

**ITEM 1 – COVER PAGE**



Combined

Firm Brochure (2A) & Supplement (2B)

Worry-In-Order, LLC  
Investment Advisor  
Registered TM of Shaun Nima Christiansen, MPA

**Designated Compliance Contact**

Shaun Nima Christiansen, MPA  
Investment Advisor Representative  
503-468-8666  
[compliance@worryinorder.com](mailto:compliance@worryinorder.com)

THIS BROCHURE PROVIDES INFORMATION ABOUT THE QUALIFICATIONS AND BUSINESS PRACTICES OF WORRY-IN-ORDER, LLC REGISTERED INVESTMENT ADVISOR. IF YOU HAVE ANY QUESTIONS ABOUT THE CONTENTS OF THIS BROCHURE, PLEASE CONTACT US AT 503-468-8666 OR EMAIL [COMPLIANCE@WORRYINORDER.COM](mailto:COMPLIANCE@WORRYINORDER.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. ADDITIONAL FORMATION ABOUT WORRY-IN-ORDER, LLC IS AVAILABLE ON THE SEC'S WEBSITE AT [WWW.ADVISERINFO.SEC.GOV](http://WWW.ADVISERINFO.SEC.GOV).

REGISTRATION AS AN INVESTMENT ADVISOR (IA) OR INVESTMENT ADVISOR REPRESENTATIVE (IAR) IMPLIES ONLY MINIMUM REGISTRATION REQUIREMENTS HAVE BEEN FILED WITH THE SEC AND DOES NOT IMPLY OR ENDORSE ANY LEVEL OF SKILL OR TRAINING BEYOND SATISFACTORY COMPLETION OF THE NASAA-SPONSORED SERIES 65 QUALIFYING EXAM.

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### ITEM 3 - MATERIAL CHANGES

As of March 1, 2026, there have been no material changes to this document.

### ITEM 4 – ADVISORY BUSINESS

SHAUN NIMA CHRISTIANEN, MPA (SNC)

Shaun Nima Christiansen (interchangeable “Worry-In-Order”) is an Oregon-domiciled Investment Advisor Representative (IAR) of Worry-In-Order, LLC, Registered Investment Advisor (IA). Shaun Nima Christiansen is the sole shareholder and Managing Member of Worry-In-Order, LLC; of which “Worry-In-Order” is a registered trademark.

Shaun Nima Christiansen, born Oregon 1983, has the following education and business history:

- Education

Masters Public Administration – University of Oregon (2009)  
B.S. Sociology & Legal History – Western Oregon University (2006)  
Lake Oswego High School class of 2001

- Business History

Worry-In-Order, LLC Investment Advisor – Founder / Investment Advisor  
Portland Festival Symphony -- President of the Board of Directors (Sitting)  
Pacific Advisors of Oregon – Investment Advisor Representative (retired 2025)  
Mass Mutual of Oregon – Managing Associate (retired 2016)  
Northwestern Mutual – Registered Representative (retired 2014)  
Congress of the United States of America – Congressional Intern (Washington, DC) (2009)

More Information on Shaun Nima Christiansen’s education and business history can be found at:

<https://www.linkedin.com/in/worryinorder/>

### WORRY-IN-ORDER

Worry-In-Order, LLC (herein “Worry-In-Order”) is an Oregon domiciled Investment Advisor firm, first registered in the year 2026, that offers discretionary advice and portfolio management services of securities portfolios for a fee calculated as a percentage of assets under management. Worry-In-Order contracts with Betterment Holdings, LLC and its affiliates (collectively “Betterment”) to provide investment related services to our firm; these services include but are not limited to sub-advisory services, asset custody, brokerage and clearing services.

## BETTERMENT

Betterment is an SEC Registered Investment Advisor, serving as asset custodian and sub-advisory service provider to Worry-In-Order investment advisory clients. MTG, LLC doing business as Betterment, is a registered broker-dealer and member of FINRA and SIPC, serves as broker-dealer and custodian. Accounts are governed by two separate and distinct advisory agreements - between client and Worry-In-Order & client and Betterment.

