

FORM ADV Uniform Application for Investment Adviser Registration

Part 2A: Investment Adviser Brochure

Item 1: Cover Page

**Worthy Asset Management LLC
d/b/a Worthy Financial Services**

CRD # 142462

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March 30, 2021

This brochure provides information about the qualifications and business practices of Worthy Asset Management LLC. If you have any questions about the contents of this brochure, please contact us at the phone number listed above.

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. Please note, where this brochure may use the terms "registered investment adviser" and/or "registered", registration itself does not imply a certain level of skill or training.

Additional information about the firm and its representatives is also available on the SEC's website at www.adviserinfo.sec.gov

Item 2: Material Changes

Due to a series of recent changes in securities regulation, investment advisers are now required to deliver disclosure information in this new narrative format ("Form ADV Part 2"). This brochure incorporates the same features and information provided previously within the Form ADV Part II.

Updates to the information contained within this brochure will be provided to clients on an immediate basis. This section will be updated to reflect such changes in a summary form. Should you have any questions related to these disclosures, please contact a firm representative at your convenience.

The material changes in this brochure from the last annual updating amendment of Worthy Asset Management LLC d/b/a Worthy Financial Services on 03/17/2021 are described below. Material changes relate to Worthy Asset Management LLC d/b/a Worthy Financial Services's policies, practices or conflicts of interests.

- Worthy Asset Management LLC d/b/a Worthy Financial Services has updated their Primary Office Address (Front Page).

Additional information about Worthy Asset Management LLC d/b/a Worthy Financial Services and its representatives is also available on the SEC's website at www.adviserinfo.sec.gov

Item 3: Table of Contents

Topic	Page #
Item 1: Cover Page	1
Item 2: Material Changes	2
Item 3: Table of Contents (this page).....	2
Item 4: Advisory Business	3
Item 5: Fees & Compensation	4
Item 6: Performance-based Fees and Side by Side Management	5
Item 7: Types of Clients	5
Item 8: Methods of Analysis, Investment Strategies, & Risk of Loss	6
Item 9: Disciplinary Information.....	7
Item 10: Other Financial Industry Activities & Affiliations	7
Item 11: Code of Ethics, Participation or Interest in Client Transactions, & Personal Trading.....	7
Item 12: Brokerage Practices	8
Item 13: Review of Accounts.....	9
Item 14: Client Referrals & Other Compensation.....	9
Item 15: C u s t o d y	9
Item 16: Investment Discretion	9
Item 17: Voting Client Securities.....	10
Item 18: Financial Information.....	10
Item 19: Requirements of State Registered Advisers.....	10
Item 20: Additional Information	10
Part 2B: Brochure Supplements (Items 1-6)	12-14

Item 4: Advisory Business

The principal owner of Worthy Asset Management LLC d/b/a Worthy Financial Services ("WAM") is Joseph E. Worthy. WAM provides fee-based discretionary investment advice and portfolio management services to individuals, high net-worth individuals, trusts, estates, charitable organizations, corporations and business entities. Alternately, WAM offers consulting services on a fixed fee basis. Prior to engaging the firm for services, clients are required to enter into a written agreement with the firm setting forth the terms and conditions in which WAM renders its services.

The firm's portfolio management services are provided in accordance with the client's investment objective and risk tolerance. Upon written request, a client may impose restrictions on investing in certain securities or types of securities. Consulting services are offered on a fixed fee basis, negotiable in advance, and dependent upon the scope and complexity of the engagement. Services offered may include comprehensive evaluation and recommendations in the following areas:

- Quarterly, Semi-Annual, or Annual Reviews
- Present Net-Worth Evaluation,
- Tax Liability Estimate
- Cash Flow and Budgeting
- Education Planning
- Retirement Analysis
- Qualified Retirement Plan Review
- Life Insurance Review
- Surviving Spouse Requirements
- Estate Analysis
- Financial Planning Review of Wills and Trusts (does not include tax or legal)
- Revised Analytical Reports
- Review of Buy/Sell Agreements and Other Consulting Services

To the extent specifically requested by a client, WAM may provide limited consultation services for a fee to its clients on investment and non-investment related matters. For example, WAM may render discretionary investment management services to clients relative to:

- (1) Variable life or annuity products that they may own, and/or
- (2) Their individual employer sponsored retirement plans.

In doing so, WAM either directs or recommends the allocation of client assets among the various mutual fund subdivisions that comprise the variable life or annuity product or the retirement plan. The client assets shall be maintained at either the specific insurance company that issued the variable life or annuity product which is owned by the client, or at the custodian designated by the sponsor of the client's retirement plan.

Assets Under Management: As of December 2020, WAM manages \$ 17,530,490 in 145 discretionary accounts.

