



*a Registered Investment Adviser*

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This brochure provides information about the qualifications and business practices of Invst, LLC (hereinafter “Invst” or the “Firm”). If you have any questions about the contents of this brochure, please contact the Firm at the telephone number listed above. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any state securities authority. Additional information about the Firm is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The Firm is a registered investment adviser. Registration does not imply any level of skill or training.

## Item 2. Material Changes

In this Item, Invst is required to discuss any material changes that have been made to the brochure since the last annual amendment dated March 22, 2022. There has been one material change. Items 4, 5, 7 8, 10, 11, 13 and 16 have been updated to reflect an arrangement that Invst and its principal have with KennMar INVST Diversified Income Fund, LLC--a private investment fund—that will be launching in the near future.

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## Item 4. Advisory Business

Invst offers a variety of advisory services—which include financial planning, consulting, and investment management services—with a focus on educating, guiding and counseling clients toward reaching their full financial potential. Prior to Invst rendering any of the advisory services described herein, clients are required to enter into one or more written agreements with Invst setting forth the relevant terms and conditions of the advisory relationship (the “Advisory Agreement”).

Invst or its personnel will provide asset management and investment advisory services to a new fund managed by Triade Holdings LLC. Triade Holdings LLC is the Managing Member to KennMar INVST Diversified Income Fund, LLC—a private investment fund formed to invest in and manage real estate. The detailed terms, strategies, and risks applicable to investors in the fund are described in the fund’s organizational and offering documents.

Invst has been registered as an investment adviser since February 2016 and is wholly owned by Scott A. Jarred. As of December 31, 2022, Invst had \$961,070,072 of assets under management, of which \$784,100,428 was managed on a discretionary basis and \$176,969,644 was managed on a non-discretionary basis. Invst provides advisory services through its investment advisor representatives (“IARs”) and Supervised Persons. Certain IARs and Supervised Persons have their own business entities whose trade names and logos which they use in marketing the services they provide through the Firm. Such business entities are generally owned by one or more IARs and/or Supervised Persons, not the Firm. Invst may also maintain “fictitious names” and/or “doing business as” names which IARs and/or Supervised Persons use in marketing the services they provide through the Firm. IARs and Supervised Persons are under the supervision of Invst, and the advisory services of the IAR are provided through Invst.

While this brochure generally describes the business of Invst, certain sections also discuss the activities of its Supervised Persons, which refer to the Firm’s officers, partners, directors (or other persons occupying a similar status or performing similar functions), employees or any other person who provides investment advice on Invst’s behalf and is subject to the Firm’s supervision or control.

### Financial Planning and Consulting Services

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Invst offers clients a broad range of financial planning and consulting services, which include any or all of the following functions:

- Cash Flow Forecasting
- Trust and Estate Planning
- Financial Reporting
- Investment Consulting
- Business Consulting
- Tax Planning
- Insurance Planning
- Retirement Planning
- Charitable Giving
- Distribution Planning

While each of these services is available on a stand-alone basis, certain of them can also be rendered in conjunction or in addition to investment portfolio management as part of a comprehensive wealth management engagement (described in more detail below). A comprehensive wealth management engagement may include an upfront or recurring financial planning fee, and an advisory fee, and an investment management fee. Any of the fees charged can be presented as a fixed fee and/or a fee based on assets under management as agreed to in the Advisory Agreement.

In performing these services, Invst is not required to verify any information received from the client or from the client's other professionals (e.g., attorneys, accountants, etc.) and is expressly authorized to rely on such information. Invst recommends certain clients engage the Firm for additional related services, its Supervised Persons in their individual capacities as insurance agents or registered representatives of a broker-dealer and/or other professionals to implement its recommendations. In addition, the Firm entered into an agreement with two third-party providers—Pendella Technologies Inc.—to implement, deliver and maintain a platform that facilitates marketing and sales functions and enables existing and prospective customers and clients to purchase individual insurance products; and GJ Insurance Group, an independent auto, home, life, commercial and benefits insurance agency in Carmel, Indiana. The Firm receives a portion of the commissions as further described in Item 10 and 14.

Clients are advised that a conflict of interest exists for the Firm to recommend that clients engage Invst or its affiliates to provide (or continue to provide) additional services for compensation, including investment management services. Clients retain absolute discretion over all decisions regarding implementation and are under no obligation to act upon any of the recommendations made by Invst under a financial planning or consulting engagement. Clients are advised that it remains their responsibility to promptly notify the Firm of any change in their financial situation or investment objectives for the purpose of reviewing, evaluating or revising Invst's recommendations and/or services.

### **Investment Management Services**

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Invst manages client investment portfolios on a discretionary basis. In addition, Invst provides clients with wealth management services which includes a broad range of comprehensive financial planning and consulting services as well as discretionary management of investment portfolios. Clients can engage the Firm directly or through an unaffiliated registered investment adviser or other financial advisor ("Delegating Advisor"). Clients engaged through a Delegating Advisors are referred to herein as "Sub-Advisory Clients."

Invst primarily allocates client assets among various exchange-listed securities, mutual fund shares, corporate debt, exchange-traded funds ("ETFs"), US government securities, real estate investment trusts ("REITs"), independent investment managers ("Independent Managers") and certificates of deposit in accordance with their stated investment objectives. Where appropriate, the Firm also provides advice about any type of legacy position or other investment held in client portfolios, however, clients should not assume that these assets are being continuously monitored or otherwise advised on by the Firm unless specifically

agreed upon. Clients can engage Invst to manage and/or advise on certain investment products that are not maintained at their primary custodian, such as variable life insurance and annuity contracts and assets held in employer sponsored retirement plans and qualified tuition plans (i.e., 529 plans). In these situations, Invst directs or recommends the allocation of client assets among the various investment options available with the product. These assets are generally maintained at the underwriting insurance company, or the custodian designated by the product's provider.

Invst tailors its advisory services to meet the needs of its individual clients and seeks to ensure, on a continuous basis, that client portfolios are managed in a manner consistent with those needs and objectives. Invst consults with clients on an initial and ongoing basis to assess their specific risk tolerance, time horizon, liquidity constraints and other related factors relevant to the management of their portfolios. Clients are advised to promptly notify Invst if there are changes in their financial situation or if they wish to place any limitations on the management of their portfolios. Clients can impose reasonable restrictions or mandates on the management of their accounts if Invst determines, in its sole discretion, the conditions would not materially impact the performance of a management strategy or prove overly burdensome to the Firm's management efforts. Notwithstanding the foregoing, where the Firm is engaged by a Delegating Advisor on behalf of a Sub-Advisory Client, Invst provides such management through the Program consistent with each Sub-Advisory Client's individual stated goals, objectives, and risk tolerances, as provided to Invst by the Delegating Advisor.

Invst also provides clients an online portal ("Client Portal") through which clients can login and aggregate and monitor accounts managed by the Firm and their other personal accounts, prepare projections, among other services.

### **Retirement Plan Consulting Services**

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Invst provides various consulting services to qualified employee benefit plans and their fiduciaries. This suite of institutional services is designed to assist plan sponsors in structuring, managing, and optimizing their corporate retirement plans. Each engagement is individually negotiated and customized, and includes any or all the following services:

- Plan Design and Strategy
- Plan Review and Evaluation
- Executive Planning & Benefits
- Investment Selection and Management
- Plan Fee and Cost Analysis
- Plan Committee Consultation
- Fiduciary and Compliance
- Participant Education

As disclosed in the Advisory Agreement, certain of the foregoing services are provided by Invst as a fiduciary under the Employee Retirement Income Security Act of 1974, as amended ("ERISA"). In accordance with ERISA Section 408(b)(2), each plan sponsor is provided with a written description of

Invst's fiduciary status, the specific services to be rendered and all direct and indirect compensation the Firm reasonably expects under the engagement.

## **Use of Independent Managers**

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As mentioned above, Invst selects certain Independent Managers to actively manage a portion of its clients' assets. The specific terms and conditions under which a client engages an Independent Manager may be set forth in a separate written agreement with the designated Independent Manager. In addition to this brochure, clients may also receive the written disclosure documents of the respective Independent Managers engaged to manage their assets.

Invst evaluates a variety of information about Independent Managers, which includes the Independent Managers' public disclosure documents, materials supplied by the Independent Managers themselves and other third-party analyses it believes are reputable. To the extent possible, the Firm seeks to assess the Independent Managers' investment strategies, past performance and risk results in relation to its clients' individual portfolio allocations and risk exposure. Invst also takes into consideration each Independent Manager's management style, returns, reputation, financial strength, reporting, pricing and research capabilities, among other factors.

Invst continues to provide services relative to the discretionary selection of the Independent Managers. On an ongoing basis, the Firm monitors the performance of those accounts being managed by Independent Managers. Invst seeks to ensure the Independent Managers' strategies and target allocations remain aligned with its clients' investment objectives and overall best interests.

## **Participant Account Management**

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We use a third-party platform to facilitate management of held away assets such as defined contribution plan participant accounts, with discretion. The platform allows us to avoid being considered to have custody of Client funds since we do not have direct access to Client log-in credentials to affect trades. We are not affiliated with the platform in any way and receive no compensation from them for using their platform. A link will be provided to the Client allowing them to connect an account(s) to the platform.

Once Client account(s) is connected to the platform, Adviser will review the current account allocations. When deemed necessary, Adviser will rebalance the account considering client investment goals and risk tolerance, and any change in allocations will consider current economic and market trends. The goal is to improve account performance over time, minimize loss during difficult markets, and manage internal fees that harm account performance. Client account(s) will be reviewed at least quarterly, and allocation changes will be made as deemed necessary.

## Item 5. Fees and Compensation

Invst offers services on a fee basis, which includes fixed fees, as well as fees based upon assets under management. Additionally, certain of the Firm's Supervised Persons, in their individual capacities, offers securities brokerage services and/or insurance products under a separate commission-based arrangement.

### **Financial Planning and Consulting Fees**

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Invst charges a fixed or annual recurring fee for providing financial planning and consulting services under a stand-alone engagement. These fees are negotiable. Fixed fees range from \$500 to \$200,000. Recurring fees can vary depending on the size and composition of client's financial planning and consulting requirements and the individuals providing the services and can be charged as assets under management or fixed annual fees. Fees charged based on assets under advisement are prorated and collected monthly, in arrears, based upon the market value of the average daily account balance. For the initial period of an engagement, the fee is calculated on a pro rata basis. In the event the advisory agreement is terminated, the fee for the final billing period is prorated through the effective date of the termination and the outstanding or unearned portion of the fee is charged or refunded to the client, as appropriate. This fee varies between 10 and 200 basis points (0.10% – 2.00%).

The terms and conditions of the financial planning and/or consulting engagement are set forth in the Advisory Agreement. For fixed fees, Invst generally requires payment or payment plan upon execution of the Advisory Agreement. The Firm does not, however, take receipt of \$1,200 or more in prepaid fees in excess of six months in advance of services rendered. The annual fee is prorated and monthly, in arrears, based upon the market value of the average daily account balance. For the initial period of an engagement, the fee is calculated on a pro rata basis. In the event the advisory agreement is terminated, the fee for the final billing period is prorated through the effective date of the termination and the outstanding or unearned portion of the fee is charged or refunded to the client, as appropriate.

If the client engages the Firm for additional investment advisory services, Invst 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.



### Investment Management Fees

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Invst offers investment management services for an annual fee based on the amount of assets under the Firm's management. The annual fee varies depending upon the size and composition of a client's portfolio and the type of services rendered. This management fee varies between 10 and 100 basis points (0.10% – 1.00%).

