. Wealthn monitors client portfolios to ensure consistency with stated objectives. Wealthn has discretion over investment selection and trading.

Wealthn directs all Client trades to Interactive Brokers LLC for execution and clearing. In certain instances where the Firm provides investment advisory services to clients of Tiger Brokers (Singapore) Pte. Ltd., the Firm will direct such trades to Tiger Brokers (Singapore) Pte Ltd.

Conversation Starter

- ***Given my financial situation, should I choose an investment advisory service? Why or why not?***
- ***How will you choose investments to recommend to me?***
- ***Under what circumstances do you invest my money in a fund you advise?***
- ***What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?***

Item 3 - Fees, Costs, Conflicts, and Standard of Conduct: ***What fees will I pay?***

Wealthn is compensated for investment advisory services based on fees calculated as a percentage of assets under management which range from 0.25% to 2.00% for separately managed accounts. Fees are deducted from client accounts subject to terms and conditions detailed in each client's investment management agreement. Wealthn fees do not include brokerage commissions, transaction fees, or other related costs and expenses incurred such as wire transfer and electronic fund fees. These costs are in addition to the advisory fees charged by Wealthn.

Client portfolios may be invested in mutual funds or ETFs to gain access to certain sectors, markets, or securities. Investments in these funds include an embedded investment management fee paid to the specific mutual fund or ETF adviser, as well as other fees and expenses associated with a particular mutual fund or ETF. As such, client portfolios are generally subject to two layers of advisory fees on the portion of their account invested in mutual funds and ETFs – fees charged by Wealthn and fees charged by the mutual fund or ETF adviser. Clients are responsible for all fees and expenses charged by the mutual fund or ETF in addition to the management fee charged by Wealthn.

Fees charged on a percentage of assets under management inherently subject Wealthn to potential conflicts of interest in that the more assets in your advisory account, the more you will pay in fees, and thus an incentive to encourage an increase of assets in the account. Wealthn seeks to mitigate such conflicts by acting in your best interest and not putting our interests ahead of yours, as well as having in place certain compliance policies and procedures.

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. For more information on Wealthn's fees, see our Form ADV Part 2A brochure, Section 5, Fees and Compensation.

Conversation Starter

- ***Help me understand how these fees and costs might affect my investments. If I give you $100,000 to invest, how much will go to fees and costs, and how much will be invested for me?***
- ***How do you address the conflicts inherent in recommending funds for which you are paid as an adviser? Are there conditions or limits on such allocations?***

What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

When we act as your investment adviser, we must act in your best interest and not put our interest ahead of yours. At the same time, the way we make money can create a conflict of interest. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Examples are provided herein to help you understand what this means.

Conversation Starter

- ***How might your conflicts of interest affect me, and how will you address them?***

How do your financial professionals make money?

Wealthn's financial professionals are compensated by salary and a bonus based on the profitability of the Firm and other factors. Additionally, Wealthn's principals may be compensated through ownership in parent company stock. Wealthn may receive referrals from other professionals but does not compensate any person for such referrals. Neither the Firm nor its professionals receive any commissions or revenue from products recommended to clients.

Item 4 - Disciplinary History: ***Do you or your financial professionals have legal or disciplinary history?***

No Wealthn employee has a legal or disciplinary history. All clients and prospective clients are advised to research Wealthn and its investment professionals using the free and simple search tool at https://www.investor.gov/CRS.

Conversation Starter

- ***As a financial professional, do you have any disciplinary history? For what type of conduct?***

Item 5 - Additional Information:

Additional information about Wealthn, including services, fees, and financial industry relationships, are provided in Wealthn's Form ADV, available at www.adviserinfo.sec.gov. Wealthn's Form ADV Part 2A Brochure is available free of charge by contacting us at 480-631-4700 or compliance@upfintecham.com. Free and simple tools are available to you to "check out" Wealthn and its financial professionals at https://www.investor.gov/CRS, which provides free educational materials about broker-dealers, investment advisers, and investing.

Conversation Starter

- ***Who is my primary contact person? Does he or she represent an investment adviser or a broker-dealer?***
- ***Who can I talk to if I have concerns about how this person is treating me?***