

INTEG Financial Investment Advisory, LLC

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Firm Brochure (Form ADV Part 2A)

August 15, 2025

ITEM 1 COVER PAGE

This brochure provides information about the qualifications and business practices of INTEG Financial Investment Advisory, 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. Registration (e.g. “registered investment advisor”) does not imply a certain level of skill or training.

Additional information about INTEG Financial Investment Advisory, LLC also is available on the SEC’s website at www.adviserinfo.sec.gov.



TEM 2 MATERIAL CHANGES

INTEG Financial Investment Advisory, LLC will ensure that clients receive a summary of any material changes to this and subsequent disclosure brochures within 120 days after the Firm's fiscal year end, December 31. This means that if there were any material changes over the past year, clients will receive a summary of those changes no later than April 30. At that time, INTEG Financial Investment Advisory, LLC will also offer a copy of its most current disclosure brochure and may also provide other ongoing disclosure information about material changes as necessary. If there are no material changes over the past year, no notices will be sent.

Clients and prospective clients can always receive the most current disclosure brochure for INTEG Financial Investment Advisory, LLC at any time by contacting their investment advisor representative.

This is a new brochure as of August 15, 2025.



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ITEM 4 ADVISORY BUSINESS

Firm Description

INTEG Financial Investment Advisory, LLC (“INTEGFI”) is a state registered investment advisor. INTEGFI was founded on May 8, 2025, in the state of California and applied to become a registered investment adviser on July 10, 2025.

The Principal Owner of INTEGFI is: Pezhman Amini.

Types of Advisory Services

INTEGFI provides a variety of services offerings including portfolio management, holistic financial planning including budgeting and cash flow management, debt management, investment planning, tax planning, insurance and risk management, retirement planning, estate planning, education planning, philanthropy, and business succession planning for individuals. The Firm offers these services to clients or potential clients (“clients”).

Portfolio Management Services:

INTEGFI offers discretionary or non-discretionary ongoing portfolio management services. These services are based on the individual goals, objectives, time horizon, and risk tolerance of each client. INTEGFI assesses clients’ current holdings and ensures alignment with both short- and long-term goals. The Firm performs ongoing reviews of investment performance and portfolio exposure to market conditions.

Under a discretionary advisory agreement, the Firm is authorized to perform various functions without further approval from the client, such as the determination of securities to be purchased or sold without prior permission from the client for each transaction. Any and all trades are made in the best interest of the client as part of INTEGFI’s fiduciary duty. However, risk is inherent to any investing strategy and model. Therefore, INTEGFI does not guarantee any results or returns.

Prior to engaging INTEGFI to provide any investment advisory services, INTEGFI requires a written advisory agreement signed by the client prior to the engagement of any services. The agreement will outline services to which the client is entitled and fees the client will incur.

INTEGFI does not act as a custodian of client assets. The client always maintains asset control. INTEGFI places trades for clients under a limited power of attorney through qualified custodian/broker.

Comprehensive Financial Planning:

Financial plans and financial planning may include but are not limited to:

- Investment Planning,
- Budgeting and Cash Flow Analysis,
- Debt Management,
- Insurance and Risk Management,
- Retirement Planning, Savings, and Income Analysis



- Estate Planning and document review analysis,
- Education Planning,
- Charitable Giving Review/Philanthropy
- Business Succession Planning.

These services can range from broad-based financial planning to consultative or single subject planning. If you retain our firm for financial planning services, we will consult with you to gather information about your financial circumstances and objectives. We may also use financial planning software to determine your current financial position, and to define and quantify your long-term goals and objectives. Once we specify those long-term objectives (both financial and non-financial), we may develop shorter-term, targeted objectives.

Once we review and analyze the information you provide to our firm and the data derived from our financial planning software, we may deliver a written plan to you, designed to help you achieve your stated financial goals and objectives.

Financial plans are based on your financial situation at the time we present the plan to you, and on the financial information you provide to us. You must promptly notify our firm of your financial situation, goals, objectives, or needs change.

A conflict exists between the interests of INTEGFI and the interests of the Client. The Client is under no obligation to act upon any recommendation made by INTEGFI, and, if the Client elects to act on any such recommendation, the Client is under no obligation to effect the transaction through INTEGFI.

General Consulting:

To the extent specifically requested by the client, INTEGFI may be engaged to provide consulting services for a separate flat fee as described in Item 5 below. INTEGFI may determine to charge for such additional services, the dollar amount of which shall be set forth in a separate written agreement with the client.

Services are offered in several areas of a client's financial situation, depending on their goals and objectives. Generally, such consulting services involve rendering a specific financial consultation based on the Client's financial goals and objectives. This consulting may encompass one or more areas of need, including but not limited to, investment planning, retirement planning, personal savings, education savings, insurance needs, and other areas of a client's financial situation.