For Sub-Advisory Clients, this management fee generally varies between 20 and 75 basis points (0.20 % - 0.75%), depending on amount of assets Invst is managing on behalf of the Delegating Advisor. Sub-Advisory Clients incur fees related to both Invst's sub-advisory services and the on-going services provided by the Delegating Advisor. Such fees may be higher than a Sub-Advisory client would otherwise pay in the event the engaged Invst directly.

The annual fee is prorated and monthly, in arrears, based upon the market value of the average daily account balance. For the initial period of an engagement, the fee is calculated on a *pro rata* basis. In the event the advisory agreement is terminated, the fee for the final billing period is prorated through the effective date of the termination and the outstanding or unearned portion of the fee is charged or refunded to the client, as appropriate.

Investment management fees are generally directly debited on a pro rata basis from client account. One exception for this is directly managed held-away accounts, such as 401(k)'s. As it is impossible to directly debit the fees from these accounts, those fees will be assigned to the client's taxable accounts on a pro-rata basis. If the client does not have a taxable account, those fees will be billed directly to the client.

Accounts initiated or terminated will be charged a pro-rated fee based on the amount of time remaining in the billing period. An account may be terminated with written notice at least 15 calendar days in advance. Since fees are paid in arrears, no rebate will be needed upon termination of the account.

In addition to its annual fee, Invst can charge a fixed monthly fee of \$99 for access to its Client Portal, as described in Item 4. This fee is charged in advance beginning on the date the client enrolls in this service.

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**Retirement Plan Consulting Fees**

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Invst charges as fixed project-based fee to provide clients with retirement plan consulting services. Each engagement is individually negotiated and tailored to accommodate the needs of the individual plan sponsor, as memorialized in the Agreement. These fees vary, based on the scope of the services to be rendered. In those situations where Invst has agreed to manage a plan's assets, the Firm also charges an annual asset-based fee between 10 and 100 basis points (0.10% – 1.0%), depending upon the amount of assets to be managed.

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**Fee Discretion**

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Invst may, in its sole discretion, negotiate to charge a lesser fee based upon certain criteria, such as anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, pre-existing/legacy client relationship, account retention and pro bono activities.

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**Additional Fees and Expenses**

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In addition to the advisory fees paid to Invst, 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, reporting charges, fees charged by the Independent Managers, 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. The Firm's brokerage practices are described at length in Item 12, below.

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**KennMar INVST Diversified Income Fund, LLC Fees and Expenses**

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The fund's organizational and offering document include details regarding the fees, costs, and expenses associated with the fund, and the provisions of the fund's organization and offering documents govern an investment in the private fund, including with respect to fees, operating expenses, and other costs of the fund. Any investor in the private fund must read and understand the fund's organization and offering documents. The Managing Member is entitled to (i) an Asset Management Fee equal to 1.00% of assets under management, payable quarterly in advance, (ii) an acquisition fee equal to 1.00%, (iii) a disposition fee equal to 1.00%, and (iv) a refinancing fee equal to 0.5% of the amount of the refinancing. In addition, the Managing Member may be reimbursed for formation and offering expenses incurred on the fund's behalf. Scott Jarred, the owner of Invst, stands to receive a portion of all fees and expense reimbursements

generated by the fund through his ownership of the Managing Member of the fund. This creates a conflict of interest. Invst seeks to mitigate this conflict of interest by (1) disclosing it to clients, and (2) only recommending this investment to clients that it believes the investment will be suitable. Notwithstanding, there could be other investments that are equally appropriate for clients.

### **Direct Fee Debit**

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Clients provide Invst and/or certain Independent Managers with the authority to directly debit their accounts for payment of the investment advisory fees. The Financial Institutions that act as the qualified custodian for client accounts, from which the Firm retains the authority to directly deduct fees, have agreed to send statements to clients not less than quarterly detailing all account transactions, including any amounts paid to Invst. Alternatively, clients may elect to have Invst send a separate invoice for direct payment.

### **Account Additions and Withdrawals**

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Clients can make additions to and withdrawals from their account at any time, subject to Invst's right to terminate an account. Additions can be in cash or securities provided that the Firm reserves the right to liquidate any transferred securities or declines to accept securities into a client's account. Clients can withdraw account assets on notice to Invst, subject to the usual and customary securities settlement procedures. However, the Firm designs its portfolios as long-term investments, and the withdrawal of assets may impair the achievement of a client's investment objectives. Invst may consult with its clients about the options and implications of transferring securities. Clients are advised that when transferred securities are liquidated, they may be subject to transaction fees, short-term redemption fees, fees assessed at the mutual fund level (e.g., contingent deferred sales charges) and/or tax ramifications.

### **Commissions and Sales Charges for Recommendations of Securities**

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Clients can engage certain persons associated with Invst (but not the Firm directly) to render securities brokerage services under a separate commission-based arrangement. Clients are under no obligation to engage such persons and may choose brokers or agents not affiliated with Invst.

Under this arrangement, the Firm's Supervised Persons, in their individual capacities as registered representatives of Purshe Kaplan Sterling Investments, Inc. ("PKS") may provide securities brokerage services and implement securities transactions under a separate commission-based arrangement. Supervised Persons are entitled to a portion of the brokerage commissions paid to PKS, as well as a share of any ongoing distribution or service (trail) fees from the sale of mutual funds. Invst may also recommend no-load or load-waived funds, where no sales charges are assessed. Prior to effecting any transactions, clients are required to enter into a separate account agreement with PKS.

A conflict of interest exists to the extent that a Supervised Person of Invst recommends the purchase or sale of securities through a brokerage relationship where that Supervised Person receives commissions or other additional compensation because of that recommendation (the "Brokerage Relationship"). Because the

Supervised Persons receive compensation in connection with the sale of securities in the Brokerage Relationship, a conflict of interest exists as such Supervised Persons, have an incentive to recommend more expensive securities or services to clients where such Supervised Persons earn more compensation with respect to the sale of such securities through the Brokerage Relationship rather than through an advisory relationship with the Firm. The Firm has procedures in place to ensure that any recommendations made by such Supervised Persons to engage in the Brokerage Relationship are in the best interest of that client. Clients should understand that the investments made in the Brokerage Relationship are not receiving advisory services from the Firm. Therefore, the Firm does not have a fiduciary duty over the Brokerage Relationship recommendations.

## **Item 6. Performance-Based Fees and Side-by-Side Management**

Neither Invst nor its affiliates provide services for a performance-based fee (i.e., a fee based on a share of capital gains or capital appreciation of a client's assets).

## **Item 7. Types of Clients**

Invst offers services to individuals, businesses, business owners, high-net worth individuals, pension and profit-sharing plans, and charitable organizations.

### **Minimum Account Requirements**

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Invst does not impose a stated minimum fee or minimum portfolio value for starting and maintaining an investment management relationship. Certain Independent Managers may, however, impose more restrictive account requirements and billing practices from the Firm. In these instances, Invst may alter its corresponding account requirements and/or billing practices to accommodate those of the Independent Managers.

Certain of Invest's owner and employees may serve on the investment committee to KennMar INVST Diversified Income Fund, LLC. Any minimum investment amount or other qualification requirements related to an investment in the private fund is set forth in the fund's offering documents.

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

### **Methods of Analysis**

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Invst utilizes a combination of fundamental, technical (including charting), and cyclical methods of

analysis.

Fundamental analysis involves an evaluation of the fundamental financial condition and competitive position of a particular fund or issuer. For Invst, this process typically involves an analysis of an issuer's management team, investment strategies, style drift, past performance, reputation, and financial strength in relation to the asset class concentrations and risk exposures of the Firm's model asset allocations. A substantial risk in relying upon fundamental analysis is that while the overall health and position of a company may be good, evolving market conditions may negatively impact the security.

Technical analysis (including charting analysis) involves the examination of past market data rather than specific issuer information in determining the recommendations made to clients. Technical analysis may involve the use of mathematical based indicators and charts, such as moving averages and price correlations, to identify market patterns and trends which may be based on investor sentiment rather than the fundamentals of the company. A substantial risk in relying upon technical analysis is that spotting historical trends may not help to predict such trends in the future. Even if the trend will eventually reoccur, there is no guarantee that Invst will be able to accurately predict such a reoccurrence.

Cyclical analysis is similar to technical analysis in that it involves the assessment of market conditions at a macro (entire market or economy) or micro (company specific) level, rather than focusing on the overall fundamental analysis of the health of the company that Invst is recommending. The risks with cyclical analysis are similar to those of technical analysis.

Invst may utilize the following investment strategies when implementing investment advice given to clients:

- Long Term Purchases (securities held at least a year);
- Short Term Purchases (securities sold within a year); and
- Trading (securities sold within thirty (30) days).

### **Investment Strategies**

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Invst recommends asset allocations based on a particular client's economic situation, liquidity needs, risk tolerance, proposed investment period, need for diversification, reliance upon current income, and present and anticipated tax situation. Invst also considers historical yields, potential appreciation, and marketability before making investment recommendations. Invst recommends and manages many types of asset allocations, including exchange-listed securities, mutual fund shares, corporate debt, ETFs, US government securities, REITs, Independent Managers and certificates of deposit on a discretionary basis in accordance with the client's designated investment objectives.

Invst may allocate investment advisory assets of its client accounts, on a discretionary basis, among one or more asset allocation programs. The asset allocation programs comply with the requirements of Rule 3a-4 of the Investment Company Act of 1940. Rule 3a-4 provides similarly managed investment programs, with

a non-exclusive safe harbor from the definition of an investment company.

Invst's generally manages client assets in accordance with the following:

1. *Initial Interview* – at the opening of the account, Invst, through its designated representatives, shall obtain from the client information sufficient to determine the client's financial situation and investment objectives.
2. *Individual Treatment* – the client's account is managed on the basis of the client's financial situation and investment objectives.
3. *Quarterly Notice* – at least quarterly Invst shall notify the client to advise Invst whether the client's financial situation or investment objectives have changed, or if the client wants to impose and/or modify any reasonable restrictions on the management of their account;
4. *Annual Contact* – at least annually, Invst shall contact the client to determine whether the client's financial situation or investment objectives have changed, or if the client wants to impose and/or modify any reasonable restrictions on the management of their account.
5. *Consultation Available* – Invst shall be reasonably available to consult with the client relative to the status of the client's account.
6. *Quarterly Statement* – the client shall be provided with a quarterly report for the account for the preceding period.
7. *Ability to Impose Restrictions* – the client shall have the ability to impose reasonable restrictions on the management of the account, including the ability to instruct Invst not to purchase certain mutual funds.
8. *No Pooling* – the client's beneficial interest in a security does not represent an undivided interest in all the securities held by the custodian, but rather represents a direct and beneficial interest in the securities which comprise the client's account.
9. *Separate Account* – a separate account is maintained for the client with the Custodian; and
10. *Ownership* – each client retains indicia of ownership of the account (e. g. right to withdraw securities or cash, exercise, or delegate proxy voting, and receive transaction confirmations).

### Private Funds

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Investors in private funds, including any advisory clients who elect to invest in the KennMar INVST Diversified Income Fund, LLC, are exposed to the investment strategies described in the applicable private fund's offering documents, which are materially different from the solutions described above and below.

For information regarding a private fund's strategies and the risks involved, please see the organizational and offering documents for the applicable private fund.