## WORRY-IN-ORDER / BETTERMENT RELATIONSHIP

Worry-In-Order, LLC & Betterment are not “related persons” and are separate and distinct entities. Betterment is primarily a custodian and broker dealer responsible for the execution of securities transactions and does not independently evaluate whether securities within a portfolio are suitable for an investor’s financial situation. Worry-In-Order, and not Betterment, is responsible for portfolio construction including securities selection and ensuring on an ongoing basis that a portfolio’s holdings remain within a client’s stated investment objectives and risk tolerance.

## TAILORED SERVICES & ACCOUNT RESTRICTIONS

Worry-In-Order advises on investment accounts that can contain securities such as non-qualified individual accounts, ERISA qualified investment accounts such Individual Retirement Accounts (IRAs), ROTH IRA, SEP IRA, 401(k) as well as high yield cash accounts, trust accounts and other similar accounts capable of containing securities.

## INVESTMENT RESTRICTIONS

Worry-In-Order provides portfolio advisory services on a discretionary basis only and does not allow clients to restrict specific securities or otherwise influence investment making decisions other than to approve or disapprove of the use of crypto currency ETF as an investable asset class.

As an alternative to allowing clients to restrict specific securities, Worry-In-Order offers access to Environmental, Social, Governance (ESG) ETFs. ESG investing utilizes a non-financial framework that considers a security issuer’s ethical and business practices in addition to financial performance.

## CRYPTO CURRENCY

Worry-In-Order does not offer direct access to crypto currency however, Worry-In-Order clients have access to crypto currency exposure via crypto currency invested ETFs.

## ASSETS UNDER MANAGEMENT

Worry-In-Order Investment Advisor was established in the year 2026 and has no reportable AUM until the end of the 2027 fiscal year.

## **ITEM 5 – FEES & COMPENSATION**

### WRAP FEE PROGRAM PARTICIPATION

Worry-In-Order provides its advisory services through a “wrap” fee program administered directly by our partner custodian Betterment. “Wrap” fee refers to a singular fee that bundles (or wraps) the cost of the following services instead of charging a spread or commission per trade.

1. Worry-In-Order Advisory Services  
The cost of portfolio construction, advice, monitoring and ongoing discretionary management as outlined in the client engagement agreement.
2. Betterment Custodial Fees  
The cost to custody assets and the administration of broker/dealer expenses associated with the buying and selling of securities.

Worry-In-Order retains a negotiable fee-range of 0.25% to 1.5% calculated as a percentage of a client’s assets under management, excluding assets held in cash reserves. Worry-In-Order retains the right to assess each client a different fee based on circumstances specific to each client such as the expected intensity of account maintenance and management. Each client’s specific fee will be disclosed to them in a separate agreement.

Betterment retains a custodial fee range of 0.12% to 0.20% calculated as a percentage of assets custodied; excluding assets held in cash reserves. The fee retention rate of Worry-In-Order advised assets is 0.20%. Betterment deducts this “wrap” fee directly from client assets quarterly, in arrears, and remits directly to Worry-In-Order our portion of the assessed fee.

Additional disclosures on fees and compensation are described in Betterment Form ADV Part 2A and Wrap Fee Program Brochure.

## **ITEM 6 – PERFORMANCE BASED FEES**

### PERFORMANCE BASED-FEES AND SIDE BY SIDE MANAGEMENT

Worry-In-Order does not charge performance-based fees and does not offer side-by-side management.

## **ITEM 7 – TYPES OF CLIENTS**

### WHO WORRY-IN-ORDER SERVES

Worry-In-Order provides its financial planning and investment advisory services to retail investors; including and not limited to natural born persons, trusts, employer sponsored plans including participants, and other legal entities; who are residents of the state of Oregon, or a state with which Worry-In-Order has no more than 5 current clients, or a state that Worry-In-Order subsequently registers within.

## ACCOUNT BALANCE REQUIREMENTS

Worry-In-Order does not maintain a minimum account balance for traditional securities portfolio management; however crypto custodian Gemini maintains a variable minimum order size requirement for crypto transactions; minimum order size fluctuates based on market conditions.

For Information on how Worry-In-Order accounts are custodied, including information on Crypto custodian Gemini, please reference Item -15 (Custody of Assets) of this firm brochure.

