Form ADV Part 2A Firm Brochure

Item 1 – Cover Page

She Wealth Advisors, LLC

CRD# 337375

5126 Clareton Dr. Ste. 206, Agoura Hills, California 91301

Phone: (818) 517-1725
Email: vanessa@she-wealth.com
Website: www.she-wealth.com

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This brochure provides information about the qualifications and business practices of She Wealth Advisors, LLC. If you have any questions about the contents of this brochure, please contact us at 818-517-1725 or vanessa@she-wealth.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Additional information about She Wealth Advisors, LLC also is available on the SEC's website at www.adviserinfo.sec.gov. Registration does not imply a certain level of skill or training.

Item 2 – Material Changes

Since the firm's last brochure update, She Wealth Advisors, LLC has updated its principal office address to 5126 Clareton Dr., Suite 206, Agoura Hills, CA 91301. No other material changes have been made to the firm's advisory services, fees, or business practices.

Item 3 – Table of Contents

Item 4 – Advisory Services
She Wealth Advisors, LLC ("She Wealth") was formed in September 2025 as a California-based investment advisory firm. However, the underlying legal entity and tax identification number were originally established in September 2003 under the name Rehab Solutions, LLC with dba. Ergonomic Connection, which operated solely as a non-financial business providing ergonomic furniture and accessories to businesses and had no involvement in investment advisory or financial services.

No investment advisory activities were conducted under the prior business name, and the firm did not hold itself out as an investment adviser, nor did it accept compensation for investment-related services, at any time prior to 2025.

In 2025, the firm underwent a rebranding and business model transition to become She Wealth Advisors, LLC, a state-registered investment advisory firm in California. The change involved a new business purpose, new service offerings, and registration through the Investment Adviser Registration Depository (IARD). She Wealth Advisors, LLC is wholly owned and managed by Vanessa Friedman. She Wealth Advisors, LLC was approved as a state-registered investment adviser in California in October 2025.

She Wealth Advisors offers the following services:

Coaching & Education Services : We offer individualized coaching sessions focused on trading techniques, including strategy development, technical analysis, risk management, and market behavior. These sessions are strictly educational and do not involve personalized investment advice, portfolio management, or securities recommendations. Coaching is available to both clients and non-clients. Coaching is billed as described in Item 5.

For purposes of this disclosure, "non-clients" refers to individuals who do not engage She Wealth Advisors, LLC for discretionary investment management services and whose assets we do not manage. These individuals may access one-time or short-term coaching services without establishing an advisory relationship.

Discretionary Portfolio Management
We provide ongoing discretionary investment management for high-net-worth individuals, families, and small institutions.
Portfolios are tailored to each client's goals, risk tolerance, time horizon, and liquidity requirements. Strategies may include dynamic asset allocation using ETFs, U.S. equities, options, leverage, short selling, individual securities, and futures.
We implement trades without seeking prior approval for each transaction, within the scope defined in the Investment Advisory Agreement.

We tailor our advisory services to the individual needs of each client. During onboarding, we gather relevant financial and personal information to develop a strategy aligned with the client's objectives. Clients may impose reasonable restrictions on investing in specific securities, sectors, or asset classes. These restrictions must be submitted in writing and are subject to approval based on feasibility within a discretionary framework. We make every effort to accommodate such restrictions when possible.

She Wealth Advisors may recommend limited cryptocurrency exposure only through exchange-traded products (ETPs), trusts, or futures contracts listed on regulated U.S. exchanges such as the NYSE, NASDAQ, or CFTC-regulated futures markets. We do not recommend or facilitate direct purchases of cryptocurrency through unregulated platforms (e.g., Coinbase, Binance, etc.). Such exposure is limited to qualified clients with higher risk tolerance, sufficient liquidity, and a demonstrated understanding of the risks involved.

Financial Planning & Consulting (Third-Party)
She Wealth Advisors may refer clients to an unaffiliated Certified Financial Planner™ (CFP®) or planning firm for comprehensive financial planning. At this time, no specific third-party firm has been selected. Any referrals will be disclosed to the client in writing before engagement. She Wealth does not share in financial planning fees but may receive a referral fee if applicable under a separate solicitor agreement.