## **Risk of Loss**

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### *Market Risks*

Investing involves risk, including the potential loss of principal, and all investors should be guided accordingly. The profitability of a significant portion of Invst's recommendations and/or investment decisions may depend to a great extent upon correctly assessing the future course of price movements of stocks, bonds, and other asset classes. There can be no assurance that Invst will be able to predict those price movements accurately or capitalize on any such assumptions.

### *Mutual Funds and ETFs*

An investment in a mutual fund or ETF involves risk, including the loss of principal. Mutual fund and ETF shareholders are necessarily subject to the risks stemming from the individual issuers of the fund's underlying portfolio securities. Such shareholders are also liable for taxes on any fund-level capital gains, as mutual funds and ETFs are required by law to distribute capital gains in the event, they sell securities for a profit that cannot be offset by a corresponding loss.

Shares of mutual funds are generally distributed and redeemed on an ongoing basis by the fund itself or a broker acting on its behalf. The trading price at which a share is transacted is equal to a fund's stated daily per share net asset value ("NAV"), plus any shareholders fees (e.g., sales loads, purchase fees, redemption fees). The per share NAV of a mutual fund is calculated at the end of each business day, although the actual NAV fluctuates with intraday changes to the market value of the fund's holdings. The trading prices of a mutual fund's shares may differ significantly from the NAV during periods of market volatility, which may, among other factors, lead to the mutual fund's shares trading at a premium or discount to actual NAV.

Shares of ETFs are listed on securities exchanges and transacted at negotiated prices in the secondary market. Generally, ETF shares trade at or near their most recent NAV, which is generally calculated at least once daily for indexed based ETFs and potentially more frequently for actively managed ETFs. However, certain inefficiencies may cause the shares to trade at a premium or discount to their pro rata NAV. There is also no guarantee that an active secondary market for such shares will develop or continue to exist. Generally, an ETF only redeems shares when aggregated as creation units (usually 20,000 shares or more). Therefore, if a liquid secondary market ceases to exist for shares of a particular ETF, a shareholder may have no way to dispose of such shares.

### *Use of Independent Managers*

As stated above, Invst selects certain Independent Managers to manage a portion of its clients' assets. In these situations, Invst continues to conduct ongoing due diligence of such managers, but such recommendations rely to a great extent on the Independent Managers' ability to successfully implement

their investment strategies. In addition, Invst does not have the ability to supervise the Independent Managers on a day-to-day basis.

### *Options*

Options allow investors to buy or sell a security at a contracted “strike” price at or within a specific period of time. Clients may pay or collect a premium for buying or selling an option. Investors transact in options to either hedge (i.e., limit) losses in an attempt to reduce risk or to speculate on the performance of the underlying securities. Options transactions contain a number of inherent risks, including the partial or total loss of principal in the event that the value of the underlying security or index does not increase/decrease to the level of the respective strike price. Holders of options contracts are also subject to default by the option writer which may be unwilling or unable to perform its contractual obligations.

### *Real Estate Investment Trusts (REITs)*

Invst recommends an investment in, or allocate assets among, various real estate investment trusts (“REITs”), the shares of which exist in the form of either publicly traded or privately placed securities. REITs are collective investment vehicles with portfolios comprised primarily of real estate and mortgage related holdings. Many REITs hold heavy concentrations of investments tied to commercial and/or residential developments, which inherently subject REIT investors to the risks associated with a downturn in the real estate market. Investments linked to certain regions that experience greater volatility in the local real estate market may give rise to large fluctuations in the value of the vehicle’s shares. Mortgage related holdings may give rise to additional concerns pertaining to interest rates, inflation, liquidity and counterparty risk.

### *Management through Similarly Managed “Model” Accounts*

Invst manages certain accounts through the use of similarly managed “model” portfolios, whereby the Firm allocates all or a portion of its clients’ assets among various mutual funds and/or securities on a discretionary basis using one or more of its proprietary investment strategies. In managing assets through the use of models, the Firm remains in compliance with the safe harbor provisions of Rule 3a-4 of the Investment Company Act of 1940.

The strategy used to manage a model portfolio may involve an above average portfolio turnover that could negatively impact clients’ net after tax gains. While the Firm seeks to ensure that clients’ assets are managed in a manner consistent with their individual financial situations and investment objectives, securities transactions effected pursuant to a model investment strategy are usually done without regard to a client’s individual tax ramifications. Clients should contact the Firm if they experience a change in their financial situation or if they want to impose reasonable restrictions on the management of their accounts.

## **Item 9. Disciplinary Information**

Invst has not been involved in any legal or disciplinary events that are material to a client’s evaluation of its advisory business or the integrity of its management.



## Item 10. Other Financial Industry Activities and Affiliations

This item requires investment advisers to disclose certain financial industry activities and affiliations.

### **Registered Representatives of a Broker-Dealer**

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Certain of the Firm's Supervised Persons are registered representatives of PKS and provide clients with securities brokerage services under separate commission-based arrangements. These arrangements are described at length in Item 5.

### **Insurance Services**

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A number of the Firm's Supervised Persons are licensed insurance agents and offer certain insurance products on a fully disclosed commissionable basis. A conflict of interest exists to the extent that Invst recommends the purchase of insurance products where its Supervised Persons are entitled to insurance commissions or other additional compensation. The Firm has procedures in place whereby it seeks to ensure that all recommendations are made in its clients' best interest regardless of any such affiliations.

The Firm has entered into an agreement with a third-party provider—Pendella Technologies Inc. ("Pendella")—to implement, deliver and maintain a platform that facilitates marketing and sales functions and enables existing and prospective customers and clients to purchase individual insurance products. Pendella's agents and staff will represent Invst in the sale of insurance products. In exchange, Pendella provide the Firm with a portion of the revenue generated by Pendella's activities.

The Firm has entered into an agreement with a third-party provider—GJ Insurance Group. ("GJ")—independent auto, home, life, commercial and benefits insurance agency and enables existing and prospective customers and clients to purchase individual insurance products by comparing multiple providers for best price. GJ's agents and staff will represent Invst in the sale of insurance products. In exchange, GJ provide the Firm with a portion of the revenue generated by GJ's activities.

### **General Partner/ Managing Member of Investment Funds**

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The Firm's principal serves as the managing member of several limited liability companies that seek investments in direct real estate and other businesses ("Real Estate & Business LLCs"). The Firm's principal also maintains an ownership interest in the Managing Member of KennMar INVST Diversified Income Fund, LLC—a private investment fund formed to invest in and manage real estate. From time to time the Firm may recommend to certain of its client's investments in these Real Estate & Business LLCs and/or the KennMar INVST Diversified Income Fund, LLC. Investment in the Real Estate LLCs and private fund involves a significant degree of risk. All relevant information, terms and conditions relative to the Real Estate & Business LLCs and private fund, including the compensation received by its Principal as

managing member, suitability, risk factors, and potential conflicts of interest, are set forth in a Confidential Private Offering Memorandum (the “Memorandum”), Limited Partnership Agreement (the “Agreement”), and/or Subscription Agreement (together, the “Offering Documents”), which each investor is required to receive and/or execute prior to being accepted as an investor in the Real Estate & Business LLCs or KennMar INVST Diversified Income Fund, LLC.

The Firm has a conflict of interest where it acts as investment adviser to a client and recommends an investment in the Real Estate & Business LLCs or the KennMar INVST Diversified Income Fund, LLC. The conflict exists because the Firm is recommending an investment that could be invested elsewhere which would potentially remove assets from the Firm’s (or it’s affiliate’s) management. The Firm has procedures in place whereby it will ensure that all recommendations are suitable and provides clients additional disclosures related to alternative investments.

## Item 11. Code of Ethics

Invst has adopted a code of ethics in compliance with applicable securities laws (“Code of Ethics”) that sets forth the standards of conduct expected of its Supervised Persons. Invst’s Code of Ethics contains written policies reasonably designed to prevent certain unlawful practices such as the use of material non-public information by the Firm or any of its Supervised Persons and the trading by the same of securities ahead of clients in order to take advantage of pending orders.

The Code of Ethics also requires certain of Invst’s personnel to report their personal securities holdings and transactions and obtain pre-approval of certain investments (*e.g.*, initial public offerings, limited offerings). However, the Firm’s Supervised Persons are permitted to buy or sell securities that it also recommends to clients if done in a fair and equitable manner that is consistent with the Firm’s policies and procedures. This Code of Ethics has been established recognizing that some securities trade in sufficiently broad markets to permit transactions by certain personnel to be completed without any appreciable impact on the markets of such securities. Therefore, under limited circumstances, exceptions may be made to the policies stated below.

When the Firm is engaging in or considering a transaction in any security on behalf of a client, no Supervised Person with access to this information may knowingly effect for themselves or for their immediate family (*i.e.*, spouse, minor children and adults living in the same household) a transaction in that security unless:

- the transaction has been completed;
- the transaction for the Supervised Person is completed as part of a batch trade with clients; or
- a decision has been made not to engage in the transaction for the client

These requirements are not applicable to: (i) direct obligations of the Government of the United States; (ii) money market instruments, bankers’ acceptances, bank certificates of deposit, commercial paper, repurchase agreements and other high quality short-term debt instruments, including repurchase

agreements; (iii) shares issued by mutual funds or money market funds; and (iv) shares issued by unit investment trusts that are invested exclusively in one or more mutual funds.

Invst may recommend that clients invest in the KennMar INVST Diversified Income Fund, LLC. See Items 4, 5, 7, 8 and 10 for more information about that arrangement and the conflicts of interest it creates.

Clients and prospective clients may contact Invst to request a copy of its Code of Ethics.

## Item 12. Brokerage Practices

### Recommendation of Broker-Dealers for Client Transactions

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Invst recommends that clients utilize the custody, brokerage and clearing services of Charles Schwab & Co, Inc. through its Schwab Advisor Services division (“Schwab”), TD AMERITRADE Institutional, a division of TD AMERITRADE, Inc. (“TD Ameritrade”), Interactive Brokers LLC (“IB”), and SEI Investments Distribution Co. (“SEI”) (collectively, “the Financial Institutions”) for investment management accounts. The final decision to custody assets with the Financial Institutions is at the discretion of the client, including those accounts under ERISA or IRA rules and regulations, in which case the client is acting as either the plan sponsor or IRA accountholder. Invst is independently owned and operated and not affiliated with the Financial Institutions. The Financial Institutions provide Invst with access to its institutional trading and custody services, which are typically not available to retail investors.

Factors which Invst considers in recommending the Financial Institutions or any other broker-dealer to clients include their respective financial strength, reputation, execution, pricing, research and service. The Financial Institutions enable the Firm to obtain many mutual funds without transaction charges and other securities at nominal transaction charges. The commissions and/or transaction fees charged by Financial Institutions may be higher or lower than those charged by other providers.

The commissions paid by Invst’s clients to the Financial Institutions comply with the Firm’s duty to obtain “best execution.” Clients may pay commissions that are higher than another qualified broker-dealer might charge to effect the same transaction where Invst determines that the commissions are reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer’s services, including among others, the value of research provided, execution capability, commission rates and responsiveness. Invst seeks competitive rates but may not necessarily obtain the lowest possible commission rates for client transactions.

In limited circumstances, Invst may clear transactions through other broker-dealers with whom the Firm and its custodians have entered into agreements for prime brokerage clearing services. Should an account make use of prime brokerage, the Client may be required to sign an additional agreement, and additional fees are likely to be charged.