## **ITEM 8 – METHODS OF ANALYSIS, INVESTMENT STRATEGIES & RISK OF LOSS**

### INVESTMENT MANIFESTO

Worry-In-Order specializes in providing discretionary investment advice and portfolio management services to retail investors on securities portfolios primarily containing mutual funds, ETFs and other financial instruments deemed to be tradeable securities. Worry-In-Order is licensed and registered to provide advice at the portfolio level and not the individual security level. Worry-In-Order develops an individual investment plan for each client that considers factors such as individual goals, needs, life-stage, time horizon, financial experience and tolerance for investment related risk and then constructs and continually monitors factor appropriate investment portfolios.

### FINANCIAL INSTRUMENTS

Worry-In-Order designed portfolios primarily consist of Mutual Funds & ETFs that are highly likely to contain the following financial instruments:

1. Stocks
2. Bonds
3. Certificates of Deposit
4. Money Market Instruments
5. Mutual Funds
6. Real Estate Investments Trusts (REITs)
7. Exchange Traded Funds (ETFs)
8. Crypto ETFs
9. Other instruments deemed to be tradeable securities

### INVESTMENT STRATEGIES

Worry-In-Order deploys a combination of two investment management strategies in its attempt to earn portfolio gains - passive and tactical investment management. During the risk tolerance assessment stage of developing an investment plan Worry-In-Order will communicate the pros, cons and risks of both strategies. Worry-In-Order and client will collaboratively agree upon a "strategy allocation" -the ratio of client's overall assets under management to which investment strategy is applied.

**“Strategy allocation” is not the same as asset allocation which refers to the ratio of equity to fixed income within a portfolio.**

For example, a "70/30" **strategy allocation** means that 70% of a clients assets under management will be managed using a Modern Portfolio Theory (MPT) based passive strategy that seeks market Beta - ( $\beta$ ) - via a highly diversified portfolio; The remaining 30% will be managed in a more fundamentalist based tactical strategy that seeks market Alpha through careful considerations to current market conditions, world news and events that influence market prices in the short term.

Tactical investment management seeks to find market Alpha - ( $\alpha$ )- investment returns that beat the market at large - while passive investment management seeks to find market Beta ( $\beta$ )- investment returns that mirror the market at large. Generally, Worry-In-Order applies passive management strategies to the majority of a client’s assets and tactical management strategies to the minority of client’s assets. Worry-In-Order regards tactical investment strategies as a hedge against inflationary pressure.

**PASSIVE INVESTMENT MANAGEMENT (seeking  $\beta$ )**

Passive investment management deploys a long-term minded buy and hold strategy that seeks to gain investment returns consistent with the market at large over a specified period regardless of current market conditions. Passive investment management emphasizes long-term market participation and places less consideration on day-to-day market volatility.

**TACTICAL INVESTMENT MANAGEMENT (seeking  $\alpha$ )**

Tactical investment management deploys a more active or "tactical" approach to earning portfolio gains by trying to capitalize on short-term economic trends and market indicators with active day-to-day or week-to-week trading.

Tactical management involves a higher level of risk and requires a more hands-on and time-consuming approach to portfolio management.

Clients who prefer a more tactical strategy may be assessed a slightly higher fee; however, Worry-In-Order's "wrap" fee structure may favor a client who prefers a more tactical management strategy because the custodial & broker /dealer fee is inclusive of all trades and transactions -whereas if a high trade volume tactical investment strategy is deployed in a brokerage account where the investor pays a commission per trade then the brokerage cost per trade could erode or off-set portfolio earnings.

**MODERN PORTFOLIO THEORY INFORMED METHODS OF ANALYSIS**

Worry-In-Order's investment decision making process is primarily informed by Modern Portfolio Theory (MPT). MPT holds that investors are rational and risk averse actors who will only accept more investment risk in exchange for more return on investment. MPT statistical models attempt to predict the optimal risk to return ratios, graphically representing the acceptable level of risk in relation to a given return on investment on a topographical arc known as an "efficient frontier" that defines an investment portfolio's efficiency and informs Worry-In-Order investment decision making.