Item 5: Fees and Compensation

Fees are charged quarterly in arrears based on the value of assets under management as of the last day of the calendar quarter. Management fees will be automatically debited from client accounts on a quarterly basis by the advisor at the qualified custodian of record. The custodian maintains possession of client assets in accordance with the client authorization in the Advisory Agreement ("Agreement").

The annual fee schedule for actively managed discretionary accounts is as follows:

Assets Under Management	Percentage (fee charged)
\$0-\$999,999	1.75%
\$1,000,000 - \$1,999,999	1.50%
\$2,000,000 - \$4,999,999	1.25%
\$5,000,000 - \$9,999,999	1.00%
Over \$10,000,000	Neg.

Fee Calculation: The fee is calculated as described above. Fees are charged in arrears (end of quarter) based upon a percentage of the total assets under management, including money market balances on the last trading day of each calendar quarter. The fee is not charged on the basis of a share of capital gains upon or capital appreciation of the funds or any portion of the funds of an advisory client (i.e. Performance fees).

In any partial calendar quarter, fees are pro-rated based on the number of days in which the account is open during the quarter. All securities and their values are determined by each mutual fund company, their designee, or other third party sources unless otherwise noted. Fee calculations are derived from these valuations.

Management fees are negotiable under certain circumstances, at the sole discretion of the firm. WAM's fee is separate and distinct from the custodian and execution fees. All commissions, custody, execution fees and other related costs or expenses charged by the qualified custodian and/or executing broker-dealer (or other financial institution(s) involved with the client account) are charged separately.

Such fees may include custodial fees, charges imposed directly by a mutual fund or exchange traded fund in the account, which shall be disclosed in the fund's prospectus (e.g., fund management fees and other fund expenses), deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. WAM does not receive any portion of these commissions, fees, and costs.

For planning clients, WAM offers its clients a fixed annual fee that is negotiated and payable in advance based on the scope of the proposed engagement. In general, the fixed fee may range from \$500 to \$10,000 depending on the complexity of the plan.

Termination of Advisory Relationship: The advisory agreement may be canceled at any time, by either party, for any reason upon receipt of written notice. Upon termination of an account, any prepaid and/or unearned fees will be promptly refunded. Similarly, any earned and/or unpaid fees will be due and payable. Clients retain the right to terminate the advisory agreement without penalty within five business days after entering into the agreement. The agreement shall remain non-transferable unless authorized by the client in writing.

Item 6: Performance-Based fees and Side-by-Side Management

WAM's investment advice does not extend to the management of Private Funds. The firm's offerings are limited to portfolio management on behalf of individuals, pension and profit sharing plans, trusts, estates, charitable organizations, corporations and business entities. Where advisers manage Private Funds in addition to portfolio management services, the potential for a conflict of interest is magnified, particularly where the firm may have an incentive to favor those accounts charged a performance fee. Since WAM's advisory services do not incorporate performance fees or the offering of any additional investment services, side-by-side management does not apply to those services rendered by WAM.

Item 7: Types of Clients

As mentioned throughout this brochure, WAM provides investment management services to individuals, high net-worth individuals, pension and profit sharing plans, trusts, estates, charitable organizations, corporations and business entities. Prior to engaging the firm for services, clients are required to enter into a written agreement with the firm setting forth the terms and conditions under which WAM renders its services.

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

Methods of Analysis and Investment Strategies: WAM's methods of analysis include charting analysis, fundamental analysis, technical analysis, and cyclical analysis.

Charting analysis involves the use of patterns in performance charts. WAM uses this technique to search for patterns used to help predict favorable conditions for buying and/or selling a security.

Fundamental analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

Technical analysis involves the analysis of past market data; primarily price and volume.

Cyclical analysis involves the analysis of business cycles to find favorable conditions for buying and/or selling a security.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Material Risks Involved: WAM uses Long Term Trading, Short Term Trading, and Option Writing Strategies (including covered options, uncovered options, or spreading strategies).

WAM utilizes investment strategies that are designed to capture market rates of both return and risk. Frequent trading, when done, can affect investment performance, particularly through increased brokerage and other transaction costs and taxes. Short sales and option writing generally hold greater risk and clients should be aware that there is a chance of material risk of loss using any of those strategies.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Risks of Specific Securities Utilized: WAM generally seeks investment strategies that do not involve significant or unusual risk beyond that of the general domestic and/or international equity markets.

Past performance is not a guarantee of future returns. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Item 9: Disciplinary Information

Rule 206(4)-4 of the Investment Advisers Act of 1940 requires investment advisers to provide clients with disclosures as to any legal or disciplinary activities deemed material to the client's evaluation of the adviser. Please note, neither the firm nor its personnel have any disciplinary, regulatory, criminal, civil, or otherwise reportable history to disclose at this time.

