

## Item 1: Cover Page

### **Ant Money Investment Program** **Wrap Fee Program Brochure Supplement**

### **Walter Wemple Cruttenden III**

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March 16, 2022

This brochure supplement provides information about Walter Cruttenden that supplements the brochure for the Ant Money Investment Program that AMA sponsors and manages. You should have received a copy of that brochure. Please contact [info@antmoneyadvisors.com](mailto:info@antmoneyadvisors.com) if you did not receive the Ant Money Investment Program brochure or if you have any questions about the contents of this supplement.

Additional information about Walter Cruttenden is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2: Educational Background and Business Experience

Walter Cruttenden (b. 1950) is a financial markets innovator, an active founder investor in growth companies that serve a social need.

Walter is a co-founder and will serve as Chief Investment Officer of AMA.

Walter serves as Chairman of Acorns Grow, Inc., a micro investing company, which he co-founded. Acorns is an app that enables people to save and invest in incredibly small increments, with high frequency, requiring little or no conscious effort. Acorns owns Acorns Advisers, LLC, an investment adviser, and Acorns Securities, LLC, a carrying broker-dealer. Walter and his son, Jeffrey Cruttenden, developed the initial model portfolios for the Acorns Advisers Wrap Fee Program. Walter serves on Acorns Advisers, LLC's Investment Committee.

Walter serves as Chairman of Blast Intergalactic Group, Inc. ("BIG"), a gamification company operating at the nexus of the Fintech and Game industries. BIG's app, Blast, features a new game dynamic that improves the financial outcome for both gamers and game companies alike. Walter co-founded Ant Money, Inc. ("AMI"). BIG and AMI each own half of AMA's parent company, Ant Farm, Inc.

In his early career, Walter founded and served as CEO of two well-known investment banking and brokerage firms; Cruttenden Roth (now Roth Capital, active underwriters of emerging growth companies), and E\*Offering, formerly the investment banking arm of E\*Trade Securities (since merged). As CEO, Walter led both companies through rapid growth and significant liquidity events. Walter also co-founded SRS Laboratories (since acquired by DTS), after buying the acoustic technology from Hughes, and developing it into an independent company. Cruttenden also founded one of the largest growth stock conferences in the US, now the Roth Conference.

Walter has no formal education after high school.

## Item 3: Disciplinary Information

Walter Cruttenden has not been the subject of or involved in any material disciplinary or enforcement event.

## Item 4: Other Business Activities

Walter Cruttenden is not currently registered, and has no application pending to register, as a broker-dealer, registered representative of a broker-dealer, futures commission merchant ("FCM"), commodity pool operator ("CPO"), commodity trading advisor ("CTA"), or an associated person of an FCM, CPO, or CTA. Walter is registered with the State of California as an investment adviser representative of Acorns Advisers, LLC. He is a founder and member of the Investment Committee of Acorns Advisers, LLC. He is Chairman of Acorns Grow, Inc.,

which owns and controls Acorns Advisers, LLC and its affiliated SEC-registered broker-dealer and Financial Industry Regulatory Authority member firm, Acorns Securities, LLC (Acorns Grow, Inc., Acorns Advisers, LLC, and Acorns Securities, LLC, referred to collectively as “Acorns”).

Walter’s relationship with Acorns does not create a material conflict with the interests of AMA’s clients. His work with Acorns does not impose demands on his time that materially impair his ability to fulfill his duties to AMA’s clients with respect to selection of model portfolio funds and the list of individual stocks from which clients choose.

Walter Cruttenden does not receive distribution or service fees from the sale of mutual funds or any other commissions, bonuses or other compensation based on the sale of securities or other investment products.

Walter expends approximately 10 to 20 percent of his time working on the activities of each of the following AMA affiliates: Blast Intergalactic Group, Inc. (“BIG”) and Ant Money, Inc. (“AMI”).

## Item 5: Additional Compensation

Walter is a co-founder and part owner of AMA’s affiliates, BIG and AMI.. BIG earns revenue from the provision of educational content and technology for the Learn & Earn mobile application and through publisher affiliate programs for the Blast mobile application, in which participants of either may invest through the Ant Money Investment Program. AMI earns revenue from advertising in the ATM.com app, which generates funds that users may invest through the Ant Money Investment Program.

## Item 6: Supervision

AMA’s Chief Compliance Officer supervises Walter Cruttenden’s activities with respect to Walter’s activities as Chief Investment Officer, his compliance with the Investment Advisers Act of 1940, as amended, and his fiduciary duties to AMA’s clients. Among other things, the Chief Compliance Officer reviews the following no less frequently than quarterly and at other times the Chief Compliance Officer deems advisable in his discretion: (i) Walter’s selection of funds for AMA’s model portfolio; (ii) Walter’s selection of stocks for the Eligible Stock list from which clients may choose; (iii) Walter’s and AMA’s arrangements with BIG and AMI, if any, regarding compensation generated by activities of AMA clients; and (iv) Walter’s personal, family, and trust investment transactions to identify potential conflicts of between Walter’s interests and those of AMA clients. AMA’s Chief Compliance Officer is currently William Topaz, who is reachable through AMA at (949) 629-4210 and [info@antmoneyadvisors.com](mailto:info@antmoneyadvisors.com).