## ASSET ALLOCATION

Worry-In-Order will build an investment plan for each client that identifies an efficient frontier of risk related to expected return and constructs an appropriately asset allocated portfolio - the specific mix of equity to fixed income (stocks to bonds) invested. Maintaining a highly diversified portfolio is a core tenet of Modern Portfolio Theory and a major risk reduction strategy.

## ASSET ALLOCATION REBALANCING

Worry-In-Order routinely monitors our client accounts for asset allocation "drift" - when due to routine market volatility a portfolio is identified as having drifted from its original allocation - or having deviated off the efficient frontier. Each Client's account is guaranteed a monthly review by Worry-In-Order.

## TAX LOSS HARVESTING

Tax Loss Harvesting is an investment and tax planning strategy that seeks to reduce client tax liability by selling negative performing investments and using the accompanying losses to offset taxable gains from positive performing investments.

If an investment is sold at a loss and then the same investment or a substantially identical investment is repurchased within 30 days before or after the sale, then a disallowed "wash sale" has occurred and the investor must add the loss to the cost basis of the newly purchased investment, which means that the loss the associated with selling the investment for less than originally purchased cannot be claimed as a deduction for tax purposes.

Wash sales do not have occur intentionally and even an unintentional wash sale will lead to permanent disallowed losses.

Worry-In-Order accounts are algorithmically monitored to reduce the potential for disallowed "wash sales" and permanently disallowed losses by seeking to avoid sales in asset classes where there is overlap between one or more securities inside a client portfolio.

## TAX COORDINATION

Tax-Coordinated Portfolios deploy a long-term asset-allocation strategy that distributes assets unevenly across multiple account types based on the varying return profiles of each asset while separately considering the potential for capital appreciation and dividend yield. Intentional asset location seeks to place assets with higher expected returns into tax-advantaged accounts and produce long term tax savings and investment efficiency.

## DOLLAR COST AVERAGING

Dollar cost averaging (DCA) is an investment strategy where an investor makes additional portfolio contributions at regular intervals, regardless of the current market conditions. By doing so, the investor buys more shares when the price is low and fewer shares when the price is high, thereby averaging the cost of their investment over time.

The goal of dollar cost averaging is to reduce the impact of market volatility on the overall investment by buying at various price points over time. This strategy can be particularly useful for long-term investments, such as retirement savings, where the investor is less concerned about short-term fluctuations in the market.

#### RISK OF LOSS

Please be advised that investing in securities involves risk, including the possible loss of principal. No investment strategy can guarantee a profit or protect against loss in a declining market. Past performance is not indicative of future results. The value of investments and the income derived from them may fluctuate due to market and currency movements and investors may not get back the amount originally invested. Investors should carefully consider their investment objectives, risks tolerance, financial situation, and other relevant circumstances before investing.

Managing risk is a critical part of Worry-In-Order investment management. We work closely with our clients to understand their risk tolerance, investment objectives, and financial situation, and to develop a customized investment strategy that aligns with their goals. Please note that while we take steps to manage risk, investing always carries inherent risks, and no investment strategy can guarantee a profit or protect against a loss.

#### **ITEM 9 - SECURITIES INDUSTRY DISCIPLINARY HISTORY**

##### SECURITIES INDUSTRY DISCIPLINARY HISTORY

Shaun Nima Christiansen has no securities industry disciplinary history, and he is not party to any legal events that are material to client evaluation of our advisory business.

#### **ITEM 10 - OTHER FINANCIAL INDUSTRY ACTIVITIES & RELATED CONFLICT OF INTEREST**

##### INSURANCE BASED OUTSIDE BUSINESS ACTIVITY

In addition to acting as an investment adviser Worry-In-Order is an Oregon resident insurance line life/health producer. Worry-In-Order offers for sale life, disability income and long-term care Insurances as well as fixed income annuities as part of its wholistic financial planning offerings. Oregon resident Insurance Produce license no. 16277480; Washington producer license no. 791958. License information can be confirmed online at [www.naic.org](http://www.naic.org).

Because Worry-In-Order is paid a commission for the sale of insurance products that are separate and distinct from the advisory fee described in this document, a potential for a conflict of interest exists. Worry-In-Order mitigates potential for conflict of interest by:

- Disclosing to clients all financial industry activities and affiliations and their corresponding compensation structure.