If you desire implementation assistance, clients may engage She Wealth for portfolio management under our standard AUM fee schedule; however, the financial plan itself is prepared and delivered by the third party.
Fees for financial planning are negotiated directly between you and the third-party planning firm; She Wealth does not share in planning revenue.

Tailoring of Services and Client-Imposed Restrictions

We tailor our discretionary portfolio management services to the individual needs of each client. During onboarding, we gather relevant financial and personal information to develop a strategy aligned with the client's objectives. Clients may impose reasonable restrictions on investing in specific securities, sectors, or asset classes. These restrictions must be submitted in writing and are subject to approval based on feasibility within a discretionary framework.

Asset Allocation Guidance for Employer-Sponsored Retirement Plans
When providing allocation guidance to retirement plan participants, we consider each participant's goals, risk tolerance, time horizon, and the specific investment options available within their plan. While recommendations are limited to the plan's menu of investments, our guidance is tailored to the individual's circumstances. Participants may request reasonable restrictions on allocation among available funds, and we will make every effort to accommodate such restrictions within the constraints of the plan's offerings.

Educational Newsletter: She Wealth Advisors, LLC publishes an educational newsletter that covers general market insights, economic trends, trading concepts, and behavioral finance topics. The content is intended for informational and educational purposes only and does not contain individualized investment advice or specific securities recommendations.

The newsletter is made available to clients and non-clients and is not a component of our discretionary portfolio management service.

Wrap Fee Programs: She Wealth Advisors, LLC does not sponsor or participate in any wrap fee programs.

Assets Under Management: As of December 31, 2025, She Wealth Advisors, LLC manages approximately $1,445,723 in client assets on a discretionary basis. The firm does not manage any client assets on a non-discretionary basis. Asset values are calculated based on market value as reported by the qualified custodian.

Item 5 – Fees and Compensation

Discretionary Portfolio Management Fees

She Wealth Advisors charges an annual asset-based fee for discretionary portfolio management services. Clients will not be charged a total management fee over the 3% industry average. The fee structure is as follows:

AUM	**Annual Fee**
Up to $500,000	2.50%
$500,001 to $1,000,000	2.25%
$1,000,001 to $2,000,000	2.00%
Over $2,000,000	1.50%

Example:
If a client has $1,500,000 in assets under management, the entire account would be billed at the 2.00% rate for that tier.

- $1,500,000 × 2.00% = $30,000 annual advisory fee
- This equals $2,500 per month when billed in arrears on a monthly basis.

The specific percentage charged within this range is determined based on factors such as the selected investment strategy, level of trading activity and portfolio customization, complexity of the client's portfolio, and the overall relationship with She Wealth Advisors. Please note that lower fees for comparable services may be available from other sources. The minimum investment amount may be negotiable under certain circumstances, including consideration of the client's total household assets under management, existing client relationships, or other relevant factors. We typically deduct advisory fees directly from client accounts held at a qualified custodian, pursuant to the client's written authorization. Fees are calculated based on the average daily balance of the account, as reported by the custodian, and are billed in arrears on a monthly basis.

Each time a fee is deducted, She Wealth Advisors, LLC provides the client with an itemized invoice showing the amount of the fee, the calculation method, the average daily account value on which the fee was based, and the applicable billing period, and provides a copy of the invoice to the qualified custodian. Clients authorize She Wealth Advisors, LLC to deduct advisory fees, including the initial setup and onboarding fee, directly from their investment accounts held with a qualified custodian, and clients receive account statements directly from the qualified custodian reflecting all fee deductions.

Initial Setup / Onboarding Fee

She Wealth Advisors, LLC may charge a one-time initial setup and onboarding fee of up to $250. This fee is charged at the commencement of the advisory relationship and is intended to cover the administrative and advisory services associated with onboarding a new client. These services may include, but are not limited to, initial consultations, gathering and reviewing financial information, coordination with custodians, account setup, development of an initial investment strategy, and implementation planning.

This setup fee is separate from and in addition to any ongoing asset-based advisory fees and is not based on the amount of client assets under management. With the client's written authorization, the setup fee will be deducted directly from the client's investment account.

The setup fee is non-refundable once services have commenced. Fees are negotiable based on client circumstances.