Consulting recommendations pose a conflict between the interests of INTEGFI and the interests of the client. For example, INTEGFI has an incentive to recommend that clients engage INTEGFI for investment management services or to increase the level of investment assets with the Firm, as it would increase the amount of advisory fees paid to the Firm. Clients are not obligated to implement any recommendations made by INTEGFI or maintain an ongoing relationship with the Advisor. If the client elects to act on any of the recommendations made by the Firm, the client is under no obligation to implement the transaction through the Firm.

Services Tailored to Clients' Needs



Services are provided based on a client's specific needs within the scope of the services provided as discussed above. A review of the information provided by the client regarding the client's current financial situation, goals, and risk tolerances will be performed and advice will be provided that is in line with available information.

Clients may request that we refrain from investing in particular securities or certain types of securities. Clients must provide these restrictions to our firm in writing.

Wrap Fee Program versus Portfolio Management Program

INTEGFI does not offer a Wrap Fee Program.

Assets Under Management

As of August 15, 2025, INTEGFI has the following assets under management:

Discretionary assets:	\$0
Non-discretionary assets:	\$0
Total assets:	\$0

ITEM 5 FEES AND COMPENSATION

Fees and Other Charges

Individually Managed Accounts:

Fees for individually managed accounts are tier priced as follows:

\$0 - \$100,000	0.90%
\$100,001 - \$500,000	0.75%
\$500,001 - \$1,000,000	0.65%
\$1,000,001 and above	0.55%

This is a tiered fee progressing each dollar through the schedule, billed as the fee schedule indicates.

The annual fee is charged quarterly, in advance, based upon the market value of the assets being managed by INTEGFI on the last day of the previous quarter.

Each client's fee shall be agreed to by the client when they sign the Investment Advisory Agreement. Fees will be deducted from clients' assets quarterly unless otherwise arranged with an individual client. Lower fees for comparable services may be available from other sources.

Financial Planning and Consulting Fees:



INTEGFI charges a fixed fee for providing financial planning and consulting services under a stand-alone engagement. These fees are negotiable, but will typically range from \$500 to \$5,000, depending upon the scope and complexity of the services and the professional rendering the financial planning and/or the consulting services. All fixed fees for services offered by the firm will be determined in advance based on the agreement between the client and the firm and based on the information provided by the client at that time.

If the client engages the Firm for additional investment advisory services, INTEGFI may offset all or a portion of its fees for those services based upon the amount paid for the financial planning and/or consulting services. The terms and conditions of the financial planning and/or consulting engagement are set forth in the Advisory Agreement.

Fixed fees paid in advance will be prorated to the date of termination and the excess refunded to the client by check as soon as practicable. Where the Firm may request a fee in advance, the amount paid in advance will not be more than \$500 per client and 6 months in advance. The remaining fixed fees will be paid after services are performed. Lower fees for comparable services may be available from other sources.

Fee Deduction Disclosure

Where the Firm deducts its management fee from client accounts utilizing a qualified custodian, the Firm is required to meet the following requirements.

- a. Possess written authorization from the client to deduct advisory fees from an account held by a qualified custodian;
- b. The firm must send the qualified custodian a written invoice detailing the fee amount to be deducted from the client account; and,
- c. The firm must send the client a written invoice itemizing the fee, the invoice must detail any formulae used to calculate the fee, the time period covered by the fee and the amount of assets under management on which the fee was based. This may be included with the clients quarterly performance report.

Additional Fees and Expenses

In addition to the advisory fees paid to INTEGFI, clients also incur certain charges imposed by other third parties, such as broker-dealers, custodians, trust companies, banks and other financial institutions (collectively “Financial Institutions”). These additional charges include securities brokerage commissions, transaction fees, custodial fees, fees attributable to alternative assets, fees charged by the Independent Managers, margin costs, charges imposed directly by a mutual fund or ETF in a client’s account, as 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.



Advance Payment of Fees and Termination

INTEGFI's investment management fees are paid quarterly, in advance, based upon the market value of the assets being managed by INTEGFI on the last day of the previous quarter. Clients may request to terminate their advisory contract with INTEGFI, in whole or in part, by providing advance written notice. Upon termination, all fees will be prorated to the date of termination and clients will be refunded the final asset-based fee based on the number of days services were rendered during the quarter. Client's advisory agreement with the Advisor is non-transferable without Client's written approval.

All fixed fees charged in advance will be earned within six months. Upon termination, fixed fees paid in advance will be prorated to the date of termination and the excess refunded to the client by check as soon as practicable. Where the firm may request a fee in advance, the amount paid in advance will not be more than \$500 per client and 6 months in advance. The remaining fixed fees will be paid after services are performed.