- Disclosing to clients the difference between the fiduciary standard maintained in the Investment Advisor capacity versus the suitability standard maintained in the Insurance Producer capacity.
- Capturing and memorializing all relevant client financial data and maintaining compliance with Know Your Client (KYC) requirements.
- Making recommendations to clients that are in alignment with factors such life stage, risk exposures and balance sheet positions, among other commonly accepted factors of personal financial management.

#### OUTSIDE BUSINESS ACTIVITY

Shaun Nima Christiansen has been a member of the Portland Festival Symphony Board of Directors since 2017; President of the Board of Directors(2023-current). This business association reports no conflict of interest.

Worry-In-Order has no other reportable conflicts of interest.

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## ITEM 11- CODE OF ETHICS, INTEREST IN CLIENT TRANSACTIONS & PERSONAL TRADING

### PREAMBLE TO THE CODE OF ETHICS

In order to promote transparency and ethical behavior in an investment advisor's business operations the SEC has issued rule 204- A-1 which requires investment advisors registered under the Investment Advisers Act of 1940 to establish a written code of ethics and provide a copy to those who request it. Worry-In-Order maintains the following written code of ethics pursuant to SEC rule 204-A-1:

#### WORRY-IN-ORDER CODE OF ETHICS

*Worry-In-Order commits to behave and operate with the following principles embedded in our business affairs:*

- **FIDUCIARY DUTY**  
*Worry-In-Order is a fiduciary investment advisor that always places the client's best interests and needs first & foremost and never considers Worry-In-Order interests in relation to our investment decision making process.*
- **COMPLIANCE**  
*Worry-In-Order complies with all applicable laws, rules, and regulations with the intent of providing investors with confidence in the legitimacy of their investment decisions.*
- **CONFIDENTIALITY**  
*Worry-In-Order pledges the confidentiality of our client's personal information and does not disclose any private information to anyone, except as required by law or authorized by the client. Worry-In-Order maintains an internal written policy and procedures manual that defines the procedures for handling confidential information.*
- **FAIR DEALING**  
*Worry-In-Order operates honestly and does not engage in any business practice that may be considered manipulative, deceptive, or fraudulent. Worry-In-Order has established procedures to monitor and prevent any conflicts of interest that may arise and commits disclosing any such conflicts to our clients in a timely and transparent manner through updating this Firm Brochure.*
- **DISCLOSURE**  
*Worry-In-Order provides timely disclosure regarding our advisory operations. Our disclosures are well organized, transparent, and written in plain English in a tone and voice that we believe our clients will understand. All Worry-In-Order policies and disclosures can be viewed in the Legal Directory of [www.worryinorder.com](http://www.worryinorder.com).*
- **PERSONAL SECURITIES TRANSACTIONS**  
*Worry-In-Order commits to blind trading of our personal securities, meaning we do not know the identity of purchasers with whom we sell our personal securities. Our intent is that personal trading is conducted with other market participants, and we do not knowingly and intentionally transact personal business with our clients. We expressly state that we will never knowingly act as a seller in our account and as a buyer in a client account; or vice versa, as a seller in a client account and as a buyer in our account.*
- **CONTINUING EDUCATION**  
*Worry-In-Order strives for lifetime learning and continual professional development. We commit to exceeding professional competence by staying informed and knowledgeable about ever-evolving laws, regulation and industry best practices.*

END CODE OF ETHICS

By adopting and adhering to this code of ethics, we are committed to upholding the highest standards of ethical conduct and professionalism, and to protecting the interests of our clients in compliance with SEC Rule 204A-1. If you would like a free copy of our code of ethics please contact [compliance@worryinorder.com](mailto:compliance@worryinorder.com).

## **ITEM 12 - BROKERAGE PRACTICES**

### **BROKERAGE POLICY**

Worry-In-Order does not allow our clientele to "direct brokerage" by choosing their own custodian and broker/dealer; Worry-In-Order advisory services are only available in combination with Betterment as client agreed upon custodian and broker/dealer.

Worry-In-Order does not charge commissions for its services; Worry-In-Order participates in a Betterment administered "wrap fee" program that assesses a fee calculated as a percentage of assets under management. Please reference Item-5 of this firm brochure for specific information on how Worry-In-Order is compensated.