Consistent with obtaining best execution, brokerage transactions are directed to certain broker-dealers in

return for investment research products and/or services which assist Invst in its investment decision-making process. Such research will be used to service all of the Firm's clients, but brokerage commissions paid by one client may be used to pay for research that is not used in managing that client's portfolio. The receipt of investment research products and/or services as well as the allocation of the benefit of such investment research products and/or services poses a conflict of interest because Invst does not have to produce or pay for the products or services.

Invst periodically and systematically reviews its policies and procedures regarding its recommendation of Financial Institutions in light of its duty to obtain best execution.

### **Software and Support Provided by Financial Institutions**

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Invst receives without cost from the Financial Institutions administrative support, computer software, related systems support, as well as other third party support as further described below (together "Support") which allow Invst to better monitor client accounts maintained at the Financial Institutions and otherwise conduct its business. Invst receives the Support without cost because the Firm renders investment management services to clients that maintain assets at the Financial Institutions. The Support is not provided in connection with securities transactions of clients (i.e., not "soft dollars"). The Support benefits Invst, but not its clients directly. Clients should be aware that Invst's receipt of economic benefits such as the Support from broker-dealers creates a conflict of interest since these benefits may influence the Firm's choice of broker-dealer over another that does not furnish similar software, systems support or services. In fulfilling its duties to its clients, Invst endeavors at all times to put the interests of its clients first and has determined that the recommendation of the Financial Institutions is in the best interest of clients and satisfies the Firm's duty to seek best execution.

Specifically, Invst receives the following benefits from the Financial Institutions: i) receipt of duplicate client confirmations and bundled duplicate statements; ii) access to a trading desk that exclusively services its institutional traders; iii) access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to client accounts; and iv) access to an electronic communication network for client order entry and account information.

#### *Schwab*

With respect to benefits received from Schwab, these services generally are available to independent investment advisors on an unsolicited basis, at no charge to them so long as a total of at least \$10 million of the advisor's clients' assets are maintained in accounts at Schwab Advisor Services. Schwab's services include brokerage services that are related to the execution of securities transactions, custody, research, including that in the form of advice, analyses and reports, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

For client accounts maintained in its custody, Schwab generally does not charge separately for custody services but is compensated by account holders through commissions or other transaction-related or asset-

based fees for securities trades that are executed through Schwab or that settle into Schwab accounts.

Schwab also makes available to the Firm other products and services that benefit the Firm but may not benefit its clients' accounts. These benefits may include national, regional or Firm specific educational events organized and/or sponsored by Schwab. Other potential benefits may include occasional business entertainment of personnel of Invst by Schwab personnel, including meals, invitations to sporting events, including golf tournaments, and other forms of entertainment, some of which may accompany educational opportunities. Other of these products and services assist Invst in managing and administering clients' accounts. These include software and other technology (and related technological training) that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts), provide research, pricing information and other market data, facilitate payment of the Firm's fees from its clients' accounts, and assist with back-office training and support functions, recordkeeping and client reporting. Many of these services generally may be used to service all or some substantial number of the Firm's accounts, including accounts not maintained at Schwab. Schwab also makes available to Invst other services intended to help the Firm manage and further develop its business enterprise. These services may include professional compliance, legal and business consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, employee benefits providers, human capital consultants, insurance and marketing. In addition, Schwab may make available, arrange and/or pay vendors for these types of services rendered to the Firm by independent third parties. Schwab may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to the Firm. While, as a fiduciary, Invst endeavors to act in its clients' best interests, the Firm's recommendation that clients maintain their assets in accounts at Schwab may be based in part on the benefits received and not solely on the nature, cost or quality of custody and brokerage services provided by Schwab, which creates a potential conflict of interest.

#### *TD Ameritrade*

There is no direct link between Invst's participation in TD Ameritrade's institutional customer program and the investment advice it gives to its clients, although Invst receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. Additionally, Invst may receive the following benefits from TD Ameritrade through its registered investment adviser division: receipt of duplicate client confirmations and bundled duplicate statements; access to a trading desk that exclusively services its Registered Investment Adviser participants; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to client accounts; and access to an electronic communication network for client order entry and account information. The Firm also has the ability deduct advisory fees directly from client accounts; access to an electronic communications network for client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to the Firm by third party vendors. TD Ameritrade may fund business consulting and professional services received by Invst's related persons.

Some of the products and services made available by TD Ameritrade through the program may benefit Invst but not its client. These products or services may assist Invst in managing and administering client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help Invst manage and further develop its business enterprise. The benefits received by Invst's participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade.

## **Brokerage for Client Referrals**

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Invst does not consider, in selecting or recommending broker-dealers, whether the Firm receives client referrals from the Financial Institutions or other third party.

## **Directed Brokerage**

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The client may direct Invst in writing to use a particular Financial Institution to execute some or all transactions for the client. In that case, the client will negotiate terms and arrangements for the account with that Financial Institution and the Firm will not seek better execution services or prices from other Financial Institutions or be able to "batch" client transactions for execution through other Financial Institutions with orders for other accounts managed by Invst (as described above). As a result, the client may pay higher commissions or other transaction costs, greater spreads or may receive less favorable net prices, on transactions for the account than would otherwise be the case. Subject to its duty of best execution, Invst may decline a client's request to direct brokerage if, in the Firm's sole discretion, such directed brokerage arrangements would result in additional operational difficulties.

## **Commissions or Sales Charges for Recommendations of Securities**

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As discussed above, certain Supervised Persons in their respective individual capacities are registered representatives of PKS. These Supervised Persons are subject to FINRA Rule 3040 which restricts registered representatives from conducting securities transactions away from their broker-dealer unless PKS provides written consent. Therefore, clients are advised that certain Supervised Persons are restricted to conducting securities transactions through PKS if they have not secured written consent from PKS to execute securities transactions through a different broker-dealer. Absent such written consent or separation from PKS, these Supervised Persons are prohibited from executing securities transactions through any broker-dealer other than PKS under its internal supervisory policies. The Firm is cognizant of its duty to obtain best execution and has implemented policies and procedures reasonably designed in such pursuit.

## **Trade Aggregation**

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Transactions for each client will be effected independently, unless Invst decides to purchase or sell the same securities for several clients at approximately the same time. Invst may (but is not obligated to) combine or "batch" such orders to obtain best execution, to negotiate more favorable commission rates or to allocate

equitably among the Firm's clients differences in prices and commissions or other transaction costs that might not have been obtained had such orders been placed independently. Under this procedure, transactions will be averaged as to price and allocated among Invst's clients pro rata to the purchase and sale orders placed for each client on any given day. To the extent that the Firm determines to aggregate client orders for the purchase or sale of securities, including securities in which Invst's Supervised Persons may invest, the Firm does so in accordance with applicable rules promulgated under the Advisers Act and no-action guidance provided by the staff of the U.S. Securities and Exchange Commission. Invst does not receive any additional compensation or remuneration as a result of the aggregation.

In the event that the Firm determines that a prorated allocation is not appropriate under the particular circumstances, the allocation will be made based upon other relevant factors, which include: (i) when only a small percentage of the order is executed, shares may be allocated to the account with the smallest order or the smallest position or to an account that is out of line with respect to security or sector weightings relative to other portfolios, with similar mandates; (ii) allocations may be given to one account when one account has limitations in its investment guidelines which prohibit it from purchasing other securities which are expected to produce similar investment results and can be purchased by other accounts; (iii) if an account reaches an investment guideline limit and cannot participate in an allocation, shares may be reallocated to other accounts (this may be due to unforeseen changes in an account's assets after an order is placed); (iv) with respect to sale allocations, allocations may be given to accounts low in cash; (v) in cases when a pro rata allocation of a potential execution would result in a de minimis allocation in one or more accounts, the Firm may exclude the account(s) from the allocation; the transactions may be executed on a pro rata basis among the remaining accounts; or (vi) in cases where a small proportion of an order is executed in all accounts, shares may be allocated to one or more accounts on a random basis.

## **Item 13. Review of Accounts**

### **Account Reviews**

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Invst monitors client portfolios on a continuous and ongoing basis while regular account reviews are conducted on at least a quarterly basis. A client's account is reviewed by the investment adviser representatives assigned to that client's account(s). All investment advisory clients are encouraged to discuss their needs, goals and objectives with Invst and to keep the Firm informed of any changes thereto. The Firm contacts ongoing investment advisory clients at least annually to review its previous services and/or recommendations and quarterly to discuss the impact resulting from any changes in the client's financial situation and/or investment objectives.

### **Account Statements and Reports**

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Clients are provided with transaction confirmation notices and regular summary account statements directly from the Financial Institutions where their assets are custodied. From time-to-time or as otherwise requested, clients may also receive written or electronic reports from Invst and/or an outside service



provider, which contain certain account and/or market-related information, such as an inventory of account holdings or account performance. Clients should compare the account statements they receive from their custodian with any documents or reports they receive from Invst or an outside service provider.

### **Private Fund**

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The investment committee of the KennMar INVST Diversified Income Fund, LLC is responsible for reviewing the fund's portfolio. Reviews of private funds consists of an analysis of the portfolio holdings (when available) and performance to-date in light of the fund's investment objective, as well as an evaluation of any appropriate changes to be implemented with respect to the portfolio. Investors receive the fund's annual audited financial statement.

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

### **Client Referrals**

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The Firm does not currently provide compensation to any third-party solicitors for client referrals. In the event a client is introduced to Invst by either an unaffiliated or an affiliated solicitor, the Firm may pay that solicitor a referral fee in accordance with applicable state securities laws. Unless otherwise disclosed, any such referral fee is paid solely from Invst's investment Program Fee and does not result in any additional charge to the client. If the client is introduced to the Firm by an unaffiliated solicitor, the solicitor is required to provide the client with Invst's written brochure(s) and a copy of a solicitor's disclosure statement containing the terms and conditions of the solicitation arrangement. Any affiliated solicitor of Invst is required to disclose the nature of his or her relationship to prospective clients at the time of the solicitation and will provide all prospective clients with a copy of the Firm's written brochure(s) at the time of the solicitation.

### **Other Compensation**

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The Firm receives economic benefits from the Financial Institutions. The benefits, conflicts of interest and how they are addressed are discussed above in response to Item 12.

#### *Compensation from Pendella*

The Firm also receives a portion of the revenue generated by Pendella arising from Pendella's efforts when it assists the Firm with placing insurance products with clients. The percentage of revenue sharing is not contractually agreed to and the Firm and Pendella revisit the percentage on a product-by-product basis. However, the Firm generally expects to receive up to 72.5% of commissions generated. Clients are free to request information about the revenue share on any recommended insurance product and the Firm endeavors to provide that information upon request.

This arrangement creates a conflict of interest, because the Firm is incentivized to introduce more clients



to Pendella and they are incentivized to sell clients more insurance products and those that compensate them better.

The insurance premium is ultimately dictated by the insurance carrier, although in some circumstances the brokers may have the ability to influence an insurance carrier to lower the premium of the policy. The final rate may be higher or lower than the prevailing market rate. The Firm can offer no assurances that the rates offered to clients by the insurance carrier are the lowest possible rates available in the marketplace.

The Firm mitigates this conflict by fully and fairly disclosing the material facts concerning the above arrangements to clients, including in this Brochure. Additionally, the Firm notes that clients will receive product-specific disclosure from the insurance carriers and other unaffiliated third-party intermediaries that provide them services.

