

# *Integrity Wealth Solutions*

*4725 S. Monaco Street, Suite 335*

*Denver, CO 80237*

*303.716.5777*

*www.integrity-wealth.com*

## Form ADV Part 2A – Firm Brochure

February 1, 2022

This brochure provides information about the qualifications and business practices of Integrity Wealth Solutions. Please contact Clint Thomas (*clint@integrity-wealth.com*), Owner, or Justina Welch (*justina@integrity-wealth.com*), Owner, at 303.716.5777, if you have any questions about the contents of this brochure.

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.

Additional information about Integrity Wealth Solutions is available on the Internet at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by a unique identifying number, known as an IARD number. The IARD number for Integrity Wealth Solutions is 284862. Registration as a Registered Investment Adviser does not imply a certain level of skill or training.

## **Item 2 - Material Changes**

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Since the last annual update of our firm's Form ADV Brochure, dated February 1, 2021, the following material changes have occurred:

- Our principal place of business had changed to 4725 S. Monaco Street, Suite 335 Denver, CO 80237 as of January 1, 2022.
- Item 4 has been amended to reflect current assets under management.
- Item 5 has been amended to discontinued comprehensive financial planning services for non-asset management clients.
- Item 11 has been amended to add information about when we render advice on retirement accounts, including IRAs.
- Item 14 has been amended to disclose Zoe Financial as a solicitor.

### ***Full Brochure Available***

Whenever you would like to receive a copy of our Firm Brochure, please contact us by telephone at: 303.716.5777 or by email at [info@integrity-wealth.com](mailto:info@integrity-wealth.com).

### Item 3 - Table of Contents

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Item 4 - Advisory Business	page 4
Item 5 - Fees and Compensation	page 5
Item 6 - Performance Fees and Side by Side Management	page 7
Item 7 - Types of Clients	page 7
Item 8 - Methods of Analysis, Investment Strategies, and Risk of Loss	page 7
Item 9 - Disciplinary Information	page 8
Item 10 - Other Financial Industry Activities and Affiliations	page 8
Item 11 - Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	page 8
Item 12 - Brokerage Practices	page 9
Item 13 - Review of Accounts	page 10
Item 14 - Client Referrals and Other Compensation	page 10
Item 15 - Custody	page 11
Item 16 - Investment Discretion	page 11
Item 17 - Voting Client Securities	page 11
Item 18 - Financial Information	page 12

#### **Item 4 - Advisory Business**

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Integrity Wealth Solutions (IWS) has been providing wealth management consulting services to clients since August 2016. The principal owners are Clint Thomas and Justina Welch. We have no public or privately-owned affiliated companies.

IWS provides portfolio management and financial planning services, including investment advice to individuals and families and ERISA retirement plans. Portfolio management services include developing an investment policy statement, building portfolio recommendations, and implementing these recommendations at a third-party custodian (see *Custody*) by entering purchase and sell orders on client's behalf. Portfolio management services also include the ongoing monitoring of the investment portfolio, including quarterly performance reporting, asset allocation analysis, rebalancing and tax-loss harvesting recommendations. Investment recommendations are primarily limited to open-end mutual funds and exchange-traded funds and help clients with existing positions in individual stocks. We typically do not advise our clients to invest in individual stocks and bonds.

All client portfolios are customized and built for each individual relationship, although many clients will hold similar securities and allocations. Although we will try and accommodate client's requested portfolio restrictions to the best of our ability, we may not be able to due to the nature of the mutual funds and ETFs in the portfolio. The portfolio construction process begins with a discussion of the client's goals and risk tolerance to determine a suitable long-term investment portfolio. We do not participate in wrap fee programs.

Financial planning services include retirement income planning, asset allocation/portfolio evaluation, education funding planning, investment selection, income tax planning, risk management, multi-generational financial planning, and general estate planning. If applicable, we will incorporate assets held outside of our firm into the comprehensive financial planning process. Examples of these types of assets could be, but are not limited to, 401(k), 403(b), and 529 accounts.

IWS can engage a client in tax planning and estate planning discussions, although the firm does not prepare tax returns and does not draft estate plan documents. The firm can work in concert with tax accountants and estate attorneys to assist the client in determining the most proper plan regarding their income taxes and various estate planning concerns.

