

Smartvestor Pro/Dave Ramsey

Updated 12/15/24

The SEC's updated Marketing Rule 206(4)-1, effective November 2023, includes specific guidance regarding the use of endorsements in marketing materials. For participants in Dave Ramsey's Smartvestor Pro program, we are providing this information to ensure you meet the SEC requirements as well as LPL policy.

Endorsements -Rule 206(4)-1(b)

Where compensation is provided, directly or indirectly, for an endorsement, the marketing materials must clearly and prominently state: (1) the endorsement is not provided by a current client or investor; (2) cash or non-cash compensation was provided; (3) the material terms of the compensation arrangement including a description of the compensation provided; and if applicable (4) a brief statement regarding any material conflicts in interest resulting from the endorser's relationship with the advisor.

Advisor Action item

In order to meet this requirement, the following disclosure must appear "at the time the endorsement is disseminated", i.e., on your website, email signature, and any other marketing collateral that reference the Smartvestor Pro program:

SmartVestor is an advertising and referral service for investment professionals operated by The Lampo Group, LLC, d/b/a Ramsey Solutions. SmartVestor provides referrals to financial professionals of LPL Financial, LLC (LPL). SmartVestor is not a current client of LPL for brokerage or advisory services. Financial professionals of LPL pay SmartVestor cash compensation for these referrals, which creates the incentive for SmartVestor to make these referrals, resulting in a conflict of interest. Please visit [[SmartVestor investing professionals | RamseySolutions.com](https://SmartVestor.investingprofessionals.com)]¹ to learn more.

Misleading Statement of Material Fact -Rule 206(4)-1(a)

This rule prohibits an advisor from making an untrue statement of a material fact or from omitting material facts necessary in order to ensure statements are not misleading. Following are examples of misleading statements that may not be used in marketing materials:

Smartvestor Pros:

- are held to a higher standard
- are handpicked, vetted, or selected by Dave
- "earn" the status
- are held accountable by Dave and/or his team
- partner with Dave
- personally know or work together with Dave

¹ This link must take the reader to the IAR-specific disclosure on the SmartVestor website, which includes the payments made to Ramsey Solutions by that IAR.

These types of statements are not supported by the information provided on Ramsey Solutions website and are considered misleading.

Additionally, photos of Dave or his team may not appear on your website.

In general marketing materials may only reference that you are a part of the Smartvestor Pro program, and you may include the Smartvestor logo.

Advisors may not reference or participate in:

- RamseyTrusted
- Foundations in Personal Finance Curriculum
- Financial Coach Master Training (FCMT)
- Endorsed Local Providers (ELP)

Advisor Action item

Ensure that any references to Dave Ramsey and the SmartVestor program in all marketing materials are limited to you being a participant of the program. You may include the logo.