#### *Compensation from GJ Insurance Group*

The Firm also receives 40% of the revenue generated by GJ Insurance Group arising from GJ Insurance Group's efforts when it assists the Firm with placing insurance products with clients. Clients are free to request information about the revenue share on any recommended insurance product and the Firm endeavors to provide that information upon request.

## **Item 15. Custody**

The Advisory Agreement and/or the separate agreement with any Financial Institution authorize Invst and/or the Independent Managers to debit client accounts for payment of the Firm's fees and to directly remit that those funds to the Firm in accordance with applicable custody rules. The Financial Institutions that act as the qualified custodian for client accounts, from which the Firm retains the authority to directly deduct fees, have agreed to send statements to clients not less than quarterly detailing all account transactions, including any amounts paid to Invst.

In addition, as discussed in Item 13, Invst will also send, or otherwise make available, periodic supplemental reports to clients. Clients should carefully review the statements sent directly by the Financial Institutions and compare them to those received from Invst.

#### **Standing Letters of Authorization**

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Invst also has custody due to clients giving the Firm limited power of attorney in a standing letter of authorization ("SLOA") to disburse funds to one or more third parties as specifically designated by the client. In such circumstances, the Firm will implement the steps in the SEC's no-action letter on February 21, 2017 which includes (in summary): i) client will provide instruction for the SLOA to the custodian; ii) client will authorize the Firm to direct transfers to the specific third party; iii) the custodian will perform appropriate verification of the instruction and provide a transfer of funds notice to the client promptly after each transfer; iv) the client will have the ability to terminate or change the instruction; v) the Firm will have no authority or ability to designate or change the identity or any information about the third party; vi) the

Firm will keep records showing that the third party is not a related party of the Firm or located at the same address as the Firm; and vii) the custodian will send the client an initial and annual notice confirming the SLOA instructions.

### **Managing Member of Investment Funds**

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The Firm's principal serves as the managing member of several Real Estate & Business LLCs and the KennMar INVST Diversified Income Fund, LLC as described in Item 10 and so the Firm is deemed to have custody of client assets. As such Invst or the fund will engage an independent public accountant registered with, and subject to regulatory inspection by, the Public Accounting Oversight Board (PCAOB) to conduct an annual audit of the Real Estate & Business LLCs. The Real Estate & Business LLCs will distribute the audited financials to each investor within 180 days of the fund's fiscal year-end. Real Estate & Business LLCs are not administered by a third-party administrator and are not maintained with an independent qualified custodian. Invst through its principal has direct access to those client funds invested in the Real Estate & Business LLCs and the KennMar INVST Diversified Income Fund, LLC.

### **Item 16. Investment Discretion**

Invst is given the authority to exercise discretion on behalf of clients. Invst is considered to exercise investment discretion over a client's account if it can effect and/or direct transactions in client accounts without first seeking their consent. Invst is given this authority through a power-of-attorney included in the agreement between Invst and the client. Clients may request a limitation on this authority (such as certain securities not to be bought or sold). Invst takes discretion over the following activities:

- The securities to be purchased or sold;
- The amount of securities to be purchased or sold;
- When transactions are made; and
- The Independent Managers to be hired or fired.

We only make recommendations to advisory clients regarding investing in the KennMar INVST Diversified Income Fund, LLC on a non-discretionary basis, meaning that an advisory client must decide on a case-by-case basis whether to accept or reject Invst's recommendations regarding making an investment in the KennMar INVST Diversified Income Fund, LLC.

### **Item 17. Voting Client Securities**

Invst does not accept the authority to vote a client's securities (i.e., proxies) on their behalf. Clients receive proxies directly from the Financial Institutions where their assets are custodied and may contact the Firm at the contact information on the cover of this brochure with questions about any such issuer solicitations.

## **Item 18. Financial Information**

Invst is not required to disclose any financial information due to the following:

- The Firm does not require or solicit the prepayment of more than \$1,200 in fees six months or more in advance of services rendered;
- The Firm does not have a financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients; and
- The Firm has not been the subject of a bankruptcy petition at any time during the past ten years.

Invst, LLC (also doing business as “Kilter Group” & “Levine Financial Group”) is registered with the U.S. Securities and Exchange Commission as an investment adviser. Brokerage and investment advisory services fees differ and it is important for you to understand the differences. Free and simple tools are available to research firms and financial professionals at <http://investor.gov/crs>, which also provides educational materials about broker-dealers, investment advisers and investing.

## What investment services and advice can you provide me?

Our firm offers investment advisory services, which are fully described in our Form ADV Part 2A (“Disclosure Brochure”). Our services include financial planning, consulting, and investment management services. As part of our standard services, we monitor investments that we manage on a continuous and ongoing basis. Financial planning and investment consulting recommendations are not actively monitored. There are no material limitations to our monitoring. We accept discretionary and/or non-discretionary authority to implement the recommended transactions in client accounts. The level of discretion is determined in our agreement and there are no material limitations on the authority. For non-discretionary services, you make the ultimate decision regarding the purchase or sale of investments. We do not offer advice only with respect to proprietary products. We offer advice on exchange-listed securities, mutual fund shares, corporate debt, exchange-traded funds (“ETFs”), US government securities, real estate investment trusts (“REITs”), independent investment managers (“Independent Managers”) and certificates of deposit. Our services are not subject to a minimum fee or account size.

**Additional information about our services can be found in Items 4, 5 and 7 of our Disclosure Brochure and available to all clients or by going here:** <https://adviserinfo.sec.gov/firm/summary/282863>.

### *Let’s discuss...*

- *Given my financial situation, should I choose an investment advisory service? Why or why not?*
- *How will you choose investments to recommend to me?*
- *What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?*

## What fees will I pay?

We offer our services on a fee basis. We charge a fixed fee for financial planning and investment consulting and a fee based upon assets under management for investment management and wealth management services. For ongoing services, the annual fee is prorated and charged monthly. For assets managed through our wrap program, the asset-based fees will include most transaction costs and fees paid.

In addition to the advisory fees paid to us, you also incur certain charges imposed by other third parties, such as broker-dealers, custodians, etc. These additional charges include securities brokerage commissions, transaction fees, custodial fees, fees attributable to alternative assets, reporting charges, fees charged by the Independent Managers, 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..

The more assets there are in your advisory accounts, the more you will pay in fees, so the firm may therefore have an incentive to encourage you to increase the assets in your account or manage them in a way where we charge higher fees. You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

**Additional information about our fees can be found in Item 5 of our Disclosure Brochure and available to all clients or by going here:** <https://adviserinfo.sec.gov/firm/summary/282863>.

*Let’s discuss... Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?*

## **What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?**

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**When we act as your investment adviser**, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means.

- **Third-Party Payments:** While we do not receive compensation from third parties when we recommend investments, our supervised persons or affiliates can do this in their individual capacities. This results in an incentive for our supervised persons or affiliates to recommend those investments and potentially more frequent purchases.

*Let's discuss... How might your conflicts of interest affect me, and how will you address them?*

**Additional information about our conflicts of interest can be found throughout our Disclosure Brochure and available to all clients or by going here:** <https://adviserinfo.sec.gov/firm/summary/282863>.

## **How do your financial professionals make money?**

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Our financial professionals are compensated based on the following factors and conflicts of interest:

- The amount of client assets they service. This results in an incentive to favor clients with more assets being serviced.
- The time and complexity required to meet the client's needs. This results in an incentive to spend more time on issues than are required.
- The product sold. This results in an incentive to sell certain investments and more frequently.
- Sales commissions, while not earned as financial professionals of our firm, result in an incentive to sell certain investments and more frequently.

**Additional information about our financial professionals can be found on their respective Form ADV Part 2 Brochure Supplements that you will be provided.**

## **Do you or your financial professionals have legal or disciplinary history?**

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Yes, we or our financial professionals have a legal or disciplinary history. You can visit <http://investor.gov/crs> for a free and simple search tool to research us and our financial professionals.

*Let's discuss... As a financial professional, do you have any disciplinary history? For what type of conduct?*

You can find additional information about our services on our website at <http://www.invst.com> and in our Disclosure Brochure. To request a copy of this Relationship Summary and any of our other disclosure documents referred to in this document, please call us at (317) 202-1891.

*Let's discuss... Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?*

# Brochure Supplement



MAKING MONEY WORK FOR PEOPLE

06.09.2022

## Scott A. Jarred

3625 E. 96th Street  
Indianapolis, Indiana 46240

(317) 202-1891

This Brochure Supplement provides information about Scott A. Jarred that supplements the Disclosure Brochure of Invst, LLC (hereinafter "Invst"), a copy of which you should have received. Please contact Invst's Chief Compliance Officer if you did not receive the Disclosure Brochure or if you have any questions about the contents of this Brochure Supplement. Additional information about Joshua Peters is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Invst, LLC, a Registered Investment Adviser**

3625 E. 96th Street, Indianapolis, Indiana 46240 | (317) 202-1891  
[www.invst.com](http://www.invst.com)

## Item 2. Educational Background and Business Experience

Born 1976

### Post-Secondary Education

Ball State University | MS, Information and Communication

Technology | 2001

Ball State University | BS, Urban Development and Finance | 2000

### Recent Business Background

Invst, LLC | Chief Executive Officer and Investment Adviser Representative | May 2016 – Present

Park Avenue Securities LLC | Registered Representative and Investment Adviser Representative |

September 2007 – May 2016

### Professional Designation

Supervised Person holds the professional designation CERTIFIED FINANCIAL PLANNER™ (“CFP®”).

The CFP® certification is a financial planning credential awarded by the Certified Financial Planner Board of Standards Inc. (the “CFP Board”) to individuals who meet its education, examination, experience and ethics requirements. Eligible candidates are generally required to have three years of financial planning related experience and possess a bachelor’s degree from an accredited U.S. college or university. Certificants are further required to complete a CFP Board-Registered Education Program (or possess a qualifying professional credential), clear a personal and professional background check, and pass the CFP® Certification Examination, a ten-hour multiple-choice exam divided into three separate sessions. In order to maintain the certification, CFP® designees must also complete at least 30 hours of continuing education every two years on an ongoing basis.

## Item 3. Disciplinary Information

Invst is required to disclose information regarding any legal or disciplinary events material to a client’s evaluation of Scott A. Jarred. Invst has no information to disclose in relation to this Item.

## Item 4. Other Business Activities

Invst is required to disclose information regarding any investment-related business or occupation in which Scott A. Jarred is actively engaged. Scott A. Jarred owns Jarred Ventures LLC and Jarred Holdings LLC, which own property entities, that own, develop and operate property projects.

### **Item 5. Additional Compensation**

Invst is required to disclose information regarding any arrangement under which Scott A. Jarred receives an economic benefit from someone other than a client for providing investment advisory services. Invst has no information to disclose in relation to this Item.

### **Item 6. Supervision**

Dipen Mehta, Chief Compliance Officer, is generally responsible for supervising Scott A. Jarred's advisory activities on behalf of Invst. Mr. Mehta can be reached at the firm's main telephone number listed on the cover page of this Brochure Supplement.

Invst supervises its personnel and the investments made in client accounts. Invst monitors the investments recommended by Scott A. Jarred to ensure they are suitable for the particular client and consistent with their investment needs, goals, objectives and risk tolerance, as well as any restrictions previously requested by the client. Invst periodically reviews the advisory activities of Scott A. Jarred, which may include reviewing individual client accounts and correspondence (including e-mails) sent and received by Scott A. Jarred.