Upon termination, any fees paid in advance will be refunded to client by check issued to the client within 30-days.

Compensation for the Sale of Securities or Investment Products

INTEGFI is an asset-based fee investment management firm. Neither INTEGFI nor its supervised persons accept any commissions or compensation for the sale of securities nor other investment products, including asset-based sales charges or service fees from the sale of mutual funds. The firm is not affiliated with entities that sell financial products or securities.

Persons providing investment advice on behalf of our Firm are also licensed as independent insurance agents. These persons will earn commission-based compensation for selling insurance products, including insurance products they sell to you. Insurance commissions earned by these persons are separate and in addition to our advisory fees. This practice presents a conflict of interest because persons providing investment advice on behalf of our Firm, who are insurance agents, have an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely based on your needs. You are under no obligation, contractually or otherwise, to purchase insurance products through any person affiliated with our Firm.

ITEM 6 PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

INTEGFI does not charge nor accept performance-based fees. INTEGFI does not engage in side-by-side management.

ITEM 7 TYPES OF CLIENTS

INTEGFI provides investment advice to individuals.



INTEGFI does not have a minimum investment account balance.

ITEM 8 METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

Methods of Analysis

The Firm may use the following methods when considering investment strategies and recommendations.

Charting Review

Charting is a technical analysis that charts the patterns of stocks, bonds, and commodities to help determine buy and sell recommendations for clients. It is a way of gathering and processing price and volume information in a security by applying mathematical equations and plotting the resulting data onto graphs in order to predict future price movements. A graphical historical record assists the analyst in spotting the effect of key events on a security's price, its performance over a period of time, and whether it is trading near its high, near its low or in between. Chartists believe that recurring patterns of trading, commonly referred to as indicators, can help them forecast future price movements.

Fundamental Review

A fundamental analysis is a method of evaluating a company or security by attempting to measure its intrinsic value. Fundamental analysis attempts to determine the true value of a company or security by looking at all aspects of the company or security, including both tangible factors (e.g., machinery, buildings, land, etc.) and intangible factors (e.g., patents, trademarks, "brand" names, etc.). Fundamental analysis also involves examining related economic factors (e.g., overall economy and industry conditions, etc.), financial factors (e.g., company debt, interest rates, management salaries and bonuses, etc.), qualitative factors (e.g., management expertise, industry cycles, labor relations, etc.), and quantitative factors (e.g., debt-to-equity and price-to-equity ratios).

The end goal of performing fundamental analysis is to produce a value that an investor can compare with the security's current price with the aim of determining what sort of position to take with that security (e.g., if underpriced, the security should be bought; if overpriced the security should sold). Fundamental analysis uses real data to evaluate a security's value. Although most analysts use fundamental analysis to value stocks, this method of valuation can be used for many types of securities.

Technical Review

A technical analysis is a method of evaluating securities that analyzes statistics generated by market activity, such as past prices and volume. Technical analysis does not attempt to measure a security's intrinsic value, but instead uses past market data and statistical tools to identify patterns that can suggest future activity. Historical performance of securities and the markets can indicate future performance.



Cyclical Review

A cyclical analysis assumes the market reacts in reoccurring patterns that can be identified and leveraged to provide performance. Cyclical analysis of economic cycles is used to determine how these reoccurring patterns, or cycles, affect the returns of a given investment, asset, or company. Cyclical analysis is a time-based assessment which incorporates past and present performance to determine future value. Cyclical analyses exist because the broad economy has been shown to move in cycles, from periods of peak performance to periods of low performance. The risks of this strategy are two-fold: (1) the markets do not always repeat cyclical patterns; and (2) if too many investors begin to implement this strategy, it changes the very cycles of which they are trying to take advantage.

Economic Review

An economic analysis determines the economic environment over a certain time horizon. This involves following and updating historic economic data such as U.S. gross domestic product and consumer price index as well as monitoring key economic drivers such as employment, inflation, and money supply for the world's major economies.

Investment Strategies

When implementing investment advice to clients, the Firm may employ a variety of strategies to best pursue the objects of clients. Depending on market trends and conditions, INTEGFI will employ any technique or strategy herein described, at the Firm's discretion and in the best interests of the client. The Firm does not recommend any particular security or type of security. Instead, the Firm makes recommendations to meet a particular client's financial objectives. There is inherent risk to any investment and clients may suffer loss of ALL OR PART of a principal investment.

