Vestie, Inc. Form ADV Part 2A – Firm Brochure

Item 1 – Cover Page

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This brochure provides information about the qualifications and business practices of Vestie, Inc. If you have any questions, please contact us at hey@vestie.com.

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.

Registration as an investment adviser does not imply a certain level of skill or training.

Additional information about Vestie, Inc. is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Material Changes

This is the initial brochure for Vestie, Inc. The firm is newly registering with the U.S. Securities and Exchange Commission.

Item 3 – Table of Contents

Item 4 – Advisory Business

The Firm: Vestie, Inc. (“Vestie,” “the Firm,” “we”) is a registered investment adviser organized under the laws of Delaware. Vestie was founded in 2025 and is wholly owned by Dana Bentz.

Vestie is an internet investment adviser. Vestie provides investment advice to its clients exclusively through its interactive website and mobile application. Clients supply personal and financial information through the platform. Vestie provides **discretionary investment management services** to individual clients. Advisory services are delivered through software-based and **risk-based model portfolios** constructed using exchange-traded funds (“ETFs”) designed to provide diversified exposure to equity and fixed income markets. Vestie does not provide individualized investment advice to clients outside the platform, other than technical or administrative support.

Advisory Services: Vestie personalizes investment advice based on each client's **selected risk profile**. Clients choose among three risk-based portfolio options:

- Conservative
- Balanced
- Growth

Each portfolio reflects differing levels of risk tolerance, expected volatility, and investment objectives. Vestie uses the selected risk profile to determine asset allocation, portfolio construction, and ongoing management decisions.

How We Tailor Our Advice: During onboarding, Vestie's interactive platform collects information about each client's financial situation, investment objectives, risk tolerance, time horizon, and investment experience. Vestie's software-based model used this information to assign the client to a risk-based model portfolio and to manage that portfolio on an ongoing basis, Clients may update their information or change their risk profile through the platform at any time, and Vestie adjusts the advice accordingly. Clients may request reasonable restrictions on investing in particular securities or types of securities; Vestie will accommodate reasonable restrictions and will inform the client if a requested restriction cannot be accommodated.

Wrap Fee Programs: Vestie does not sponsor or participate in wrap fee programs. Vestie provides discretionary investment management exclusively through its interactive platform and charges a flat subscription fee, as described in Item 5. Clients pay any brokerage or transaction costs charged by the custodian separately from Vestie's advisory fee.

Vestie's investment advice is limited to exchange-traded funds (EFTs) and cash or cash-equivalent positions.

Assets Under Management: As of July 1, 2026, Vestie manages approximately **$125.00** in regulatory assets under management.

Item 5 – Fees and Compensation

Vestie charges a flat advisory fee of **$14 per month** or **$139 annually**, billed in advance. Clients may choose monthly or annual billing. Fees are paid by credit card through Stripe with client authorization.

Refund Policy

Vestie's advisory fee is billed in advance. If a client terminates services mid-month or mid-year, Vestie will refund any prepaid but unearned advisory fee on a pro-rata basis, calculated through the effective date of termination, within thirty (30) days.

Clients who cancel within seven (7) calendar days of upgrading to a paid plan will receive a full refund of that billing period's fee. Vestie does not retain prepaid fees for advisory services it does not provide.

Other Fees and Expenses

In addition to Vestie's advisory fee, clients may incur additional costs charged by third parties, including:

• Brokerage or transaction fees charged by the custodian, Alpaca Securities LLC
• Fund-level expenses such as ETF expense ratios

Vestie does not receive any portion of these third-party fees.

Vestie charges a flat subscription fee rather than an asset-based fee. Depending on a client's account size and trading activity, the total cost of Vestie's services, as a percentage of assets, may be higher or lower than fee charged by other advisers for similar services. Clients with smaller account balances may pay more, as a percentage of assets, than they would under a typical asset-based fee. Clients should consider whether, given their account size and the services provided, Vestie's fee is reasonable relative to the services and to fees charged by other advisers. Vestie has determined that its fee is reasonable in relation to the services it provides.