# Brochure Supplement



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06.09.2022

## Amanda Oakley

3625 E. 96th Street  
Indianapolis, Indiana 46240

(317) 202-1891

This Brochure Supplement provides information about Amanda Oakley that supplements the Disclosure Brochure of Invst, LLC (hereinafter "Invst"), a copy of which you should have received. Please contact Invst's Chief Compliance Officer if you did not receive the Disclosure Brochure or if you have any questions about the contents of this Brochure Supplement. Additional information about Amanda Oakley is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Invst, LLC, a Registered Investment Adviser**

3625 E. 96th Street, Indianapolis, Indiana 46240 | (317) 202-1891  
[www.invst.com](http://www.invst.com)

## Item 2. Educational Background and Business Experience

### Post-Secondary Education

Purdue University | B.S. Business Administration and Management | 2005

### Recent Business Background

Invst, LLC | Advisor | March 2019 – Present

Goldstein Group Financial Advisors | Financial Advisor | September 2015 – March 2019

Ameriprise Financial Services, Inc. | Financial Advisor | September 2005 – September 2015

### Professional Designation

Supervised Person holds the professional designation CERTIFIED FINANCIAL PLANNER™ (“CFP®”).

The CFP® certification is a financial planning credential awarded by the Certified Financial Planner Board of Standards Inc. (the “CFP Board”) to individuals who meet its education, examination, experience and ethics requirements. Eligible candidates are generally required to have three years of financial planning related experience and possess a bachelor’s degree from an accredited U.S. college or university. Certificants are further required to complete a CFP Board-Registered Education Program (or possess a qualifying professional credential), clear a personal and professional background check, and pass the CFP® Certification Examination, a ten-hour multiple choice exam divided into three separate sessions. In order to maintain the certification, CFP® designees must also complete at least 30 hours of continuing education every two years on an ongoing basis.

## Item 3. Disciplinary Information

Invst is required to disclose information regarding any legal or disciplinary events material to a client’s evaluation of Amanda Oakley. Invst has no information to disclose in relation to this Item.

## Item 4. Other Business Activities

Invst is required to disclose information regarding any investment-related business or occupation in which Amanda Oakley is actively engaged. Invst has no information to disclose in relation to this Item.

### **Item 5. Additional Compensation**

Invst is required to disclose information regarding any arrangement under which Amanda Oakley receives an economic benefit from someone other than a client for providing investment advisory services. Invst has no information to disclose in relation to this Item.

### **Item 6. Supervision**

Dipen Mehta, Chief Compliance Officer, is generally responsible for supervising Amanda Oakley's advisory activities on behalf of Invst. Mr. Mehta can be reached at the firm's main telephone number listed on the cover page of this Brochure Supplement.

Invst supervises its personnel and the investments made in client accounts. Invst monitors the investments recommended by Amanda Oakley to ensure they are suitable for the particular client and consistent with their investment needs, goals, objectives, and risk tolerance, as well as any restrictions previously requested by the client. Invst periodically reviews the advisory activities of Amanda Oakley, which may include reviewing individual client accounts and correspondence (including e-mails) sent and received by Amanda Oakley.

# Brochure Supplement



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06.09.2022

## Joshua Peters

3625 E. 96th Street  
Indianapolis, Indiana 46240

(317) 202-1891

This Brochure Supplement provides information about Joshua Peters that supplements the Disclosure Brochure of Invst, LLC (hereinafter "Invst"), a copy of which you should have received. Please contact Invst's Chief Compliance Officer if you did not receive the Disclosure Brochure or if you have any questions about the contents of this Brochure Supplement. Additional information about Joshua Peters is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Invst, LLC, a Registered Investment Adviser**

3625 E. 96th Street, Indianapolis, Indiana 46240 | (317) 202-1891  
[www.invst.com](http://www.invst.com)

### Item 2. Educational Background and Business Experience

Born 1978

#### Post-Secondary Education

Brigham Young University | Bachelors, American Studies | 2003

Oklahoma State University | Masters, Business Administration | 2017

Boston University | Certificate, Financial Planning | 2021

#### Recent Business Background

Invst, LLC | Advisor | July 2021 – Present

Boston Mountain Money Management | Sr. Portfolio Manager | March 2019 – November 2020

Cephas Fiduciary Investments | Sr. Advisor | August 2017 – March 2019

Cloud Capital, LLC | Portfolio Manager | November 2010 – December 2018

#### Professional Designation

Supervised Person holds the professional designation CERTIFIED FINANCIAL PLANNER™ (“CFP®”).

The CFP® certification is a financial planning credential awarded by the Certified Financial Planner Board of Standards Inc. (the “CFP Board”) to individuals who meet its education, examination, experience and ethics requirements. Eligible candidates are generally required to have three years of financial planning related experience and possess a bachelor’s degree from an accredited U.S. college or university. Certificants are further required to complete a CFP Board-Registered Education Program (or possess a qualifying professional credential), clear a personal and professional background check, and pass the CFP® Certification Examination, a ten-hour multiple choice exam divided into three separate sessions. In order to maintain the certification, CFP® designees must also complete at least 30 hours of continuing education every two years on an ongoing basis.

### Item 3. Disciplinary Information

Invst is required to disclose information regarding any legal or disciplinary events material to a client’s evaluation of Joshua Peters. Invst has no information to disclose in relation to this Item.

### Item 4. Other Business Activities

Invst is required to disclose information regarding any investment-related business or occupation in which Joshua Peters is actively engaged. Invst has no information to disclose in relation to this Item.

### **Item 5. Additional Compensation**

Invst is required to disclose information regarding any arrangement under which Joshua Peters receives an economic benefit from someone other than a client for providing investment advisory services. Invst has no information to disclose in relation to this Item.

### **Item 6. Supervision**

Dipen Mehta, Chief Compliance Officer, is generally responsible for supervising Joshua Peters's advisory activities on behalf of Invst. Mr. Mehta can be reached at the firm's main telephone number listed on the cover page of this Brochure Supplement.

Invst supervises its personnel and the investments made in client accounts. Invst monitors the investments recommended by Joshua Peters to ensure they are suitable for the particular client and consistent with their investment needs, goals, objectives and risk tolerance, as well as any restrictions previously requested by the client. Invst periodically reviews the advisory activities of Joshua Peters, which may include reviewing individual client accounts and correspondence (including e-mails) sent and received by Joshua Peters.

# Brochure Supplement



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06.09.2022

## Matt Hasbrook

3625 E. 96th Street  
Indianapolis, Indiana 46240

(317) 202-1891

This Brochure Supplement provides information about Matt Hasbrook that supplements the Disclosure Brochure of Invst, LLC (hereinafter "Invst"), a copy of which you should have received. Please contact Invst's Chief Compliance Officer if you did not receive the Disclosure Brochure or if you have any questions about the contents of this Brochure Supplement. Additional information about Matt Hasbrook is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Invst, LLC, a Registered Investment Adviser**

3625 E. 96th Street, Indianapolis, Indiana 46240 | (317) 202-1891  
[www.invst.com](http://www.invst.com)

### Item 2. Educational Background and Business Experience

#### Post-Secondary Education

Michigan State University | B.S. Computer Science & Telecom | 2002

University of Notre Dame | BBA Finance | 2005

#### Recent Business Background

Invst, LLC | Business Development Executive | September 2021 – Present

Better Family, LLC | Co-Founder | January 2021 - Present

MassMutual | Managing Director | August 2016 – December 2020

Merrill Lynch | Private Wealth Advisor | February 2012 – August 2016

### Item 3. Disciplinary Information

Invst is required to disclose information regarding any legal or disciplinary events material to a client's evaluation of Matt Hasbrook. Invst has no information to disclose in relation to this Item.

### Item 4. Other Business Activities

Invst is required to disclose information regarding any investment-related business or occupation in which Matt Hasbrook is actively engaged. Matt is an owner of Health to You Now, LLC (DBA Feel Good Now) Co-Founder, Better Family, LLC Investor, FullStack PEO, SpotFund.

### Item 5. Additional Compensation

Invst is required to disclose information regarding any arrangement under which Matt Hasbrook receives an economic benefit from someone other than a client for providing investment advisory services. Invst has no information to disclose in relation to this Item.

### Item 6. Supervision

Dipen Mehta, Chief Compliance Officer, is generally responsible for supervising Matt Hasbrook's advisory activities on behalf of Invst. Mr. Mehta can be reached at the firm's main telephone number listed on the cover page of this Brochure Supplement.

Invst supervises its personnel and the investments made in client accounts. Invst monitors the investments recommended by Matt Hasbrook to ensure they are suitable for the particular client and consistent with their investment needs, goals, objectives, and risk tolerance, as well as any restrictions previously requested by the client. Invst periodically reviews the advisory activities of Matt Hasbrook, which may include reviewing individual client accounts and correspondence (including e-mails) sent and received by Matt Hasbrook.



# Brochure Supplement



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06.09.2022

## Christopher P. Condle

3625 E. 96th Street  
Indianapolis, Indiana 46240

(317) 202-1891

This Brochure Supplement provides information about Christopher P. Condle that supplements the Disclosure Brochure of Invst, LLC (hereinafter "Invst"), a copy of which you should have received. Please contact Invst's Chief Compliance Officer if you did not receive the Disclosure Brochure or if you have any questions about the contents of this Brochure Supplement. Additional information about Christopher P. Condle is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Invst, LLC, a Registered Investment Adviser**

3625 E. 96th Street, Indianapolis, Indiana 46240 | (317) 202-1891  
[www.invst.com](http://www.invst.com)

### Item 2. Educational Background and Business Experience

Born 1980

#### Post-Secondary Education

Butler University | BS, Finance | 2001

#### Recent Business Background

Invst, LLC | Investment Advisor Representative | August 2016 – Present

Purshe Kaplan Sterling Investments, Inc. | Registered Representative | August 2016 – Present

Park Avenue Securities LLC | Investment Adviser Representative | February 2003 – August 2016

Park Avenue Securities LLC | Registered Representative | February 2003 – August 2016

#### Professional Designation

Supervised Person holds the professional designation CERTIFIED FINANCIAL PLANNER™ (“CFP®”).

The CFP® certification is a financial planning credential awarded by the Certified Financial Planner Board of Standards Inc. (the “CFP Board”) to individuals who meet its education, examination, experience and ethics requirements. Eligible candidates are generally required to have three years of financial planning related experience and possess a bachelor’s degree from an accredited U.S. college or university. Certificants are further required to complete a CFP Board-Registered Education Program (or possess a qualifying professional credential), clear a personal and professional background check, and pass the CFP® Certification Examination, a ten-hour multiple-choice exam divided into three separate sessions. In order to maintain the certification, CFP® designees must also complete at least 30 hours of continuing education every two years on an ongoing basis.

### Item 3. Disciplinary Information

Invst is required to disclose information regarding any legal or disciplinary events material to a client’s evaluation of Christopher P. Condle. Invst has no information to disclose in relation to this Item.

### Item 4. Other Business Activities

Invst is required to disclose information regarding any investment-related business or occupation in which Christopher P. Condle is actively engaged. Christopher P. Condle is a registered representative of Purshe Kaplan Sterling Investments and manages properties under Thistle Investments.

### **Item 5. Additional Compensation**

Invst is required to disclose information regarding any arrangement under which Christopher P. Condle receives an economic benefit from someone other than a client for providing investment advisory services. Invst has no information to disclose in relation to this Item.