Long-Term Purchases

Long-term purchases are securities that are purchased with the expectation that the value of those securities will grow over a relatively long period, generally greater than one year. Long-term purchases may be affected by unforeseen changes in the company in which a client is invested or in the overall market. Long term trading is designed to capture market rates of both return and risk. Frequent trading can affect investment performance, particularly through increased brokerage and other transaction costs and taxes. Due to its nature, the long-term strategy can expose clients to various other types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include, but are not limited to, inflation (purchasing power) risk, interest rate risk, economic risk, and political/regulatory risk.

Short-Term Purchases

Short-term purchases are securities that are purchased with the expectation that they will be sold within a relatively short period of time, generally less than one year, to take advantage of the



securities' short-term price fluctuations. Short-term trading generally holds greater risk. Frequent trading can affect investment performance due to increased brokerage fees and other transaction costs and taxes.

Strategic Asset Allocation

Asset allocation is a combination of several different types of investments; typically, this includes stocks, bonds, and cash equivalents among various asset classes to achieve diversification. The objective of asset allocation is to manage risk and market exposure while still positioning a portfolio to meet financial objectives.

Risk of Loss

Investing inherently involves risk up to and including loss of the principal sum. Further, past performance of any security is not necessarily indicative of future results. Therefore, future performance of any specific investment or investment strategy based on past performance should not be assumed as a guarantee. INTEGFI does not provide any representation or guarantee that the financial goals of clients will be achieved.

The potential return or gain and potential risk or loss of an investment varies, generally speaking, with the type of product invested in. Below is an overview of the types of products available on the market and the associated risks of each:

General Risks. Investing in securities always involves risk of loss that you should be prepared to bear. We do not represent or guarantee that our services or methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines. We cannot offer any guarantees or promises that your financial goals and objectives can or will be met. Past performance is in no way an indication of future performance. We also cannot assure that third parties will satisfy their obligations in a timely manner or perform as expected or marketed.

General Market Risk. Investment returns will fluctuate based upon changes in the value of the portfolio securities. Certain securities held may be worth less than the price originally paid for them, or less than they were worth at an earlier time.

Common Stocks. Investments in common stocks, both directly and indirectly through investment in shares of ETFs, may fluctuate in value in response to many factors, including, but not limited to, the activities of the individual companies, general market and economic conditions, interest rates, and specific industry changes. Such price fluctuations subject certain strategies to potential losses. During temporary or extended bear markets, the value of common stocks will decline, which could also result in losses for each strategy.

Portfolio Turnover Risk. High rates of portfolio turnover could lower performance of an investment strategy due to increased costs and may result in the realization of capital gains. If an investment strategy realizes capital gains when it sells its portfolio investments, it will increase taxable distributions to you. High rates of portfolio turnover in a given year would likely result in



short-term capital gains and under current tax law you would be taxed on short-term capital gains at ordinary income tax rates, if held in a taxable account.

Non-Diversified Strategy Risk. Some investment strategies may be non-diversified (e.g., investing a greater percentage of portfolio assets in a particular issuer and owning fewer securities than a diversified strategy). Accordingly, each such strategy is subject to the risk that a large loss in an individual issuer will cause a greater loss than it would if the strategy held a larger number of securities or smaller positions sizes.

Model Risk. Financial and economic data series are subject to regime shifts, meaning past information may lack value under future market conditions. Models are based upon assumptions that may prove invalid or incorrect under many market environments. We may use certain model outputs to help identify market opportunities and/or to make certain asset allocation decisions.

There is no guarantee any model will work under all market conditions. For this reason, we include model related results as part of our investment decision process but we often weigh professional judgment more heavily in making trades or asset allocations.

ETF Risks, including Net Asset Valuations and Tracking Error. An ETF's performance may not exactly match the performance of the index or market benchmark that the ETF is designed to track because 1) the ETF will incur expenses and transaction costs not incurred by any applicable index or market benchmark; 2) certain securities comprising the index or market benchmark tracked by the ETF may, from time to time, temporarily be unavailable; and 3) supply and demand in the market for either the ETF and/or for the securities held by the ETF may cause the ETF shares to trade at a premium or discount to the actual net asset value of the securities owned by the ETF. Certain ETF strategies may from time to time include the purchase of fixed income, commodities, foreign securities, American Depositary Receipts, or other securities for which expenses and commission rates could be higher than normally charged for exchange-traded equity securities, and for which market quotations or valuation may be limited or inaccurate.

Clients should be aware that to the extent they invest in ETF securities they will pay two levels of advisory compensation – advisory fees charged by Adviser plus any advisory fees charged by the issuer of the ETF. This scenario may cause a higher advisory cost (and potentially lower investment returns) than if a Client purchased the ETF directly. An ETF typically includes embedded expenses that may reduce the ETF's net asset value, and therefore directly affect the ETF's performance and indirectly affect a Client's portfolio performance or an index benchmark comparison. Expenses of the ETF may include investment advisor management fees, custodian fees, brokerage commissions, and legal and accounting fees. ETF expenses may change from time to time at the sole discretion of the ETF issuer. ETF tracking error and expenses may vary.