Coaching & Educational Fees
Hourly Rate: $200 per hour for one-on-one coaching sessions (minimum 1-hour increments). Coaching fees are invoiced immediately and payable upon receipt. The hourly rate may be negotiable.

Third-Party Financial Planning Fees
Financial planning services are provided by an unaffiliated Certified Financial Planner™ (CFP®) or planning firm. No specific third-party firm has been selected at this time. Clients will pay the planning firm directly. She Wealth Advisors, LLC does not share in planning revenue but may receive a referral fee if a solicitor agreement is in place. If you choose to implement

recommendations from the plan through She Wealth, you will pay our standard AUM fees for discretionary management.

Asset Allocation Guidance for Retirement Plans
$200 per hour for any guidance or plan rebalancing advice. These services are billed upon completion unless otherwise agreed in writing.

Educational Newsletter
The newsletter is currently offered free of charge to all subscribers.

Payment Methods
For coaching, educational sessions, and other project-based services, clients are billed directly. Accepted payment methods include credit card, check, wire transfer, or ACH. She Wealth Advisors does not store clients' credit card information on file for recurring charges. All credit card payments are processed individually at the time of billing through a secure, third-party payment processor. As such, She Wealth Advisors does not have custody or possession of client funds or securities

Other Fees and Expenses (5.C)

In addition to the advisory fees described above, clients may incur other costs related to their investment accounts. These may include, but are not limited to:

- Custodial fees charged by the account custodian
- Brokerage commissions
- Transaction fees
- Exchange fees
- Internal management fees and expenses of mutual funds, ETFs, or other pooled investment vehicles

She Wealth Advisors does not receive any portion of these fees or expenses. For more information, please see Item 12 – Brokerage Practices.

Cryptocurrency-Related Fees
Clients investing in cryptocurrency may incur additional costs such as trading fees charged by digital asset exchanges, custody fees, and network transaction ("gas") fees. These costs are separate from, and in addition to, our advisory fees.

Cryptocurrency exposure is only billed when held through exchange-traded products or futures contracts at qualified custodians. These assets are included in AUM at their market value as reported by the custodian. We do not include self-reported wallet balances or assets held outside of regulated custodians. She Wealth Advisors does not custody cryptocurrency directly and does not facilitate client accounts at unregulated crypto trading platforms.

Fee Billing and Termination (5.D)

All fees are described in our Investment Advisory Agreement. You may terminate the agreement at any time by providing thirty (30) days' written notice. Either party may terminate the agreement with such notice. Because advisory fees are billed monthly in arrears, there is no refund policy necessary for unearned fees. Coaching fees are non-refundable once services are rendered. Clients may terminate their accounts without penalty within five (5) business days of signing the advisory contract.

Compensation for Product Sales (5.E)

Neither She Wealth Advisors, LLC nor any supervised person accepts compensation for the sale of securities or other investment products. We do not receive commissions, asset-based sales charges, or service fees from the sale of mutual funds, annuities, or other financial products. We are a fee-only advisory firm.

Household Account Aggregation

At our discretion, we may combine the account values of family members living in the same household to determine the applicable management fee. For example, we may combine account values for you and your minor children, joint accounts with your spouse, and other types of related accounts. Combining account values may increase the asset total, which may result in your paying a reduced management fee based on the available breakpoints.

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

She Wealth does not charge performance-based or incentive fees. All fees are either assets under management fees, fixed fees, or hourly rates. Therefore, there is no side-by-side management of accounts where one client pays a performance fee and another does not.

Item 7 – Types of Clients and Account Minimums

Types of Clients:

- Individuals
- High-Net-Worth Individuals
- Trusts, Estates, or Charitable Organizations
- Corporations or Business Entities

Account Minimums:

Discretionary Portfolio Management: $500,000 minimum in investable assets. Exceptions may be made at our discretion (e.g., family referrals).

Financial Coaching: No minimum—available on an as-needed hourly basis.

Asset Allocation Guidance for Retirement Plans: No minimum. Compensation is billed on an hourly basis ($200/hour), as described in Item 5.

We reserve the right to refuse service to any prospective client for any reason.