### **Item 6. Supervision**

Dipen Mehta, Chief Compliance Officer, is generally responsible for supervising Christopher P. Condle's advisory activities on behalf of Invst. Mr. Mehta can be reached at the firm's main telephone number listed on the cover page of this Brochure Supplement.

Invst supervises its personnel and the investments made in client accounts. Invst monitors the investments recommended by Christopher P. Condle to ensure they are suitable for the particular client and consistent with their investment needs, goals, objectives, and risk tolerance, as well as any restrictions previously requested by the client. Invst periodically reviews the advisory activities of Christopher P. Condle, which may include reviewing individual client accounts and correspondence (including e-mails) sent and received by Christopher P. Condle.

# Brochure Supplement



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02.15.2023

## Camryn Olson

3625 E. 96th Street  
Indianapolis, Indiana 46240

(317) 202-1891

This Brochure Supplement provides information about Camryn Olson that supplements the Disclosure Brochure of Invst, LLC (hereinafter "Invst"), a copy of which you should have received. Please contact Invst's Chief Compliance Officer if you did not receive the Disclosure Brochure or if you have any questions about the contents of this Brochure Supplement. Additional information about Joshua Peters is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Invst, LLC, a Registered Investment Adviser**

3625 E. 96th Street, Indianapolis, Indiana 46240 | (317) 202-1891  
[www.invst.com](http://www.invst.com)

### Item 2. Educational Background and Business Experience

Born 1999

#### Post-Secondary Education

Hillsdale College | BA Finance & Financial Management Services | 2022

#### Recent Business Background

Invst, LLC | Advisor | January 2023 – Present

Olson and Wilson Private Capital | Advisor | May 2022 – January 2023

### Item 3. Disciplinary Information

Invst is required to disclose information regarding any legal or disciplinary events material to a client's evaluation of Camryn Olson. Invst has no information to disclose in relation to this Item.

### Item 4. Other Business Activities

Invst is required to disclose information regarding any investment-related business or occupation in which Camryn Olson is actively engaged. Invst has no information to disclose in relation to this Item.

### Item 5. Additional Compensation

Invst is required to disclose information regarding any arrangement under which Camryn Olson receives an economic benefit from someone other than a client for providing investment advisory services. Invst has no information to disclose in relation to this Item.

### Item 6. Supervision

Dipen Mehta, Chief Compliance Officer, is generally responsible for supervising Camryn Olson's advisory activities on behalf of Invst. Mr. Mehta can be reached at the firm's main telephone number listed on the cover page of this Brochure Supplement.

Invst supervises its personnel and the investments made in client accounts. Invst monitors the investments recommended by Camryn Olson to ensure they are suitable for the particular client and consistent with their investment needs, goals, objectives and risk tolerance, as well as any restrictions previously requested by the client. Invst periodically reviews the advisory activities of Camryn Olson, which may include reviewing individual client accounts and correspondence (including e-mails) sent and received by Camryn Olson.

# Brochure Supplement



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07.07.2022

## Jonathan McCarty

3625 E. 96th Street  
Indianapolis, Indiana 46240

(317) 202-1891

This Brochure Supplement provides information about Jonathan McCarty that supplements the Disclosure Brochure of Invst, LLC (hereinafter "Invst"), a copy of which you should have received. Please contact Invst's Chief Compliance Officer if you did not receive the Disclosure Brochure or if you have any questions about the contents of this Brochure Supplement. Additional information about Jonathan McCarty is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Invst, LLC, a Registered Investment Adviser**

3625 E. 96th Street, Indianapolis, Indiana 46240 | (317) 202-1891  
[www.invst.com](http://www.invst.com)

## Item 2. Educational Background and Business Experience

### Post-Secondary Education

Purdue University | B.S. Business Administration and Management | 2005

### Recent Business Background

Invst, LLC | Advisor | May 2016 – Present

Independent | Financial Advisor | August 2005 - Present

### Professional Designation

Supervised Person holds the professional designation CERTIFIED FINANCIAL PLANNER™ (“CFP®”).

The CFP® certification is a financial planning credential awarded by the Certified Financial Planner Board of Standards Inc. (the “CFP Board”) to individuals who meet its education, examination, experience and ethics requirements. Eligible candidates are generally required to have three years of financial planning related experience and possess a bachelor’s degree from an accredited U.S. college or university. Certificants are further required to complete a CFP Board-Registered Education Program (or possess a qualifying professional credential), clear a personal and professional background check, and pass the CFP® Certification Examination, a ten-hour multiple choice exam divided into three separate sessions. In order to maintain the certification, CFP® designees must also complete at least 30 hours of continuing education every two years on an ongoing basis.

Supervised Person holds the professional designation CERTIFIED EXIT PLANNING ADVISOR (“CEPA®”).

The Certified Exit Planning Advisor (CEPA) credential is for professional advisors who want to effectively engage more business owners. Through the process of Exit Planning (the Value Acceleration Methodology), owners can build more valuable companies, have stronger personal financial plans, and align their personal goals. Earning CEPA doesn't change your expertise, it enhances your ability to engage business owners and have value-added conversations around growth and exit.

### **Item 3. Disciplinary Information**

Invst is required to disclose information regarding any legal or disciplinary events material to a client's evaluation of Jonathan McCarty. Invst has no information to disclose in relation to this Item.

### **Item 4. Other Business Activities**

Invst is required to disclose information regarding any investment-related business or occupation in which Jonathan McCarty is actively engaged. Invst has no information to disclose in relation to this Item.

### **Item 5. Additional Compensation**

Invst is required to disclose information regarding any arrangement under which Jonathan McCarty receives an economic benefit from someone other than a client for providing investment advisory services. Invst has no information to disclose in relation to this Item.

### **Item 6. Supervision**

Dipen Mehta, Chief Compliance Officer, is generally responsible for supervising Jonathan McCarty's advisory activities on behalf of Invst. Mr. Mehta can be reached at the firm's main telephone number listed on the cover page of this Brochure Supplement.

Invst supervises its personnel and the investments made in client accounts. Invst monitors the investments recommended by Jonathan McCarty to ensure they are suitable for the particular client and consistent with their investment needs, goals, objectives, and risk tolerance, as well as any restrictions previously requested by the client. Invst periodically reviews the advisory activities of Jonathan McCarty, which may include reviewing individual client accounts and correspondence (including e-mails) sent and received by Jonathan McCarty.



# Brochure Supplement



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07.07.2022

## Ryan Bradley

3625 E. 96th Street  
Indianapolis, Indiana 46240

(317) 202-1891

This Brochure Supplement provides information about Ryan Bradley that supplements the Disclosure Brochure of Invst, LLC (hereinafter "Invst"), a copy of which you should have received. Please contact Invst's Chief Compliance Officer if you did not receive the Disclosure Brochure or if you have any questions about the contents of this Brochure Supplement. Additional information about Ryan Bradley is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Invst, LLC, a Registered Investment Adviser**

3625 E. 96th Street, Indianapolis, Indiana 46240 | (317) 202-1891  
[www.invst.com](http://www.invst.com)

### Item 2. Educational Background and Business Experience

#### Post-Secondary Education

Butler University | B.S. Finance | 2018

#### Recent Business Background

Invst, LLC | Advisor | April 2022 – Present

SEI Archway | Investment Accountant | March 2019 – April 2022

Bank of America Merrill Lynch | Client Associate | July 2018 – March 2019

### Item 3. Disciplinary Information

Invst is required to disclose information regarding any legal or disciplinary events material to a client's evaluation of Ryan Bradley. Invst has no information to disclose in relation to this Item.

### Item 4. Other Business Activities

Invst is required to disclose information regarding any investment-related business or occupation in which Ryan Bradley is actively engaged. Invst has no information to disclose in relation to this Item.

### **Item 5. Additional Compensation**

Invst is required to disclose information regarding any arrangement under which Ryan Bradley receives an economic benefit from someone other than a client for providing investment advisory services. Invst has no information to disclose in relation to this Item.

### **Item 6. Supervision**

Dipen Mehta, Chief Compliance Officer, is generally responsible for supervising Ryan Bradley's advisory activities on behalf of Invst. Mr. Mehta can be reached at the firm's main telephone number listed on the cover page of this Brochure Supplement.

Invst supervises its personnel and the investments made in client accounts. Invst monitors the investments recommended by Ryan Bradley to ensure they are suitable for the particular client and consistent with their investment needs, goals, objectives, and risk tolerance, as well as any restrictions previously requested by the client. Invst periodically reviews the advisory activities of Ryan Bradley, which may include reviewing individual client accounts and correspondence (including e-mails) sent and received by Ryan Bradley.

# Brochure Supplement



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06.09.2022

## Justin T. Brammer

3625 E. 96th Street  
Indianapolis, Indiana 46240

(317) 202-1891

This Brochure Supplement provides information about Justin T. Brammer that supplements the Disclosure Brochure of Invst, LLC (hereinafter "Invst"), a copy of which you should have received. Please contact Invst's Chief Compliance Officer if you did not receive the Disclosure Brochure or if you have any questions about the contents of this Brochure Supplement. Additional information about Justin Brammer is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Invst, LLC, a Registered Investment Adviser**

3625 E. 96th Street, Indianapolis, Indiana 46240 | (317) 202-1891  
[www.invst.com](http://www.invst.com)

### Item 2. Educational Background and Business Experience

Born 1990

#### Post-Secondary Education

Bob Jones University | B.S., Business Finance | 2012

#### Recent Business Background

Invst, LLC | Investment Advisor Representative | April 2018 – Present

Jarred Bunch Consulting, LLC | Insurance Specialist | October 2017 –April 2018

Park Avenue Securities LLC | Registered Representative | June 2016 –October 2017

Horizon Planning Group | Financial Representative | May 2012 –October 2017

### Item 3. Disciplinary Information

Invst is required to disclose information regarding any legal or disciplinary events material to a client's evaluation of Justin T. Brammer. Invst has no information to disclose in relation to this Item.

### Item 4. Other Business Activities

Invst is required to disclose information regarding any investment-related business or occupation in which Justin T. Brammer is actively engaged. Invst has no information to disclose in relation to this Item.

### Item 5. Additional Compensation

Invst is required to disclose information regarding any arrangement under which Justin T. Brammer receives an economic benefit from someone other than a client for providing investment advisory services. Invst has no information to disclose in relation to this Item.

### Item 6. Supervision

Dipen Mehta, Chief Compliance Officer, is generally responsible for supervising Justin T. Brammer's advisory activities on behalf of Invst. Mr. Mehta can be reached at the firm's main telephone number listed on the cover page of this Brochure Supplement.

Invst supervises its personnel and the investments made in client accounts. Invst monitors the investments recommended by Justin T. Brammer to ensure they are suitable for the particular client and consistent with their investment needs, goals, objectives and risk tolerance, as well as any restrictions previously requested by the client. Invst periodically reviews the advisory activities of Justin T. Brammer, which may include reviewing individual client accounts and correspondence (including e-mails) sent and received by Justin T. Brammer.