For asset allocation and investment selection, IWS treats each client relationship as separate and unique. Portfolio allocations of cash, fixed income, and equity mutual funds and ETFs and other types of investments are determined on a client-by-client basis, based on discussions with each client as to their tolerance for risk. Investment selection is also customized to utilize investments that may offer more tax-efficiency (municipal bonds or exchange-traded funds, for example) for non-retirement accounts, depending on the client's current income tax situation.

IWS provides ongoing monitoring and standard reporting on each client's investment portfolio. Additionally, IWS will schedule an annual financial planning meeting to review the client's overall situation and update portions of the financial plan, as required. In addition to reviewing portfolio composition and performance, these meetings typically include tax planning, retirement planning, risk management and/or estate planning advice and consultation.

IWS portfolio management services may provide investment advice to some of its clients with held away assets, such as annuities, 529 plans, 401(k), 403(b), TSP, or other employer retirement plans. This service allows IWS to incorporate these assets into the client's entire asset allocation, which thereby helps create a more diversified portfolio tailored to the client's goals and risk tolerance. Please note, we will not execute any trades in these types of accounts, trading in these accounts will be the responsibility of the client.

IWS provides fiduciary services, including 3(21) and 3(38) fiduciary services, to ERISA retirement plans, including profit sharing 401(k) plans and defined benefit plans. These services include investment plan offering review and selection, model portfolio development, monitoring and management and regular compliant reporting to plan sponsors. Reporting includes plan benchmarking and 408(b)(2) fee and service disclosure.

IWS hereby acknowledges that it is a "fiduciary" when the firm's services are subject to the provisions of ERISA of 1974, as amended.

As of December 31, 2021, IWS manages \$176,047,943 assets under management on a discretionary basis and \$3,470,131 assets under management on a non-discretionary basis.

## Item 5 - Fees and Compensation

IWS compensation depends on the type of advisory service we are performing. Please review the fee and compensation information below.

### Asset Management

IWS annual fee is calculated in accordance with the fee schedule below. Asset management services, including financial planning and portfolio management, are provided on an active basis for accounts with an appropriate minimum value, typically \$500,000.

Assets Managed	Annualized Fee	Quarterly Fee
\$500,001 - \$1,000,000	\$5,000	\$1,250
\$1,000,001 - \$3,000,000	\$7,500	\$1,875
\$3,000,001 - \$6,000,000	\$10,000	\$2,500
\$6,000,001 - \$10,000,000	\$15,000	\$3,750
\$10,000,001 - \$15,000,000	\$25,000	\$6,250
\$15,000,001 - \$25,000,000	\$40,000	\$10,000
\$25,000,001 - \$40,000,000	\$60,000	\$15,000
\$40,000,001 - \$55,000,000	\$80,000	\$20,000
\$55,000,001 - \$70,000,000	\$100,000	\$25,000
\$70,000,001 - \$85,000,000	\$120,000	\$30,000
\$85,000,001 - \$100,000,000	\$140,000	\$35,000
\$100,000,001 and above	Negotiable	Negotiable

***IWS will accept asset management relationships under \$500,000 in billable assets.*** For accounts that are within this range there is an annual fee of 1% charged quarterly determined based on the value of the assets at the end of each calendar quarter. For relationships under \$500,000, financial planning services may be billed separately on a per-project basis.

Fees for asset management will be pro-rated to the end of the initial calendar quarter and will be charged at the beginning of each calendar quarter (in advance) thereafter based on the value of billable assets on the last business day of prior calendar quarter end.

Clients terminating their contract with IWS within the first five days are entitled to a full refund. Should a client terminate the relationship with IWS outside the five-day window, the unearned portion of the asset management fee will be refunded.

Clients may elect to pay this fee directly or have the quarterly charge deducted from investment accounts. Please refer to Custody on Page 11 for information regarding fees deducted from investment accounts.

For Clients that elect direct invoicing - IWS will invoice Client on a quarterly basis at the beginning of each calendar quarter. Management fees will be due within 30 days of invoice billing date. Management fees not paid after 45 days from the beginning of the billable quarter may result in the termination of relationship with IWS.