Inflation, Currency, and Interest Rate Risks. Security prices and portfolio returns will likely vary in response to changes in inflation and interest rates. Inflation causes the value of future dollars to be worth less and may reduce the purchasing power of an investor's future interest payments and principal. Inflation also generally leads to higher interest rates, which in turn may cause the value of many types of fixed income investments to decline. In addition, the relative value of the



U.S. dollar-denominated assets primarily managed by Adviser may be affected by the risk that currency devaluations affect Client purchasing power.

Liquidity Risk. Liquidity is the ability to readily convert an investment into cash to prevent a loss, realize an anticipated profit, or otherwise transfer funds out of the particular investment. Generally, investments are more liquid if the investment has an established market of purchasers and sellers, such as a stock or bond listed on a national securities exchange. Conversely, investments that do not have an established market of purchasers and sellers may be considered illiquid. Your investment in illiquid investments may be for an indefinite time, because of the lack of purchasers willing to convert your investment to cash or other assets.

Legislative and Tax Risk. Performance may directly or indirectly be affected by government legislation or regulation, which may include, but is not limited to: changes in investment advisor or securities trading regulation; change in the U.S. government's guarantee of ultimate payment of principal and interest on certain government securities; and changes in the tax code that could affect interest income, income characterization and/or tax reporting obligations, particularly for options, swaps, master limited partnerships, Real Estate Investment Trust, Exchange Traded Products/Funds/Securities. We do not engage in tax planning, and in certain circumstances a Client may incur taxable income on their investments without a cash distribution to pay the tax due. Clients and their personal tax advisors are responsible for how the transactions in their account are reported to the IRS or any other taxing authority.

Foreign Investing and Emerging Markets Risk. Foreign investing involves risks not typically associated with U.S. investments, and the risks maybe exacerbated further in emerging market countries. These risks may include, among others, adverse fluctuations in foreign currency values, as well as adverse political, social, and economic developments affecting one or more foreign countries.

In addition, foreign investing may involve less publicly available information and more volatile or less liquid securities markets, particularly in markets that trade a small number of securities, have unstable governments, or involve limited industry. Investments in foreign countries could be affected by factors not present in the U.S., such as restrictions on receiving the investment proceeds from a foreign country, foreign tax laws or tax withholding requirements, unique trade clearance or settlement procedures, and potential difficulties in enforcing contractual obligations or other legal rules that jeopardize shareholder protection. Foreign accounting may be less transparent than U.S. accounting practices and foreign regulation may be inadequate or irregular.

Information Security Risk. We may be susceptible to risks to the confidentiality and security of its operations and proprietary and customer information. Information risks, including theft or corruption of electronically stored data, denial of service attacks on our website or websites of our third-party service providers, and the unauthorized release of confidential information are a few of the more common risks faced by us and other investment advisers. Data security breaches of our electronic data infrastructure could have the effect of disrupting our operations and compromising our customers' confidential and personally identifiable information. Such breaches could result in an inability of us to conduct business, potential losses, including identity theft and theft of investment funds from customers, and other adverse consequences to



customers. We have taken and will continue to take steps to detect and limit the risks associated with these threats.

Tax Risks. Tax laws and regulations applicable to an account with Adviser may be subject to change and unanticipated tax liabilities may be incurred by an investor as a result of such changes. In addition, customers may experience adverse tax consequences from the early assignment of options purchased for a customer's account. Customers should consult their own tax advisers and counsel to determine the potential tax-related consequences of investing.

Advisory Risk. There is no guarantee that our judgment or investment decisions on behalf of particular any account will necessarily produce the intended results. Our judgment may prove to be incorrect, and an account might not achieve her investment objectives. In addition, it is possible that we may experience computer equipment failure, loss of internet access, viruses, or other events that may impair access to accounts' custodians' software. Adviser and its representatives are not responsible to any account for losses unless caused by Adviser breaching our fiduciary duty.

Dependence on Key Employees. An accounts success depends, in part, upon the ability of our key professionals to achieve the targeted investment goals. The loss of any of these key personnel could adversely impact the ability to achieve such investment goals and objectives of the account.

The Firm does not primarily recommend a particular type of security.

ITEM 9 DISCIPLINARY INFORMATION

Registered investment advisers are required to disclose any legal or disciplinary events that are material to a Client's or prospective Client's evaluation of the advisory business or integrity of INTEGFI's management.

INTEGFI has no disciplinary disclosures. Pezhman Amini, Owner and Chief Compliance Officer of INTEGFI, has no disciplinary disclosures.