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

Methods of Analysis

Fundamental Analysis:
We analyze company financials, earnings reports, industry trends, and macroeconomic data. We build both qualitative and quantitative models to project earnings growth, cash flows, and valuation metrics (e.g., P/E, EV/EBITDA).

Technical Analysis:
We use chart patterns, trendlines, moving averages, RSI, MACD, and volume analysis to identify short- to medium-term trading opportunities based on momentum indicators.

Quantitative Screening:
We screen securities using predefined criteria such as valuation, momentum, and volatility to identify trade candidates.

Options Greeks & Volatility Analysis:
We evaluate implied vs. historical volatility and analyze delta, gamma, theta, and vega to assess options strategies. We use covered calls, protective puts, and volatility spreads to manage risk and generate income.

Investment Strategies

Dynamic Asset Allocation:
We adjust allocations among equities, bonds, and cash based on our tactical outlook, which may be informed by economic indicators, market sentiment, or technical conditions. We maintain core positions in low-cost ETFs and overlay tactical trades for short-term opportunities.

Equity Long/Short:
We take long positions in undervalued or high-momentum securities and short positions in overvalued or negative-trend securities. Short positions may include individual stocks or sector ETFs.

Options Income & Risk Management:
We use covered calls to generate income and protective puts to hedge downside risk. Additional strategies may include vertical and calendar spreads to manage volatility exposure.

Leverage & Margin:
For **qualified clients**, we may employ margin or futures with explicit written consent. Leverage is capped at 50% of net portfolio value to manage risk.

Qualified clients are defined under Rule 205-3 of the Investment Advisers Act of 1940 as individuals or entities with either: (a) at least $1.1 million in assets under management with the adviser, or (b) a net worth of at least $2.2 million, excluding the value of the client's primary residence.

Rebalancing & Tax Management:
We rebalance portfolios quarterly or when allocations deviate more than 5% from targets. We also consider tax implications such as tax-loss harvesting and capital gains management in taxable accounts.

Risk of Loss

Investing in securities involves a risk of loss that clients should be prepared to bear.

Strategy-Specific Risks

Each strategy or method of analysis used by She Wealth Advisors carries specific material risks:

- **Options Strategies:** Options involve significant risk and are not suitable for all investors. Writing uncovered options may expose clients to substantial losses. Spread strategies may limit both loss and gain.

- **Margin and Leverage:** Borrowing funds amplifies gains and losses. Market downturns may result in losses exceeding invested capital. Clients may be subject to margin calls.

- **Short Selling:** Short positions carry unlimited loss potential if the price of the security rises. Other risks include stock recalls, borrow costs, and timing mismatches.

- **Dynamic Asset Allocation:** Tactical shifts may underperform a static or passive allocation. Misjudgments in timing or macroeconomic outlook may result in losses.

- **Concentration Risk:** Tactical or thematic trades may expose clients to volatility and sector-specific risks due to limited diversification.

- **ETF and Fund Risks:** ETFs may carry internal expenses, tracking error, and liquidity risks. Leveraged or inverse ETFs are particularly volatile and may not perform as expected.

- **Cryptocurrency Exposure:** She Wealth Advisors may recommend cryptocurrency exposure only through regulated U.S. exchange-traded products (ETPs), trusts, or futures contracts. We do not recommend direct purchases of cryptocurrencies on retail trading platforms or through self-custodied wallets. This exposure is limited to qualified clients with a high risk tolerance and is not suitable for all investors.

If used, crypto-related investments carry heightened risks including, but not limited to:

- **Volatility Risk** – Extreme price swings may result in significant losses over short periods.
- **Liquidity Risk** – Certain crypto assets may have thin markets, making it difficult to sell quickly without price impact.
- **Regulatory Risk** – Cryptocurrency markets are evolving and may be subject to new or changing regulations that affect value or legality.
- **Technology Risk** – Vulnerabilities in blockchain networks, coding errors, or hacking may lead to losses.
- **Operational Risk** – Exchanges or custodians may experience outages, insolvency, or mismanagement.
- **Legal/Classification Risk** – Not all crypto assets are considered securities. Some may be treated as commodities, currencies, or unregulated digital property, which affects client protections.
- **Theft & Fraud Risk** – Crypto assets are targets for theft through hacking, phishing, and fraud schemes. Losses from theft may not be recoverable.