Clients where IWS is providing asset management services on held away assets, clients may either pay our asset management fee through a deduction from a taxable account (e.g., non-IRA or other non-retirement investment account) held at the custodian of record or through direct invoicing.

IWS asset management fee and account minimums are negotiable under certain circumstances.

Clients may incur fees from the custodian selected to provide services related to record keeping, tax reporting and statement production. These fees may include IRA and retirement account annual fees, nominal trade ticket charges or banking fees. Clients will be subject to the annual operating expenses of the mutual funds and ETFs themselves. Detailed information on mutual fund and ETFs expenses are contained in the prospectus for each fund or ETF, which is delivered to clients by the custodian. No portion of these fees is retained by or remitted to IWS. See *Brokerage Practices*.

### **Financial Planning Services**

For new asset management clients with relationships under \$500,000, the initial financial plan may be billed separately on a one-time basis. After the initial plan, ongoing financial planning services are included in the asset management fee. Asset management clients with relationships above \$500,000, the financial planning services are included in the asset management fee as outline in the table above.

The typical fee for planning service is \$3,000; however, this fee can range from \$1,000 to \$5,000, depending upon the scope and complexity of the work to be performed.

IWS no longer offers stand-alone or “plan only” financial planning services to new clients after January 1, 2022, who do not engage us for asset management services. IWS will continue to honor past financial plan only or retainer engagements that were in place prior to January 1, 2022. At IWS discretion, IWS may accept one-time project based financial planning on a fixed fee basis.

IWS will invoice Client upon completion and delivery of financial plan and fees will be due to IWS within 30 days. Clients may terminate the agreement in writing and any earned portion of the fee, based upon the advisor's estimate of percentages of work completed, is due at the time of notice of termination.

IWS may also provide advice on insurance (disability, long-term care, and life) and annuity products to its clients via a relationship with insurance providers. IWS compensation is covered via the client's annual asset management fee or financial planning fee. No additional compensation is received from the insurance provider.

### **Retirement Plan Services**

Retirement Plan "Consulting" fees for company sponsored retirement plans are generally based on plan size and services rendered. Fees are determined on a case-by-case basis and typically range from 0.20% to 1.00% or an agreed upon fixed fee.

Consulting fees will be pro-rated to the end of the initial calendar quarter and will be charged at the beginning of each calendar quarter (in advance) thereafter based on the value of billable assets on the value of billable assets on the last day of calendar quarter. Consulting fees are either deducted from plan assets or remitted directly to IWS based on Client's election.

Clients terminating their contract with IWS within the first five days are entitled to a full refund. Should a client terminate the relationship with IWS outside the five-day window, the unearned portion of the consulting fee will be refunded.

### **Item 6 - Performance-Based Fees and Side-By-Side Management**

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IWS does not charge performance-based fees.

### **Item 7 - Types of Clients**

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Our firm works primarily with individuals and families but also serves retirement plans, foundations, endowments, and other non-profit organizations.

IWS current minimum relationship size is \$500,000 of investable assets. Exceptions to this minimum are allowed but must receive the approval of one of the principal officers of the firm.

### **Item 8 - Methods of Analysis, Investment Strategies, and Risk of Loss**

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IWS' core investment philosophy is built on the foundation of portfolio diversification and the client's individual asset allocation with the proper cash, fixed income, and equity mutual funds and ETFs based on their individual risk tolerance. Our investment strategy begins with a general long-term acceptance of the Efficient Market Hypothesis, which states that the primary driver of a portfolio's risk and return characteristics is determined by asset allocation, and not security selection. We will primarily utilize a passive investment strategy but will incorporate active managers when deemed necessary. The primary vehicles recommended to IWS clients are mutual funds and exchange-traded funds.

IWS believes that an accurate prediction can never be made about which asset classes will outperform going forward, we take a disciplined approach by allocating to many different asset classes, and then using rebalancing to bring the portfolio back into alignment not only in terms of the mix among cash, fixed income, and equity

mutual funds and ETFs, but also keeping the proper style balance between large cap and small cap equity, growth versus value, etc.