The considerations that went into the selection of Betterment as the custodian and broker/dealer of Worry-In-Order services are covered in Item-14 of this firm brochure (Client Referrals and Other Compensation).

### **ACCOUNTS HELD IN THE NAME OF WORRY-IN-ORDER**

Worry-In-Order does not maintain accounts at Betterment held in the name of Worry-In-Order, LLC; however, Shaun Nima Christiansen does maintain personal accounts held in his name at Betterment. Shaun Nima Christiansen does not maintain investment accounts at institutions other than Betterment. All accounts containing, or capable of containing, securities registered in the name of either Worry-In-Order, LLC or Shaun Nima Christiansen, are maintained at Betterment.

Shaun Nima Christiansen maintains the following types of Betterment custodied personal accounts:

- Checking Account
- High Yield Cash Reserve Account
- Non-Qualified Individual Investment Account
- ERISA Qualified SEP IRA Account

### **TRADING IN PERSONAL ACCOUNTS**

Shaun Nima Christiansen regularly trades in his own account the same securities as Worry-In-Order advises its clients. This trading is blind, meaning Shaun Nima Christiansen does not know who purchases securities offered for sale. To the best of his knowledge and intent this trading is conducted with other market participants; and Shaun Nima Christiansen does not knowingly and intentionally transact personal business with his clients.

Shaun Nima Christiansen expressly states that he will never knowingly act as a seller in his account and as a buyer in a client account; or vice versa, as a seller in a client account and as a buyer in his account. The prices Shaun Nima Christiansen receives for his trades are the same as the prices his clients receive.

## **ITEM 13 - REVIEW OF ACCOUNTS**

### **WHO REVIEWS YOUR ACCOUNTS**

Shaun Nima Christiansen is the only Worry-In-Order representative who has access to client accounts and personal information.

### **SCHEDULED ACCOUNT REVIEW**

Worry-In-Order reviews advisory accounts on at least a monthly basis. The purpose of these reviews is to ensure client accounts continue to be in line with their initial investment objectives, remain appropriately asset-allocated along their efficient frontier, and for other routine and common account maintenance purposes.

### **CONDITIONS THAT TRIGGER AN ACCOUNT REVIEW**

Worry-In-Order may review accounts more frequently than the monthly scheduled account review. Factors that may trigger an off-cycle account review are major market or economic events, major political events, major international events, etc. Client life events such as the birth of a child, loss of employment, etc. may also trigger an account review. These off-cycle account reviews are primarily informed by tactical investment strategy opportunities.

### **HOW WE CONDUCT ACCOUNT REPORTS**

Quarterly account statements are provided by and directly accessed through custodian Betterment, LLC.

Worry-In-Order does not guarantee to provide written reports or physical paper and ink reporting documents to its clients, but many do so at Worry-In-Order discretion. Worry-In-Order delivers its services as remotely and as digitally as possible - providing client communications over the phone, remote hosted meeting services, email and other digital forms of communications.

Most commonly, Worry-In-Order delivers annual verbal reports to clients over a remote-hosted meeting interface such as Microsoft Teams.

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## **ITEM 14 - CLIENT REFERRALS & OTHER COMPENSATION**

### COMPENSATION WE RECEIVE FOR CLIENT REFERRALS

Access to Worry-In-Order Investment Advisory services require that our clients appoint Betterment as custodian and broker/dealer of their assets, creating a client referral from Worry-In-Order to Betterment. There is no direct link between Worry-In-Order's recommendation of Betterment as custodian and the investment advice we provide our clients, although we potentially receive economic benefits from Betterment that are typically not available to retail investors. These "soft dollar" benefits include but are not limited to:

- Access to an advisor dashboard to monitor and manage client accounts
- Investment research related tools, products &/or services
- Customer service and consulting not available to the general investing public
- Administration of the wrap fee program (fee collection and accounting)

These products or services assist us in administering client accounts and benefit us because we do not have to produce or purchase these services. The benefits Worry-In-Order receives from Betterment does not depend on a specific monetary amount of business Worry-In-Order transacts with Betterment.