Types of crypto assets include cryptocurrencies (e.g., Bitcoin, Ethereum), stablecoins (linked to fiat currency), utility tokens (providing access to services), and security tokens (investment contracts). Each category has unique risks. Clients should understand these differences before investing.

General Investment Risks

Market Risk:
All investments carry the risk of loss. Market fluctuations, economic cycles, and external shocks may negatively affect investment value. Securities are not insured by the FDIC or any government agency.

Loss of Value:
There is no guarantee any investment will achieve its objectives. Values may fall due to market or issuer-specific factors. Clients may not recover their original investment.

Interest Rate Risk:
Rising interest rates generally lead to lower prices for bonds and fixed-income securities. Long-term bonds are particularly sensitive to rate changes.

Credit Risk:
Issuers may default on interest or principal payments. Downgrades or deteriorating financial conditions may increase volatility or reduce liquidity.

Foreign Exchange Risk:
Investments in foreign securities may be affected by currency fluctuations, political instability, or changes in regulation. Exchange rate changes can impact returns positively or negatively.

Equity Risk:
Stock prices fluctuate based on company performance, industry conditions, and general market sentiment. There is a risk of capital loss, including total loss in the event of bankruptcy.

ETF Risk:
Investments in ETFs are subject to market risk, and in some cases may involve additional risks such as liquidity constraints, leveraged exposure, or tracking error.

Recommendation of Particular Types of Securities

We may advise on a variety of securities including stocks, ETFs, options, and other publicly traded instruments. We do not favor one type of security over another, as each client has unique goals and risk tolerance. Each type of security carries its own set of risks, which we disclose where applicable.

Although we generally avoid strategies involving unusual or excessive risk, we do use options strategies, including writing covered calls and puts. These strategies carry a higher risk of capital loss and may not be suitable for all clients.

Important Disclosure

Past performance is not indicative of future results. Investing involves substantial risk, and clients should be prepared to bear the risk of loss, including possible loss of principal.

Item 9 – Disciplinary Information
Neither She Wealth Advisors, LLC nor any of its management persons have ever been involved in any criminal or civil actions, administrative proceedings, or proceedings before a self-regulatory organization (SRO) such as FINRA or the SEC.

We have never been the subject of any arbitration claim alleging damages in connection with investment advisory services or any other business activities.

No management person has been the subject of any bankruptcy petition, nor have there been any other regulatory, legal, or disciplinary events that are material to a client's or prospective client's evaluation of our firm or its personnel.

Item 10 – Other Financial Industry Activities and Affiliations

Broker-Dealer Status (10.A):
Neither She Wealth Advisors, LLC nor any of its management persons are registered, or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

Futures/Commodities Affiliations (10.B):
Neither She Wealth Advisors, LLC nor any of its management persons are registered, or have an application pending to register, as a futures commission merchant, commodity pool operator, commodity trading advisor, or an associated person of any of the foregoing entities.

Material Relationships or Affiliations (10.C):
At this time, She Wealth Advisors, LLC and its management persons have no other material relationships or arrangements that would be material to our advisory business or clients.

Other Advisers and Financial Planning Firms (10.D):
From time to time, She Wealth Advisors may recommend or refer clients to third-party investment advisers or financial planning firms for services outside the scope of our direct offerings. Before recommending or selecting another adviser or planner, we confirm that the firm is properly licensed or registered as an investment adviser. Please note that firms providing only financial planning services are also required to be registered investment advisers.

Clients will be informed in writing prior to engaging any third-party adviser or planner, and any solicitor or referral fees will be disclosed at that time. She Wealth Advisors does not share in planning revenue unless a solicitor agreement is in place, in which case the arrangement will be disclosed. We only recommend professionals we believe to be competent, reputable, and client-focused.

Other Business Activities:
Vanessa Friedman's outside business activities do not impair her ability to meet her fiduciary obligations to advisory clients. She devotes sufficient time and resources to ensure that her advisory duties are performed diligently.