And, as with any stock-based investment, mutual funds, including index mutual funds, carry the risk of losses. While we can reduce company-specific risk through diversification, eliminate manager-risk with passive portfolios and reduce overall portfolio volatility with a broad mix of equity mutual funds and ETFs, fixed income, and other assets, we cannot eliminate the risk of fluctuation that comes with investing in stocks and bonds. It is always possible in any given week, month, or year that an investor's portfolio value could be less than the previous period. For the client that chooses to have a portfolio more heavily weighted in stock investments versus bond investments, he/she needs to be prepared for a potential drop in the value of the portfolio of more than 20% during extremely volatile market conditions. The Efficient Market Hypothesis dictates that it is this *market risk* that offers investors potential long-term rewards, so we aim to reduce other previously mentioned risks wherever possible.

### **Item 9 - Disciplinary Information**

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Neither Clint Thomas or Justina Welch nor any employees of IWS have ever been convicted of, pled guilty or no contest to any felony or misdemeanor in a criminal or civil action in any foreign or domestic court. Neither Clint Thomas or Justina Welch nor any employees of IWS have ever been part of a proceeding before the SEC or any other industry regulatory agency. Neither Clint Thomas or Justina Welch nor any employees of IWS have ever been part of a self-regulatory organization's proceeding.

### **Item 10 - Other Financial Industry Activities and Affiliations**

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Neither Clint Thomas or Justina Welch nor any employees of IWS are registered or applying to register as a custodian or a registered representative of a custodian, nor a futures commission merchant, commodity pool operator, commodity trading advisor.

Neither Clint Thomas or Justina Welch nor any employee of IWS has a relationship with a broker dealer, municipal securities dealer, government securities dealer or broker, investment company, outside investment adviser, banking or thrift institution, accounting firm, law firm, insurance agency, pension consultant, real estate broker, sponsor, or syndicator of limited partnerships.

IWS receives no compensation from outside investment advisers and receives no compensation other than the asset management or financial planning fee paid by the firm's clients.

Clint Thomas and Justina Welch are life and health insurance licensed in the state of Colorado. Clint Thomas and Justina Welch are insurance licensed for educational planning purposes but do not intend to sell and receive additional compensation for insurance products. This creates a conflict of interest as the firm has an incentive to recommend insurance to earn a commission. IWS will always act in the client's best interest and client has the right to work with an insurance professional of their choosing.

### **Item 11 - Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

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As a Registered Investment Adviser, IWS has a fiduciary duty to its clients. In the simplest of terms this means that our first obligation is to put the client's needs above all other interests or conflicts. IWS takes our fiduciary duty very

seriously and has built our business model around our obligation to minimize conflicts of interest with our clients and to truly make recommendations that are in their best interests.

IWS' owner and employees will adhere to all federal and state securities laws and regulations. All IWS related persons will be held to the highest standard of conduct and shall not withhold pertinent information from clients regarding securities recommendations, act to deceive or defraud any client or outside party, or otherwise partake in any activity with the intent to deceive or defraud any regulatory body, government office or client.

IWS' owner and employees may buy or sell securities for themselves, which are also recommended to clients, which represents a conflict of interest. To avoid conflicts of interest, IWS monitors and supervises the personal securities transactions of all employees and its owners. Monitoring is conducted by Justina Welch, Chief Compliance Officer of IWS. IWS retains records of all securities transactions conducted by employees and owners. For compliance purposes with regulations, all employees and the owner are considered "access persons" whose transactions will be monitored.

As a matter of principle IWS' owner and employees are to withhold public comment regarding advice on individual securities, as to avoid conflicts of interest when these comments may enrich the IWS associated person.

When we provide investment advice to you regarding your retirement plan account or individual retirement account (IRA), we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

\* It should be noted that the fiduciary duties enumerated above do not differ from those we observe in all our advisory activities.

## **Item 12 - Brokerage Practices**

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IWS has custodial relationships with TD Ameritrade Institutional ("TDAI"), a division of TD Ameritrade, Inc. member FINRA/SIPC and Charles Schwab & Co., Inc. ("Schwab"), member FINRA/SIPC.

IWS often recommends the implementation of any investment recommendation be completed through one of IWS custodial relationships - TD Ameritrade or Schwab. While TD Ameritrade and Schwab may not be the lowest cost implementation option, IWS feels that, due to the services that TD Ameritrade and Schwab provide to its clients and to IWS, this approach will result in the best service to the client. IWS can elect to change its broker/dealer affiliation at any time should it feel that TD Ameritrade or Schwab is not providing an adequate level of service for the associated costs. Moreover, IWS feels that implementing all investment recommendations through a single source provides an efficiency advantage and, consequently, better service and reporting at a lower cost.