Item 6 – Performance-Based Fees and Side-By-Side Management

Vestie does not charge performance-based fees.

Item 7 – Types of Clients

Vestie provides investment advisory services primarily to individual clients. We do not currently advise pension plans, charitable organizations, or pooled investment vehicles.

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

Vestie's advice is personalized to each client. Through the interactive platform, Vestie elicits each client's financial situation, level of financial sophistication, investment experience, and financial goals and objectives, and uses that information to recommend and manage a risk-based model portfolio suited to the client. The selection and ongoing management of a client's portfolio are based on the personal information the client supplies; Vestie does not provide impersonal advice. Vestie's model portfolios are the means of implementing personalized advice, not a substitute for it. As a fiduciary, Vestie acts in each client's best interest, consistent with the standard of conduct described in Advisers Act Release No. 5248.

Vestie employs a **strategic asset allocation approach**, using diversified portfolios of ETFs aligned with each client's selected risk profile.

Investment strategies are designed for long-term investment objectives and may include allocations to equity, fixed income, and cash-equivalent securities.

Risk of Loss

All investments involve risk, including the possible loss of principal. Market risk, interest rate risk, inflation risk, and other economic factors may adversely affect portfolio performance. Clients should be prepared to bear the risk of loss associated with investing in securities.

Item 9 – Disciplinary Information

Vestie and its management personnel have no reportable disciplinary events.

Item 10 – Other Financial Industry Activities and Affiliations

Vestie has not affiliations with, and is not under common control with, any other investment adviser. Item 11 – Code of Ethics, Participation or Interest in Client Transactions, and Personal Trading

Vestie has adopted a Code of Ethics designed to comply with applicable SEC requirements. Employees may invest in securities that are also recommended to clients; however, such transactions are monitored to identify and mitigate potential conflicts of interest.

A copy of the Code of Ethics is available upon request.

Item 12 – Brokerage Practices

Vestie requires that client accounts be maintained at **Alpaca Securities LLC**, a qualified custodian, which executes all trades. Vestie does not receive compensation from Alpaca.

Clients may pay brokerage commissions or transaction fees as established by the custodian.

Item 13 – Review of Accounts

Vestie monitors client portfolios on an ongoing basis once advisory services commence and rebalances portfolios as deemed appropriate based on the selected risk profile and market conditions.

Clients receive account statements directly from the custodian at least quarterly.

At least quarterly, Vestie reminds each client through the platform to update their information and to notify Vestie of any change in financial situation or investment objectives, or any reasonable restriction the client wishes to impose or modify.

At least annually, Vestie contacts each client to determine whether there have been any such changes. Clients retain all indicia of ownership of the securities in their accounts and receive account statements directly from the qualified custodian, Alpaca Securities LLC, at least quarterly.

Item 14 – Client Referrals and Other Compensation

Vestie does not currently compensate any person for client referrals. Vestie may implement a referral program in the future, in which case appropriate disclosures will be provided in accordance with applicable SEC rules.

Item 15 – Custody

Client assets are held by Alpaca Securities LLC, a qualified custodian. Vestie does not hold client funds or securities. Because advisory fees are paid directly by clients via credit card and are not deducted from client accounts, Vestie is not deemed to have custody of client assets.

Item 16 – Investment Discretion

Clients grant Vestie discretionary authority to manage investments within the selected model portfolio. Vestie determines which securities are purchased and sold and the timing of transactions.

Clients may change their selected portfolio but do not direct individual trades.

Item 17 – Voting Client Securities

Vestie does not vote proxies and forwards proxy materials to clients for their own voting decision.

Item 18 – Financial Information

Vestie has no financial condition that would reasonably impair its ability to meet contractual commitments to clients. Vestie has not been the subject of a bankruptcy petition.

Item 19 – Requirements for State-Registered Advisers

Not applicable. Vestie, Inc. is registered with the U.S. Securities and Exchange Commission.