ITEM 10 OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Registration as a Broker/Dealer or Broker/Dealer Representative

INTEGFI is not registered and does not have an application pending to register, as a broker dealer and its management persons are not registered as broker/dealer representatives and there are no pending applications to become such a representative.

Registration as a Futures Commission merchant, Commodity Pool Operator

INTEGFI and its management persons are not registered and do not have an application pending to register, as a futures commission merchant, commodity pool operator/advisor.



Relationships Material to this Advisory Business and Possible Conflicts of Interest

Persons providing investment advice on behalf of our Firm are also licensed as independent insurance agents. These persons will earn commission-based compensation for selling insurance products, including insurance products they sell to you. Insurance commissions earned by these persons are separate and in addition to our advisory fees. This practice presents a conflict of interest because persons providing investment advice on behalf of our Firm, who are insurance agents, have an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely based on your needs. To mitigate this conflict, the persons will adhere to their fiduciary standard of care and loyalty when providing investment advice and will only recommend products or services that are in the best interest of the client. You are under no obligation, contractually or otherwise, to purchase insurance products through any person affiliated with our Firm.

All material conflicts have been disclosed.

Selection of Other Advisors

INTEGFI does not utilize nor select other advisers or third-party managers.

ITEM 11 CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

Fiduciary Status and Code of Ethics

According to federal law, an investment advisor is considered a fiduciary. As a fiduciary, it is an investment advisor's responsibility to provide fair and full disclosure of all material facts. In addition, an investment advisor has a duty of utmost good faith to act solely in the best interest of each of its Clients. INTEGFI and its representatives have a fiduciary duty to all Clients.

INTEGFI and its representatives' fiduciary duty to Clients is considered the core underlying principle for INTEGFI's Code of Ethics and represents the expected basis for all representatives' dealings with Clients. INTEGFI has the responsibility to ensure that the interests of Clients are placed ahead of it or its representatives' own investment interest. All representatives will conduct business in an honest, ethical, and fair manner. All representatives will always comply with all federal and state securities laws. Full disclosure of all material facts and potential conflicts of interest will be provided to Clients prior to services being conducted. All representatives have a responsibility to avoid circumstances that might negatively affect or appear to affect the representatives' duty of complete loyalty to their Clients.

INTEGFI is a state registered investment advisor and has adopted a Code of Ethics that sets forth the basic policies of ethical conduct for all managers, officers, and employees of INTEGFI. In addition, the Code of Ethics governs personal trading by each employee of INTEGFI deemed to be an Access Person and is intended to ensure that securities transactions effected by Access



Persons of INTEGFI are conducted in a manner that avoids any conflict of interest between such persons and clients of INTEGFI or its affiliates.

INTEGFI collects and maintains records of securities holdings and securities transactions effected by Access Persons. These records are reviewed to identify and resolve conflicts of interest. INTEGFI's Code of Ethics is available upon request.

Investment Recommendations Involving a Material Financial Interest and Conflict of Interest

INTEGFI does not recommend that clients buy or sell any security in which a related person to INTEGFI or INTEGFI has a material financial interest. If any material financial interests arise, clients will be notified by INTEGFI. Material financial interest in this context does not include publicly traded securities outlined in Item 11 below. An example of material financial interest would be recommending an investment where INTEGFI owns 10% of the publicly traded security or has a directorship position with the company stock being recommended.

Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest

INTEGFI and/or its investment advisory representatives may from time to time purchase or sell products or investments that they may recommend to clients. INTEGFI has adopted a Code of Ethics that sets forth the basic policies of ethical conduct for all managers, officers, and employees of INTEGFI.

In addition, the Code of Ethics governs personal trading by each employee of INTEGFI deemed to be an Access Person and is intended to ensure that securities transactions effected by Access Persons of INTEGFI are conducted in a manner that avoids any actual or potential conflict of interest between such persons and clients of INTEGFI or its affiliates.

INTEGFI collects and maintains records of securities holdings and securities transactions effected by Access Persons. These records are reviewed to identify and resolve potential conflicts of interest. INTEGFI's Code of Ethics is available upon request.

Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest

INTEGFI employees may buy or sell securities at the same time they buy or sell securities for clients. In order to mitigate conflicts of interest such as front running, employees are required to disclose all reportable securities transactions as well as provide INTEGFI with copies of their brokerage statements. Front running is the illegal practice of purchasing a security based on advanced non-public information regarding an expected large transaction that will affect the price of a security.

The Chief Compliance Officer of INTEGFI is Pezhman Amini. He reviews all employee trades each quarter. The personal trading reviews ensure that the personal trading of employees does



not affect the markets and that clients of the firm receive preferential treatment over employee transactions.