IWS, as a matter of policy and practice, does not utilize research, research-related products and other services obtained from custodian, or third parties, on a soft dollar basis. Soft dollars generally refer to arrangements whereby a discretionary investment adviser can receive research, research-related or execution services from a custodian or third-party provider, in addition to the execution of transactions, in exchange for using the custodian for asset management client accounts. Because the advisors have an incentive to recommend TD Ameritrade or Schwab for custody this creates a conflict of interest. IWS will always act in the best interest of clients.

IWS does not receive client referrals from any custodians.

IWS relies on TD Ameritrade or Schwab, as the custodian for client's securities', to provide best execution of individual stock and bond transactions. TD Ameritrade and Schwab may not be the least expensive in the industry, however, IWS believes that our clients receive very competitive pricing/bids for individual stock and bond trades. Best execution practices are reviewed on an on-going basis to determine if the firm's policy is implemented properly with regards to timely execution and commission discounts (based on time and work spent for a client's transaction request). This also includes looking at other resources (immediately prior to the transaction), such as real-time stock quotes from MSN and/or CNN-FN websites.

We manage individual portfolios and not "model" portfolios. However, we will aggregate ETF trades when possible, in order to obtain best execution. If IWS decides to purchase or sell the same security for several clients at approximately the same time, allocations are done in an equitable fashion, typically on a pro rata basis.

### **Item 13 - Review of Accounts**

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Clint Thomas and Justina Welch, Owners of IWS, reviews each client's portfolio no less frequently than once per quarter. At the end of each quarter IWS generates an updated Asset Allocation analysis and trailing period performance report for all investment management clients. The Asset Allocation report is then compared to the client's signed Investment Policy Statement to analyze the variance from the target portfolio allocation. Additionally, performance is compared to broad market averages to ensure that the client is capturing as much of the long-term return of the market as possible. Clients will also receive monthly statements from their custodian (i.e., TD Ameritrade or Schwab). Accounts are also reviewed during an annual portfolio review meeting with the firm's clients.

### **Item 14 - Client Referrals and Other Compensation**

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IWS engages independent solicitors to provide client referrals. If a client is referred to us by a solicitor, this practice is disclosed to the client in writing by the solicitor and IWS pays the solicitor out of its own funds—specifically, IWS generally pays the solicitor a portion of the advisory fees earned for managing the capital of the client or investor that was referred. The use of solicitors is strictly regulated under applicable federal and state law. IWS' policy is to fully comply with the requirements of Rule 206(4)-3, under the Investment Advisers Act of 1940, as amended, and similar state rules, as applicable.

IWS may receive client referrals from Zoe Financial, Inc through its participation in Zoe Advisor Network (ZAN). Zoe Financial, Inc is independent of and unaffiliated with IWS and there is no employee relationship between them. Zoe Financial established the Zoe Advisor Network as a means of referring individuals and other investors seeking fiduciary personal investment management services or financial planning services to independent investment

advisors. Zoe Financial does not supervise IWS and has no responsibility for IWS' management of client portfolios or IWS' other advice or services. IWS pays Zoe Financial an on-going fee for each successful client referral. This fee is usually a percentage of the advisory fee that the client pays to IWS ("Solicitation Fee"). IWS will not charge clients referred through Zoe Advisor Network any fees or costs higher than its standard fee schedule offered to its clients. For information regarding additional or other fees paid directly or indirectly to Zoe Financial Inc, please refer to the Zoe Financial Disclosure and Acknowledgement Form.

IWS does not compensate existing clients or other outside professionals (such as CPAs, attorneys, etc.) for client referrals.

### **Item 15 - Custody**

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IWS does not accept physical custody of client funds or securities but are deemed to have constructive custody where IWS has authorization to deduct fees from client accounts.

For client accounts in which IWS is authorized to instruct the custodian to debit their advisory fee:

- i. The client will provide written authorization to IWS, permitting IWS to be paid directly for the client's accounts held by the custodian.
- ii. IWS will send the client a written invoice itemizing the fee, including any formula used to calculate the fee, the date range covered by the fee and the amount of assets under management on which the fee was based.
- iii. The custodian will send at least quarterly statements to the client showing all disbursements for the account, including the amount of the advisory fee.