No Proprietary Products or Insurance Affiliations:
We do not offer proprietary investment products or receive revenue from any affiliated funds. Neither She Wealth Advisors nor its supervised persons are licensed to sell insurance or affiliated with any insurance companies.

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

Code of Ethics
She Wealth Advisors, LLC has adopted a Code of Ethics that all supervised persons are required to follow. Core principles include:

- Fiduciary Duty: We must always act in the best interests of our clients.
- Confidentiality: We maintain strict confidentiality of client information except where disclosure is required by law.

- Insider Trading: Supervised persons are prohibited from trading on material non-public information.

A complete copy of our Code of Ethics is available to any client or prospective client upon request.

Participation or Interest in Client Transactions
Neither She Wealth Advisors, LLC nor any related person recommends securities to clients, or buys or sells for client accounts, securities in which we or a related person have a material financial interest.

Personal Trading Practices
She Wealth Advisors, LLC and its related persons may buy or sell the same securities (or related securities, such as options or futures) that we also recommend to clients. This may create a potential conflict of interest, particularly if personal trades are executed ahead of client trades (commonly referred to as “front-running”).

To mitigate this conflict, we maintain and enforce a Code of Ethics that includes pre-clearance procedures, trade monitoring, and policies requiring supervised persons to place client interests ahead of their own. We do not trade against client positions and take steps to ensure that personal trades do not disadvantage client accounts.

Additionally, any securities transactions for related persons are typically executed after client trades have been placed, when feasible. Exceptions may apply only in situations where trades are batched and allocated fairly across accounts.

Prohibited or Limited Practices

- Proprietary Trading: We do not trade against client accounts or operate a proprietary trading desk.

- Cross-Trading: We do not execute cross-trades between client accounts.

- Principal Transactions: We do not act as a principal in any transaction involving client accounts.

- Margin & Securities Lending: We may recommend margin if authorized by the client. Clients pay margin interest to the custodian; we do not receive any portion of such interest.

Item 12 – Brokerage Practices

Selection of Custodians (12.A.(1))
We generally recommend clients use Charles Schwab & Co. (“Schwab”) as custodian for

brokerage and custody of client accounts. Clients are not required to use Schwab, and they may request another custodian.

She Wealth Advisors may also receive an economic benefit from Schwab in the form of support products and services it makes available to us and other independent advisers whose clients maintain accounts at Schwab. These products and services may include research, brokerage, technology, compliance, and administrative support. The availability of these services benefits She Wealth Advisors but may create a potential conflict of interest, as we have an incentive to recommend Schwab based on the services provided rather than the client's best interest.

We mitigate this conflict by recommending custodians based on service quality, technology, reporting, and competitive trading costs, not on the availability of these products and services. The availability of Schwab's services is not conditioned on directing clients to invest in any specific securities.

Custody
She Wealth does not take custody of client accounts at any time. Custody of client accounts is held primarily at the Custodian. Clients will receive account statements from the custodian and should carefully review those statements.

Best Execution
We seek best execution for all client trades by routing orders to national exchanges, ECNs, or market makers through the custodian's platform.
We periodically review execution quality by comparing realized trade prices to NBBO (National Best Bid and Offer).

Soft-Dollar Arrangements
She Wealth Advisors may receive an economic benefit from Schwab in the form of support products and services it makes available to us and other independent advisers whose clients maintain accounts at Schwab. These products and services may include research, brokerage, technology, compliance, and administrative support. The availability of these services benefits She Wealth Advisors but may create a potential conflict of interest, as we have an incentive to recommend Schwab based on the services provided rather than the client's best interest.

We do not enter into formal "soft dollar" arrangements where research is provided in exchange for directing brokerage transactions. Any third-party research or services we use that are not covered by Schwab's platform are paid directly by She Wealth Advisors.

Aggregation and Allocation of Trades
Where appropriate, we aggregate ("block") trades for multiple client accounts to achieve more efficient execution.
Trades are allocated pro-rata based on account size or other fair allocation methods if block orders are only partially filled.

Client-Directed Brokerage
If a client directs us to use a specific broker, we will attempt to honor that request but cannot

guarantee best execution or lowest costs.
Clients who direct brokerage may experience higher trading costs, and we cannot negotiate volume discounts on their behalf.