ITEM 12 BROKERAGE PRACTICES

Recommendation of Broker/Dealers for Client Transactions

INTEGFI has a duty to select brokers, dealers and other trading venues that provide best execution for clients. The duty of best execution requires an investment adviser to seek to execute securities transactions for clients in such a manner that the client's total cost or proceeds in each transaction is the most favorable under the circumstances, taking into account all relevant factors. The lowest possible commission, while very important, is not the only consideration. INTEGFI generally recommends that Clients utilize the custody, brokerage and clearing services of Charles Schwab & Co. ("Schwab") ("the custodian" collectively) for investment management accounts.

It is the policy of the Firm to seek best execution in all portfolio trading activities for all investment disciplines and products, regardless of whether commissions are charged. This applies to trading in any instrument, security, or contract including equities, bonds, and forward or derivative contracts.

The standards and procedures governing best execution are set forth in several written policies. Generally, to achieve best execution, INTEGFI considers the following factors, without limitation, in selecting brokers and intermediaries: Execution capability;

- Order size and market depth;
- Availability of competing markets and liquidity;
- Trading characteristics of the security;
- Confidentiality;
- Reputation and integrity;
- Financial responsibility of the broker-dealer;
- Recordkeeping;
- Available technology;
- Ability to address current market conditions. Availability of accurate information comparing markets;
- Quantity and quality of research received from the broker dealer;
- Ability and willingness to commit capital; and
- Responsiveness;

INTEGFI evaluates the execution, performance, and risk profile of the broker-dealers it uses at least annually.

Research and Other Soft Dollar Benefits

Soft dollar practices are arrangements whereby an investment adviser directs transactions to a broker-dealer in exchange for certain products and services that are allowable under SEC and state rules. Client commissions may be used to pay for brokerage and research services and products as long as they are eligible under Section 28(e) of the Exchange Act of 1934. Section



28(e) sets forth a “safe harbor,” which provides that an investment adviser that has discretion over a client account is not in breach of its fiduciary duty when paying more than the lowest commission rate available if the adviser determines in good faith that the rate paid is commensurate with the value of brokerage and research services provided by the broker-dealer.

INTEGFI does not currently have any soft dollar benefit arrangements.

Brokerage for Client Referrals

INTEGFI does not receive client referrals from any broker-dealer or third party as a result of the firm selecting or recommending that broker-dealer to clients.

Directed Brokerage

As stated above, the Firm recommends Schwab as the Qualified Custodian and does not allow directed brokerage. We are independently owned and operated and are not affiliated with the custodian. The custodian will hold your assets in a brokerage account and buy and sell securities when we instruct them to. While we recommend that you use Schwab as custodian/broker, you will decide whether to do so and will open your account with the custodian by entering into an account agreement directly with them. We do not open the account for you, although we may assist you in doing so. Not all advisors require their clients to use a particular broker-dealer or other custodian selected by the advisor.

Order Aggregation

Firm does not block trade.

ITEM 13 REVIEW OF ACCOUNTS

Periodic Reviews

INTEGFI regularly reviews and evaluates client accounts for compliance with each client’s investment objectives, policies, and restrictions. INTEGFI analyzes rates of return and allocation of assets to determine model strategy effectiveness. Such reviews are conducted by the Chief Compliance Officer of INTEGFI and shall occur at least once per calendar year.

Intermittent Review Factors

Intermittent reviews may be triggered by substantial market fluctuation, economic or political events, or changes in the Client’s financial status (such as retirement, termination of employment, relocation, inheritance, etc.). Clients are advised to notify INTEGFI promptly if there are any material changes in their financial situation, investment objectives, or in the event they wish to place restrictions on their account.

Reports



Clients may receive confirmations of purchases and sales in their accounts and will receive, at least quarterly, statements containing account information such as account value, transactions, and other relevant information. Confirmations and statements are prepared and delivered by the custodian.

ITEM 14 CLIENT REFERRALS AND OTHER COMPENSATION

Client Referrals

INTEGFI will not receive any economic benefit from another person or entity for soliciting or referring clients.

Other Compensation

INTEGFI will not pay another person or entity for referring or soliciting clients for INTEGFI.

ITEM 15 CUSTODY

INTEGFI may deduct fees from Client accounts but would not have custody of Client funds otherwise. Clients will receive statements directly from the Firm as well as the agreed upon custodian, and copies of all trade confirmations directly from the custodian.

Clients whose fees are directly debited will provide written authorization to debit advisory fees from their accounts held by a qualified custodian chosen by the Client. Each quarter, Clients will receive a bill itemizing the fees to be debited, including the formula used to calculate the fee, the amount of assets the fee is based on, and the time period covered by the fee. The invoice will also state that the fee was not independently calculated by the custodian. The Client will also receive a statement from their account custodian showing all transactions in their account, including the fee.