Clients should receive at least quarterly statements from the custodian that holds and maintains client's investment assets. Clients of IWS are encouraged to carefully review such statements and compare official custodial records to the account reports and invoices that IWS may provide to the client and notify IWS of any discrepancies. IWS reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain strategies.

### **Item 16 - Investment Discretion**

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As outlined in our Asset Management Agreement, IWS requires discretionary authority over clients' investment portfolio under our management, including the type of security and number of shares. Having discretion over mutual fund and ETF trades allows us to be more flexible for those clients who prefer not to discuss each trade with us.

### **Item 17 - Voting Client Securities**

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IWS does not proxy vote for our clients' investment positions. Clients will receive proxy solicitations directly from the custodian. We are happy to discuss these solicitations with our clients.

Further, we will have no power, authority, responsibility, or obligation to take any action with regard to any claim or potential claim in any bankruptcy proceeding, class action securities litigation or other litigation or proceeding relating to securities held at any time in a client account, including without limitation, to file proofs of claim or other

documents related to such proceeding, or to investigate, initiate, supervise, or monitor class action or other litigation involving client assets.

### **Item 18 - Financial Information**

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IWS does not collect asset management fees for a period of greater than one quarter, is not required to disclose a balance sheet. IWS has no outstanding liabilities or financial impairments that would inhibit our ability to provide promised services to clients. No owner or employee of IWS has ever filed for bankruptcy.

Part 2B of Form ADV Brochure Supplement for:

**Clint Thomas**

Integrity Wealth Solutions LLC  
4725 S. Monaco Street, Suite 335  
Denver, CO 80237  
Phone: 303.716.5777  
clint@integrity-wealth.com

February 1, 2022

This brochure supplement provides information about Clint Thomas that supplements the Integrity Wealth Solutions Part 2A of form ADV Firm Brochure. You should have received a copy of that brochure, if you did not or have questions on the brochure, please contact us at 303.716.5777 and a copy will be provided to you.

Additional information about Clint is available at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by a unique identifying number, known as a CRD number. The CRD number for Clint Thomas is 4310393.

**Educational Background and Business Experience**

Name: Clint Thomas

DOB: 10/27/1975

## Education and Training

Bachelor of Business Administration, Lubbock Christian University

Master of Science in Finance, University of Denver

Colorado Life and Health Insurance Licenses

### CERTIFIED FINANCIAL PLANNER™ (CFP®)

I am certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). Therefore, I may refer to myself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and I may use these and CFP Board's other certification marks (the "CFP Board Certification Marks"). CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold CFP® certification. You may find more information about CFP® certification at [www.cfp.net](http://www.cfp.net).

CFP® professionals have met CFP Board's high standards for education, examination, experience, and ethics. To become a CFP® professional, an individual must fulfill the following requirements:

- **Education** – Earn a bachelor's degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirement through other qualifying credentials.
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual's ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.
- **Experience** – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
- **Ethics** – Satisfy the *Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement* and agree to be bound by CFP Board's *Code of Ethics and Standards of Conduct* ("Code and Standards"), which sets forth the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements to remain certified and maintain the right to continue to use the CFP Board Certification Marks:

- **Ethics** – Commit to complying with CFP Board's *Code and Standards*. This includes a commitment to CFP Board, as part of the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial advice and financial planning. CFP Board may sanction a CFP® professional who does not abide by this commitment, but CFP Board does not guarantee a CFP®

professional's services. A client who seeks a similar commitment should obtain a written engagement that includes a fiduciary obligation to the client.

- **Continuing Education** – Complete 30 hours of continuing education hours every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the *Code and Standards*.

### **Business Background**

From August 2016 to present, Clint is the Co-Owner of Integrity Wealth Solutions.

From 2003 to 2016, Clint was a Financial Consultant with M.J. Smith and Associates.

From 2000 to 2002, Clint was a Financial Representative with Merrill Lynch.

### **Disciplinary Information**

Clint Thomas has no record of any disciplinary event with the SEC, any other federal regulatory agency, state regulatory agency or foreign financial regulatory authority.