Betterment does not offer a discount in Shaun Nima Christiansen's personally held Betterment accounts. Shaun Nima Christiansen's current custodial fee is 0.20%, the same as Betterment charges Worry-In-Order clients.

The receipt of economic benefits by our firm from Betterment creates an inherent potential conflict of interest, however, Worry-In-Order's fiduciary duty requires that at all-times the client's best interests are placed before Worry-In-Order's interests. Worry-In-Order declares that our selection of Betterment Securities as custodian and broker/dealer is in the best interests of our clients primarily because of the scope, quality, and price of Betterment services and not because of any additional service or assistance Betterment may offer us.

### COMPENSATION WE PAY FOR CLIENT REFERRALS

Worry-In-Order does not pay fees, commissions, trade or discount our services, or offer or provide any other form of compensation for the referral of clients to our firm.

## **ITEM 15 – CUSTODY OF ASSETS**

### **CUSTODY OF TRADITIONAL SECURITIES PORTFOLIOS**

Worry-In-Order contracts with Betterment to provide custody of client assets and to provide broker/dealer services related to the buying and selling of securities. As a condition of engaging Worry-In-Order for investment advisory services, clients must open a brokerage account with Betterment. Betterment is both a carrying and an introducing broker/dealer registered with FINRA and a member of the SIPC, whose primary purpose is to custody and service accounts on a discretionary basis.

Betterment Securities has entered into an agreement with Apex Clearing Corporation ("Apex"), pursuant to which Apex serves as the clearing broker. Betterment instructs Apex to clear and settle Betterment's wrap fee program transactions on an omnibus basis.

### **CUSTODY OF CRYPTO PORTFOLIOS**

Crypto ETF portfolios are custodied separately from traditional securities portfolios. Crypto assets are held in accounts with Gemini Trust Company LLC, a New York trust company subject to the regulations and standards set forth by the New York State Department of Financial Services (NYDFS) and New York Banking Law.

Crypto investing is available only to clients who 1) open an account with Gemini in their own name, and 2) agree to Gemini's independent terms and agreements, and 3) authorize Betterment to provide discretionary management of crypto accounts.

Crypto assets are not legal tender and are not backed by the United States of America Federal Reserve. Crypto assets are not subject to FDIC or SIPC protections. Gemini provides a monthly account statement directly to clients which should be carefully reviewed and compared to Betterment provided account statements; This audit is not a service that Worry-In-Order provides.

## **ITEM 16 – INVESTMENT DISCRETION**

### **DISCRETION TO TRANSACT TRADES**

Worry-In-Order manages client portfolios on a discretionary basis, pursuant to a separate investment advisory engagement agreement, signed by the client. By granting Worry-In-Order investment discretion, we are authorized to execute securities transactions on your behalf which include selecting which securities are to be bought and sold, the amounts to be bought and sold, and the prices at which the transactions will be executed.

Worry-In-Order's discretionary authority is limited by the fact that we cannot request or enact a withdrawal or deposit to or from a client's account- only the legal account holder can request or enact a withdrawal or deposit to or from their account.

**ITEM 17 – CLIENT PROXY VOTING**

VOTING CLIENT SECURITIES

Worry-In-Order does not accept proxy nor vote proxy for our clients; Worry-In-Order defers to Betterment's policy regarding proxy matters in Betterment custodied accounts.

**ITEM 18 – FINANCIAL DISCLOSURE**

WORRY-IN-ORDER FINANCIAL DISCLOSURE

Because 1) Worry-In-Order does not maintain custody of client assets; and 2) Worry-In-Order does not pre-collect management fees from clients, Worry-In-Order is not required to provide financial disclosure in this brochure.

Worry-In-Order, LLC and/or Shaun Nima Christiansen have never been subject to bankruptcy action and are not party to any legal events that are material to evaluation of our advisory business.

**ITEM 19 – STATE REGISTERED ADVISOR**

REQUIREMENTS FOR STATE-REGISTERED ADVISORS

It is disclosed that, on March 1, 2016, Shaun Nima Christiansen consented to a \$1,000 civil penalty for omission of a material fact relative to an application for insurance in violation of ORS 746.100; Department of Business & Consumer Services for the State of Oregon; Case No. INS-16-0059 (year 2014).

**END DOCUMENT**