Item 10: Other Financial Industry Activities and Affiliations

Joseph Worthy, President of Worthy Asset Management, is licensed in the states of Maryland and Pennsylvania to write and sell life and health insurance products. Mr. Worthy may receive commissions from various insurance companies as a result of this business. He devotes 5 hours a month on these activities and receives 5% of total yearly compensation from this business.

Joseph Worthy, owner of Joseph E Worthy, a tax preparation service where he prepares and filed individual tax returns. He devotes 5 hours a month on these activities and receives 5% of total yearly compensation from this business.

The firm endeavors at all times to put client-interest first as part of its fiduciary duty. However, clients should be aware that the receipt of additional compensation itself creates a conflict of interest, and may affect the judgment of this individual when making investment recommendations. In order to properly handle such potential conflicts of interest, the firm has adopted a Code of Ethics. Please see Item 11 (below) for further discussion related to the firm's Code of Ethics.

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

As required by Rule 204A-1 of the Investment Advisers Act of 1940, WAM has adopted a Code of Ethics that sets forth the basic policies of ethical conduct for all managers, officers, and employees of the firm. The Code of Ethics describes the firm's fiduciary duties and obligations to clients, and sets forth the firm's practice of supervising the personal securities transactions of employees who maintain access to client information. A copy of the firm's Code of Ethics will be provided to any client upon request.

Recommendations Involving Material Financial Interests: WAM does not recommend that clients buy or sell any security in which a related person to WAM has a material financial interest.

Investing Personal Money in the Same Securities as Clients: From time to time, representatives of WAM may buy or sell securities for themselves that they also recommend to clients. WAM will always document any transactions that could be construed as conflicts of interest and will always transact client business before their own when similar securities are being bought or sold.

Item 12: Brokerage Practices

As an investment adviser, WAM has a fiduciary duty to seek best execution for client transactions. Best execution is a collective consideration of factors concerning the trade in question. Such factors include:

- the security being traded,
- the price of the trade,
- the speed of the execution,
- apparent conditions in the market,
- And the specific needs of the client.

WAM's primary objectives when placing orders for the purchase and sale of securities for accounts is to obtain the most favorable net results taking into consideration these factors.

WAM recommends that clients utilize the brokerage and clearing services of Equity Trust Company and its affiliates for investment management accounts. In recommending Equity Trust Company, WAM considers the following factors: financial strength, reputation, execution, pricing, research, and service. Accordingly, WAM may not necessarily pay the lowest commission or commission equivalent as specific transactions may involve specialized services on the part of the broker. This would justify higher commissions (or their equivalent) than other transactions requiring routine services. However, WAM will negotiate the brokerage commission(s) paid on all securities transactions executed on behalf of client/fund accounts.

Transactions for each client generally will be effected independently, unless the firm decides to buy or sell the same securities for several clients at approximately the same time. In this case, WAM will elect to combine or aggregate orders (i.e. block trading) in order to obtain an average price and allocate shares among several client accounts. Shares will be distributed pro-rata (or other appropriate method depending on the circumstances) and in accordance with WAM's established allocation policy.

WAM periodically reviews its policies and procedures regarding recommending broker-dealers to its client in light of its duty to obtain best execution. If a client directs WAM in writing to use a particular broker-dealer to execute some or all transactions, the client will negotiate the terms and conditions for that account with that broker-dealer and WAM will not seek better execution.

Since WAM will not have the ability to aggregate client transactions or negotiate commissions in this situation, the client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case.

The firm does not receive any research, products, client referrals, or other services from a broker-dealer or third party in connection with client-based securities transactions (i.e. soft dollars).

Item 13: Review of Accounts

For those clients that receive active investment management services, WAM monitors those portfolios as part of an ongoing process. Regular account reviews are conducted on at least a quarterly basis by Joseph Worthy. Clients are encouraged to contact the firm immediately with any changes to their financial situation as such changes may impact the status of their investment account(s). WAM will contact investment advisory clients at least annually to review its previous services and/or recommendations and to discuss the impact of any changes in the client's financial situation and/or investment objectives.

Clients receive written statements no less than quarterly from the trustee or qualified custodian. In addition, client's may receive other supporting reports from asset managers, trust companies or custodians, insurance companies, broker/dealers, and others involved with client accounts.

Item 14: Client Referrals and Other Compensation

WAM does not compensate others for client referrals or receive other compensation outside that earned from its advisory services.

Item 15: Custody

Other than the client authorized direct deductions of fees from accounts held by a qualified custodian, WAM does not maintain or accept custody of client funds or securities. Clients will receive a monthly or quarterly statement directly from the custodian. It is advised that clients carefully review those statements and promptly report any discrepancies to WAM immediately.