Custody of Cryptocurrency Assets
She Wealth Advisors does not take possession of client cryptocurrency or maintain access to private keys. All cryptocurrency exposure must be through exchange-traded products or futures contracts held at qualified, SEC- or CFTC-regulated custodians (e.g., Charles Schwab for ETFs, CME clearing for futures). We do not custody crypto directly and do not recommend custodians that are not registered U.S. financial institutions. Neither She Wealth Advisors nor its representatives maintain access to private keys or digital wallets; custody remains solely with the qualified custodian.

Item 13 – Review of Accounts

Account Reviews and Reviewers
Ongoing Monitoring: Discretionary accounts are reviewed at least monthly by Vanessa Friedman, Chief Investment Officer, and whenever there is a material market event or a client-triggered life event.
Review Triggers: Significant economic shifts, corporate earnings events, or client changes (e.g., retirement, inheritance) prompt an out-of-cycle review.

Financial Planning Reviews
If you engage with a third-party planning firm, they will recommend an annual or biannual update to your plan (fees paid directly to them).
She Wealth does not provide ongoing updates to the third-party plan but can implement recommendations under our standard AUM fees if you engage us.

Statements and Reports
For our asset management services, you are provided with transaction confirmation notices and regular quarterly account statements directly from your qualified custodian.

Item 14 – Client Referrals and Other Compensation
She Wealth Advisors, LLC does not pay referral fees to any third parties for soliciting or referring clients to the firm.

However, She Wealth may receive referral fees from third-party professionals, including attorneys, tax professionals, insurance agents, or unaffiliated financial planners or investment advisers, when a client engages those professionals following a referral. These arrangements are governed by written agreements and disclosed to the client at the time of referral. Clients are never obligated to use any professional we recommend. This compensation may present a conflict of interest, which we mitigate by referring only to professionals we believe are competent, reputable, and client-focused.

The only other compensation She Wealth receives from advisory services is the fees described in Item 5 of this Brochure.

She Wealth may also receive an economic benefit from Schwab in the form of support products and services it makes available to us and other independent advisers whose clients maintain accounts at Schwab. These services, and their potential conflicts of interest, are discussed in Item 12 – Brokerage Practices. The availability of Schwab's services is not conditioned on She Wealth directing clients to invest in any specific securities.

Item 15 – Custody

She Wealth Advisors, LLC is deemed to have custody of client assets solely because advisory fees are deducted directly from client investment accounts held at a qualified custodian, such as Charles Schwab. Clients provide written authorization for this fee deduction through the advisory agreement and account opening documentation. She Wealth Advisors does not otherwise maintain custody of client funds or securities.

Clients receive regular account statements directly from the qualified custodian, which reflect all transactions, including the deduction of advisory fees. We urge clients to carefully compare the account statements they receive from the custodian with the invoices they receive from us, to ensure accuracy and consistency.

We follow the safeguards outlined under California's constructive custody exemption, California Code of Regulations (CCR) § 260.237(b)(3), which include:

- Custody exists solely because we are authorized to deduct fees from client accounts.
- We obtain written authorization from each client to deduct fees directly from their account with the qualified custodian.
- Each time a fee is deducted:
  - We provide the qualified custodian with an invoice stating the specific amount to be withdrawn; and
  - We send an itemized invoice to the client that includes the formula used to calculate the fee, the account value on which the fee was based, and the specific time period covered.

Item 16 – Investment Discretion

She Wealth provides discretionary management for accounts under a signed Investment Advisory Agreement. Discretionary authority means:

- We decide what securities to buy or sell.
- We decide the quantity of securities to trade.

• We implement trades without seeking your prior approval for each transaction, provided we respect any restrictions you impose (e.g., no tobacco stocks, ESG-focused mandates).

You may impose reasonable restrictions on investing in certain securities or types of securities. We will document any unusual constraints in writing. We cannot guarantee complete compliance if a restriction prevents effective portfolio management.

Item 17 – Voting Client Securities

She Wealth does not vote proxies on behalf of clients. We believe proxies may present conflicts of interest. Therefore:

• You retain exclusive responsibility for voting proxies.
• We will forward proxy materials to you promptly upon receipt.
• We may provide general voting guidance upon request, but the final vote is always yours.