We encourage Clients to carefully review the statements and confirmations sent to them by us and their custodian, and to compare the information on your quarterly report prepared by INTEGFI against the information in the statements provided directly from the custodian. Please alert us of any discrepancies.

ITEM 16 INVESTMENT DISCRETION

When INTEGFI is engaged to provide asset management services on a discretionary basis, we will monitor your accounts to ensure that they are meeting your asset allocation requirements. This authority allows INTEGFI and its affiliates to implement investment decisions without prior consultation with the client, including the decision to allocate among models. If any changes are needed to your investments, we will make the changes. These changes may involve selling a security or group of investments and buying others or keeping the proceeds in cash. You may at any time place restrictions on the types of investments we may use on your behalf, or on the allocations to each security type. You may receive at your request written or electronic confirmations from your account custodian after any changes are made to your account. You will also receive quarterly statements from your account custodian. Clients engaging us on a discretionary basis will be asked to execute a Limited Power of Attorney (granting us the



discretionary authority over the Client accounts) as well as an Investment Management Agreement that outlines the responsibilities of both the Client and INTEGFI.

When a Client engages INTEGFI to provide investment management services on a non-discretionary basis, the accounts are monitored by INTEGFI. The difference is that changes to your account will not be made until INTEGFI has confirmed with you (either verbally or in writing) that the proposed change is acceptable to you.

ITEM 17 VOTING CLIENT SECURITIES

INTEGFI does not perform proxy voting services on the Client's behalf. Clients are encouraged to read through the information provided with the proxy voting documents and to make a determination based on the information provided. Upon the Client's request, INTEGFI's representatives may provide limited clarifications of the issues presented in the proxy voting materials based on his or her understanding of issues presented in the proxy voting materials. However, Clients have the ultimate responsibility for making all proxy voting decisions.

Clients receive proxies directly from either custodians or transfer agents.

ITEM 18 FINANCIAL INFORMATION

Balance Sheet Requirement

INTEGFI is not the qualified custodian for Client funds or securities and does not require prepayment of fees of more than \$500 per Client, six (6) months or more in advance.

Financial Condition

INTEGFI does not have any financial impairment that would preclude the Firm from meeting contractual commitments to Clients.

Bankruptcy Petition

INTEGFI has not been the subject of a bankruptcy petition at any time during the last 10 years.

ITEM 19 REQUIREMENTS FOR STATE-REGISTERED ADVISERS

A. Pezhman Amini, Founder and CCO

Education:

- B.Sc. Electronics Engineering, University of Tehran, 1993-1998
- M.Sc. Electronics Engineering, University of Tehran, 1998-2000



MBA, University of California Los Angeles, 2007-2009

Business Background:

- INTEGFI, Founder and Chief Compliance Officer, 05/2025 - Present
- Northwestern Mutual, Financial Advisor, 2024 - 2025
- Individual Consultant, 2022 - 2023
- Khorshad Health, CFO, 2012 - 2023

Outside Business Activity

Pezhman Amini is also licensed as an independent insurance agent. If you elect to purchase insurance products through Pezhman in this separate capacity, he will earn a commission for selling insurance products. You are not obligated to implement the advice provided by Pezhman or to implement transactions through him in his separate capacity as an insurance agent. Mr. Amini devotes approximately 6 hours per week to this outside business. For additional information about Pezhman Amini please see Form ADV Part 2B.

Performance Based Fees

Neither INTEGFI nor any of its supervised persons is compensated in any way other than the investment advisory fees described above.

Disciplinary Disclosures:

Neither INTEGFI nor any of its management persons has been involved in one of the events listed below:

1. An award or otherwise being *found* liable in an arbitration claim alleging damages in excess of \$2,500, *involving* any of the following:
 - (a) an investment or an *investment-related* business or activity;
 - (b) fraud, false statement(s), or omissions;
 - (c) theft, embezzlement, or other wrongful taking of property;
 - (d) bribery, forgery, counterfeiting, or extortion; or
 - (e) dishonest, unfair, or unethical practices.
2. An award or otherwise being *found* liable in a civil, *self-regulatory organization*, or administrative *proceeding involving* any of the following:
 - (a) an investment or an *investment-related* business or activity;
 - (b) fraud, false statement(s), or omissions;
 - (c) theft, embezzlement, or other wrongful taking of property;
 - (d) bribery, forgery, counterfeiting, or extortion; or
 - (e) dishonest, unfair, or unethical practices.

Additional Financial Industry Relationships



INTEGFI nor INTEGFI's management persons have any additional relationship or arrangement to disclose.