Item 16: Investment Discretion

For actively managed investment advisory accounts, WAM has discretion over the selection and amount of securities to be bought or sold in client accounts without obtaining prior consent or approval from clients. These accounts require the careful research, selection, and monitoring of individual equities, ETFs, Mutual Funds, REITS and other fixed income securities. These investments are generally suitable for certain clients with larger accounts that seek a more aggressive active investment strategy. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the client and agreed to by WAM.

Discretionary authority will only be authorized upon full disclosure to the client. The granting of such authority will be evidenced by the client's execution of an agreement containing all applicable limitations to such authority. All discretionary trades made by WAM will be in accordance with each client's investment objectives and goals.

Item 17: Voting Client Securities

WAM will not vote, nor advise clients how to vote, proxies for securities held in client accounts. The client maintains the authority and responsibility for the voting of these proxies. The firm and its clients agree to this by contract.

Clients will receive their proxies or other solicitations directly from the transfer agent where applicable.

Item 18: Financial Information

Under Rule 206(4)-4 of the Investment Advisers Act of 1940, investment advisers are required to disclose certain financial information about their business practices that might serve as material to the client's decision in choosing an investment adviser.

As of the date of this filing, WAM does not require the pre-payment of any fees or maintain any financial hardships or other conditions that might impair its ability to meet its contractual obligations to clients.

Item 19: Requirements of State Registered Advisers

Please refer to Part 2B for further information with respect to firm personnel. WAM requires that persons providing investment advice have a college degree. Such representatives must also meet the appropriate qualifications for registration and have relevant investment-related experience.

Item 20: Additional Information

Privacy Policy: WAM never discloses the non-public personal information collected about its clients/investors to anyone except in furtherance of our business relationship, and then only to those persons necessary to effect the transactions and provide the services that the client/investor authorize (such as broker-dealers, custodians, investment managers etc.) or as otherwise provided by law. Additional information about the Privacy Policy is available upon request.

Business Continuity Plan: A copy of WAM's Business Continuity Plan is available upon request.

**FORM ADV Uniform Application for Investment Adviser Registration
Part 2B: Brochure Supplements
Investment Adviser Representatives and/or Supervised Persons: Supplemental information
Item 1: Cover Page**

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March 30, 2021

This brochure supplement provides information about Joseph E. Worthy that supplements the Worthy Asset Management LLC d/b/a Worthy Financial Services brochure. You should have received a copy of that brochure. Please contact Joseph E. Worthy, Investment Adviser Representative, at the phone number listed above if you did not receive Worthy Asset Management LLC d/b/a Worthy Financial Services's brochure or if you have any questions about the contents of this supplement.

Additional information about Joseph E. Worthy is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2: Educational Background and Business Experience

Joseph E. Worthy: President, Chief Compliance Officer, Investment Adviser Representative (CRD# 2484078)

Year Born: 1970

Education: Shippensburg University of Pennsylvania, B.S. in Business Administration, 1993

Business Experience:

02/2007 - Present	Worthy Asset Management LLC
10/2006 - 02/2007	d/b/a Worthy Financial Services
08/2005 - 10/2006	Joseph E. Worthy
03/1994 - 08/2005	USAllianz Securities, Inc.
03/1994 - 08/2005	Pruco Securities, LLC.
	Prudential Insurance Company

Licenses: Series 63, Series 65

Item 3: Disciplinary Information

Mr. Worthy does not have any legal, civil, criminal, regulatory, or disciplinary history to report at this time. Further information can be obtained by calling the Maryland Securities Division at 410-576-6360.

Item 4: Other Business Activity

Joseph Worthy, President of Worthy Asset Management, is licensed in the states of Maryland and Pennsylvania to write and sell life and health insurance products. Mr. Worthy may receive commissions from various insurance companies as a result of this business. He devotes 5 hours a month on these activities and receives 5% of total yearly compensation from this business.

Joseph Worthy, owner of Joseph E Worthy, a tax preparation service where he prepares and filed individual tax returns. He devotes 5 hours a month on these activities and receives 5% of total yearly compensation from this business.

Item 5: Additional Compensation

As described in Item 4 above, Joseph Worthy may receive commissions from various insurance companies as a result of his insurance business.

Item 6: Supervision

Joseph Worthy is a sole owner of WAM and maintains the responsibility to supervise the operations of his firm. This supervision extends to the ongoing review of the firm's business practices and monitoring the advice given to clients. Mr. Worthy is currently the only investment adviser representative at the firm. Questions related to the operations and supervision of the firm may be directed to Mr. Worthy at the phone number listed on the cover of this brochure supplement.