If you have questions about a particular solicitation or proxy material, you may contact us at 818.517.1725 or vanessa@she-wealth.com

Item 18 – Financial Information

Balance Sheet

She Wealth Advisors, LLC does not require or solicit prepayment of more than $500 in fees per client, six months or more in advance. Therefore, we are not required to include a balance sheet with this brochure.

Financial Condition

She Wealth Advisors, LLC maintains at least the minimum financial net worth as required under California Code of Regulations Section 260.237.2(a), which is $10,000. We strive to maintain a net worth of at least $12,000 to avoid the need for monthly reporting. Our most recent balance sheet, prepared in accordance with GAAP, includes the following disclosure: “Retained earnings of $31,205 reflects prior net income from business activity unrelated to investment advisory services, carried over from predecessor business structure under the same EIN.”

We are not aware of any financial condition that is reasonably likely to impair our ability to meet our contractual commitments to clients.

She Wealth Advisors has not been the subject of a bankruptcy petition. We file financial disclosure statements as required with the California Department of Financial Protection and Innovation.

Item 19 – Requirements for State-Registered Advisers

19.A Principal Executive Officers and Management Persons

The principal executive officer and management person of She Wealth Advisors, LLC is:

- Vanessa Friedman – Chief Investment Officer and Managing Member. She holds a degree in Kinesiology, Exercise Science from California State University of Northridge and has over 20 years of experience as an entrepreneur, educator, and active trader. Her business and educational background are described in more detail in Part 2B of this Form ADV.

19.B Other Business Activities
She Wealth Advisors, LLC is also engaged in providing coaching and educational services related to trading techniques, risk management, and financial literacy. These services are described in Item 4 of this brochure and are billed separately on an hourly or project basis, as disclosed in Item 5. Coaching is educational in nature and does not involve portfolio management or securities recommendations.

19.C Performance-Based Fees
Neither She Wealth Advisors, LLC nor any of its supervised persons are compensated for advisory services with performance-based fees. All fees are charged on an asset-under-management, fixed-fee, or hourly basis, as described in Item 5.

19.D Legal or Disciplinary Events
Neither She Wealth Advisors, LLC nor any of its management persons have ever been involved in any arbitration claim, civil proceeding, self-regulatory organization proceeding, or administrative proceeding. There are no legal or disciplinary events to disclose that would be material to a client’s evaluation of the firm or its management.

19.E Relationships with Issuers of Securities
Neither She Wealth Advisors, LLC nor any of its management persons have any relationship or arrangement with the issuer of a security. We do not receive compensation, maintain control positions, or serve in any capacity (such as officer, director, or consultant) with any issuer of securities.

Material Conflicts of Interest Disclosure

She Wealth Advisors, LLC seeks to avoid or mitigate conflicts of interest wherever possible. If a material conflict of interest does arise, we will fully disclose it to clients in writing before entering into, or upon renewal of, any advisory agreement, consistent with California Code of Regulations § 260.238(k). These disclosures are intended to ensure clients are aware of any circumstances that could reasonably be expected to impair the rendering of unbiased and objective advice. Any material conflicts of interest have been disclosed.

Business Continuity Plan

She Wealth Advisors, LLC has adopted a written Business Continuity Plan (BCP) designed to address the possibility of a significant business disruption. This includes contingencies for natural disasters, cyberattacks, power outages, and the death or incapacitation of the principal adviser. The BCP outlines procedures for safeguarding client information, maintaining access to key systems, and ensuring continuity of communication with clients. Our plan is reviewed at least annually and updated as necessary. Clients may request a summary of our BCP at any time.

Acknowledgment
By signing the Investment Advisory Agreement, you acknowledge that you have received and read this ADV Part 2A Brochure, and that you understand the services we offer, our fee structure, and all disclosures contained herein.

Contact Information
If you have questions about this brochure or any aspect of our services, please contact:

Vanessa Friedman
Chief Investment Officer
She Wealth Advisors, LLC
Phone: (818) 517-1725
Email: vanessa@she-wealth.com

Thank you for considering She Wealth Advisors for your investment and educational needs. We look forward to helping you achieve your financial goals.