### **Other Business Activities**

Clint Thomas holds Colorado health and life residential producer license. Clint does not intend to sell insurance but wants to be educated for planning purposes.

### **Additional Compensation**

Clint Thomas receives no additional compensation for any investment related services outside of the work performed for Integrity Wealth Solutions. Clint is insurance licensed but does not intend to sell and receive additional compensation for insurance products.

### **Supervision**

The individual responsible for monitoring Clint Thomas' advisory activities is Justina Welch, Co-Owner, Integrity Wealth Solutions. Justina Welch reviews all investment activities of Integrity Wealth Solutions and will adhere to the firm's policies and procedures. Justina Welch may be reached at 303.716.5777.

Part 2B of Form ADV Brochure Supplement for:

**Justina Welch**

Integrity Wealth Solutions  
4725 S. Monaco Street, Suite 335  
Denver, CO 80237  
Phone: 303.716.5777  
justina@integrity-wealth.com

February 1, 2022

This brochure supplement provides information about Justina Welch that supplements the Integrity Wealth Solutions Part 2A of form ADV Firm Brochure. You should have received a copy of that brochure, if you did not or have questions on the brochure, please contact us at 303.716.5777 and a copy will be provided to you.

Additional information about Justina is available at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by a unique identifying number, known as a CRD number. The CRD number for Justina Welch is 3276656.

**Educational Background and Business Experience**

Name: Justina Welch

DOB: 2/3/1976

## **Education and Training**

Bachelor of Science, Business Administration, Finance - University of Colorado

Master of Business Administration, Corporate Financial Management - University of Colorado

Colorado Life and Health Insurance Licenses

### CERTIFIED FINANCIAL PLANNER™ (CFP®)

I am certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). Therefore, I may refer to myself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and I may use these and CFP Board's other certification marks (the "CFP Board Certification Marks"). CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold CFP® certification. You may find more information about CFP® certification at [www.cfp.net](http://www.cfp.net).

CFP® professionals have met CFP Board's high standards for education, examination, experience, and ethics. To become a CFP® professional, an individual must fulfill the following requirements:

- **Education** – Earn a bachelor's degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirement through other qualifying credentials.
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual's ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.
- **Experience** – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
- **Ethics** – Satisfy the *Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement* and agree to be bound by CFP Board's *Code of Ethics and Standards of Conduct ("Code and Standards")*, which sets forth the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements to remain certified and maintain the right to continue to use the CFP Board Certification Marks:

- **Ethics** – Commit to complying with CFP Board's *Code and Standards*. This includes a commitment to CFP Board, as part of the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial advice and financial planning. CFP Board may sanction a CFP® professional who does not abide by this commitment, but CFP Board does not guarantee a CFP® professional's services. A client who seeks a similar commitment should obtain a written engagement

that includes a fiduciary obligation to the client.

- **Continuing Education** – Complete 30 hours of continuing education hours every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the *Code and Standards*.

### **Business Background**

From August 2016 to present, Justina is a Co-Owner of Integrity Wealth Solutions.

From 2012 to July 2016, Justina was a Financial Consultant with M.J. Smith & Associates.

From 2011 to 2012, Justina was an Investment Counselor with Fisher Investments.

From 1996 to 2011, Justina was the Vice President of Hofgard & Co, Inc. and Hofgard Insurance, a financial services consulting firm.

### **Disciplinary Information**

Justina Welch has no record of any disciplinary event with the SEC, any other federal regulatory agency, state regulatory agency or foreign financial regulatory authority.

### **Other Business Activities**

Justina Welch holds Colorado health and life residential producer license. Justina does not intend to sell insurance but wants to be educated for planning purposes.

### **Additional Compensation**

Justina Welch receives no additional compensation for any investment related services outside of the work performed for Integrity Wealth Solutions. Justina is insurance licensed but does not intend to sell and receive additional compensation for insurance products.

### **Supervision**

The individual responsible for monitoring Justina Welch's advisory activities is Justina Welch, Co-Owner, Integrity Wealth Solutions. Justina Welch reviews all investment activities of Integrity Wealth Solutions. Justina Welch may be reached at 303.716.5777.