# Brochure Supplement



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06.09.2022

## Branden Bunch

8470 Enterprise Circle  
Suite 311, Lakewood  
Ranch, FL 34202

(941) 281-4966

This Brochure Supplement provides information about Branden Bunch that supplements the Disclosure Brochure of Invst, LLC (hereinafter "Invst"), a copy of which you should have received. Please contact Invst's Chief Compliance Officer if you did not receive the Disclosure Brochure or if you have any questions about the contents of this Brochure Supplement. Additional information about Branden Bunch is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Invst, LLC, a Registered Investment Adviser**

3625 E. 96th Street, Indianapolis, Indiana 46240 | (317) 202-1891  
[www.invst.com](http://www.invst.com)

### Item 2. Educational Background and Business Experience

Born 1978

#### Post-Secondary Education

The American College | Chartered Financial Consultant | 2013

The American College | Chartered Life Underwriter | 2011

#### Recent Business Background

Invst, LLC | Investment Advisor Representative | September 2018 – Present

Branden G. Bunch, Inc. | Self Employed/Agency Manager | May2008 –September 2018

#### Professional Designation

Branden Bunch holds the professional designation of Chartered Financial Consultant (“ChFC®”)

The ChFC® designation is a financial planning credential awarded by the American College to individuals who satisfy its educational, work experience and ethics requirements. Recipients of the ChFC® certification have completed at least seven mandatory college-level courses in the areas of financial, insurance, retirement and/or estate planning, as well as income taxation and/or investments. Additionally, recipients have completed at least two elective courses on the financial system, estate planning applications, executive compensation, and/or retirement decisions. In order to maintain the designation, ChFC® holders must satisfy the ongoing requirements of the Professional Achievement in Continuing Education (“PACE”) Recertification Program, which includes 30 hours of continuing education at least every two years.

For additional information about this credential, please refer directly to the website of the issuing organization.

### Item 3. Disciplinary Information

Invst is required to disclose information regarding any legal or disciplinary events material to a client's evaluation of Branden Bunch. Invst has no information to disclose in relation to this Item.

### Item 4. Other Business Activities

Invst is required to disclose information regarding any investment-related business or occupation in which Branden Bunch is actively engaged. Invst has no information to disclose in relation to this Item.

### **Item 5. Additional Compensation**

Invst is required to disclose information regarding any arrangement under which Branden Bunch receives an economic benefit from someone other than a client for providing investment advisory services. Invst has no information to disclose in relation to this Item.

### **Item 6. Supervision**

Dipen Mehta, Chief Compliance Officer, is generally responsible for supervising Branden Bunch's advisory activities on behalf of Invst. Mr. Mehta can be reached at 317-202-1891.

Invst supervises its personnel and the investments made in client accounts. Invst monitors the investments recommended by Branden Bunch to ensure they are suitable for the particular client and consistent with their investment needs, goals, objectives, and risk tolerance, as well as any restrictions previously requested by the client. Invst periodically reviews the advisory activities of Branden Bunch, which may include reviewing individual client accounts and correspondence (including e-mails) sent and received by Branden Bunch.



# Brochure Supplement



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01.01.2023

## Everett Blake Bunch

3625 E. 96th Street  
Indianapolis, Indiana 46240

(317) 202-1891

This Brochure Supplement provides information about Everett Blake Bunch that supplements the Disclosure Brochure of Invst, LLC (hereinafter "Invst"), a copy of which you should have received. Please contact Invst's Chief Compliance Officer if you did not receive the Disclosure Brochure or if you have any questions about the contents of this Brochure Supplement. Additional information about Joshua Peters is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Invst, LLC, a Registered Investment Adviser**

3625 E. 96th Street, Indianapolis, Indiana 46240 | (317) 202-1891  
[www.invst.com](http://www.invst.com)

### Item 2. Educational Background and Business Experience

Born 1994

#### Post-Secondary Education

University of Central Florida | Bachelor of Science | 2019

#### Recent Business Background

Invst, LLC | Advisor | January 2020 – Present

Northwestern Mutual | Representative | January 2019 to January 2020

### Item 3. Disciplinary Information

Invst is required to disclose information regarding any legal or disciplinary events material to a client's evaluation of Everett Blake Bunch. Invst has no information to disclose in relation to this Item.

### Item 4. Other Business Activities

Invst is required to disclose information regarding any investment-related business or occupation in which Everett Blake Bunch is actively engaged. Invst has no information to disclose in relation to this Item.

### Item 5. Additional Compensation

Invst is required to disclose information regarding any arrangement under which Everett Blake Bunch receives an economic benefit from someone other than a client for providing investment advisory services. Invst has no information to disclose in relation to this Item.

### Item 6. Supervision

Dipen Mehta, Chief Compliance Officer, is generally responsible for supervising Everett Blake Bunch's advisory activities on behalf of Invst. Mr. Mehta can be reached at the firm's main telephone number listed on the cover page of this Brochure Supplement.

Invst supervises its personnel and the investments made in client accounts. Invst monitors the investments recommended by Everett Blake Bunch to ensure they are suitable for the particular client and consistent with their investment needs, goals, objectives and risk tolerance, as well as any restrictions previously requested by the client. Invst periodically reviews the advisory activities of Everett Blake Bunch, which may include reviewing individual client accounts and correspondence (including e-mails) sent and received by Everett Blake Bunch.

# Brochure Supplement



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07.07.2022

## Phillip Clark

3625 E. 96th Street  
Indianapolis, Indiana 46240

(317) 202-1891

This Brochure Supplement provides information about Phillip Clark that supplements the Disclosure Brochure of Invst, LLC (hereinafter "Invst"), a copy of which you should have received. Please contact Invst's Chief Compliance Officer if you did not receive the Disclosure Brochure or if you have any questions about the contents of this Brochure Supplement. Additional information about Phillip Clark is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Invst, LLC, a Registered Investment Adviser**

3625 E. 96th Street, Indianapolis, Indiana 46240 | (317) 202-1891  
[www.invst.com](http://www.invst.com)

## Item 2. Educational Background and Business Experience

### Post-Secondary Education

Purdue University | B.A.- Audiology and Speech Language Sciences | 2008

### Recent Business Background

Invst, LLC | Advisor | September 2016 – Present

Foresight Financial Management | Registered Representative | December 2013 – September 2016

Financial Partners Group | Registered Representative | June 2012 – December 2013

Horizon Planning Group | Registered Representative | January 2009 – June 2012

## Item 3. Disciplinary Information

Invst is required to disclose information regarding any legal or disciplinary events material to a client's evaluation of Phillip Clark. Invst has no information to disclose in relation to this Item.

## Item 4. Other Business Activities

Invst is required to disclose information regarding any investment-related business or occupation in which Phillip Clark is actively engaged. Invst has no information to disclose in relation to this Item.

### **Item 5. Additional Compensation**

Invst is required to disclose information regarding any arrangement under which Phillip Clark receives an economic benefit from someone other than a client for providing investment advisory services. Invst has no information to disclose in relation to this Item.

### **Item 6. Supervision**

Dipen Mehta, Chief Compliance Officer, is generally responsible for supervising Phillip Clark's advisory activities on behalf of Invst. Mr. Mehta can be reached at the firm's main telephone number listed on the cover page of this Brochure Supplement.

Invst supervises its personnel and the investments made in client accounts. Invst monitors the investments recommended by Phillip Clark to ensure they are suitable for the particular client and consistent with their investment needs, goals, objectives, and risk tolerance, as well as any restrictions previously requested by the client. Invst periodically reviews the advisory activities of Phillip Clark, which may include reviewing individual client accounts and correspondence (including e-mails) sent and received by Phillip Clark.

# Brochure Supplement



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06.09.2022

## Thomas Cudahy

3625 E. 96th Street  
Indianapolis, Indiana 46240

(317) 202-1891

This Brochure Supplement provides information about Thomas Cudahy that supplements the Disclosure Brochure of Invst, LLC (hereinafter "Invst"), a copy of which you should have received. Please contact Invst's Chief Compliance Officer if you did not receive the Disclosure Brochure or if you have any questions about the contents of this Brochure Supplement. Additional information about Thomas Cudahy is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Invst, LLC, a Registered Investment Adviser**

3625 E. 96th Street, Indianapolis, Indiana 46240 | (317) 202-1891  
[www.invst.com](http://www.invst.com)

### Item 2. Educational Background and Business Experience

Born 1982

#### Post-Secondary Education

University of Southern California | Bachelor of Arts, Communications | 2004

Purdue Krannert School of Management | MBA, Operations | 2011

#### Recent Business Background

Invst, LLC | Investment Advisor Representative | January 2019 – Present

New York Life | Agent | June 2013 – January 2019

#### Professional Designation

Supervised Person holds the professional designation CERTIFIED FINANCIAL PLANNER™ (“CFP®”).

The CFP® certification is a financial planning credential awarded by the Certified Financial Planner Board of Standards Inc. (the “CFP Board”) to individuals who meet its education, examination, experience and ethics requirements. Eligible candidates are generally required to have three years of financial planning related experience and possess a bachelor's degree from an accredited U.S. college or university. Certificants are further required to complete a CFP Board-Registered Education Program (or possess a qualifying professional credential), clear a personal and professional background check, and pass the CFP® Certification Examination, a ten-hour multiple-choice exam divided into three separate sessions. In order to maintain the certification, CFP® designees must also complete at least 30 hours of continuing education every two years on an ongoing basis.

### Item 3. Disciplinary Information

Invst is required to disclose information regarding any legal or disciplinary events material to a client's evaluation of Thomas Cudahy. Invst has no information to disclose in relation to this Item.

### Item 4. Other Business Activities

Invst is required to disclose information regarding any investment-related business or occupation in which Thomas Cudahy is actively engaged. Invst has no information to disclose in relation to this Item.

### **Item 5. Additional Compensation**

Invst is required to disclose information regarding any arrangement under which Thomas Cudahy receives an economic benefit from someone other than a client for providing investment advisory services. Invst has no information to disclose in relation to this Item.

### **Item 6. Supervision**

Dipen Mehta, Chief Compliance Officer, is generally responsible for supervising Thomas Cudahy's advisory activities on behalf of Invst. Mr. Mehta can be reached at the firm's main telephone number listed on the cover page of this Brochure Supplement.

Invst supervises its personnel and the investments made in client accounts. Invst monitors the investments recommended by Thomas Cudahy to ensure they are suitable for the particular client and consistent with their investment needs, goals, objectives and risk tolerance, as well as any restrictions previously requested by the client. Invst periodically reviews the advisory activities of Thomas Cudahy, which may include reviewing individual client accounts and correspondence (including e-mails) sent and received by Thomas Cudahy.



# Brochure Supplement



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06.09.2022

## Deborah Darchi

610 Clarendon St.  
Oldsmar, FL 34677

(813) 230-6619

This Brochure Supplement provides information about Deborah Darchi that supplements the Disclosure Brochure of Invst, LLC (hereinafter "Invst"), a copy of which you should have received. Please contact Invst's Chief Compliance Officer if you did not receive the Disclosure Brochure or if you have any questions about the contents of this Brochure Supplement. Additional information about Deborah Darchi is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Invst, LLC, a Registered Investment Adviser**

3625 E. 96th Street, Indianapolis, Indiana 46240 | (317) 202-1891  
[www.invst.com](http://www.invst.com)

## Item 2. Educational Background and Business Experience

Born 1969

### Post-Secondary Education

College of Charleston | BS, Applied Math/Business | 1990

Lebanon Valley College | Actuarial Science

### Recent Business Background

Invst, LLC | Investment Advisor Representative | May 2021 – Present

ProVise Management Group LLC | Financial Planner | October 2015 – April 2021

Cetera Financial Services | Financial Planner | September 2011 – September 2015

### Professional Designation

Deborah Darchi holds the professional designations of CERTIFIED FINANCIAL PLANNER™ (“CFP®”) and Registered Social Security Analyst (RSSA).

The CFP® certification is a financial planning credential awarded by the Certified Financial Planner Board of Standards Inc. (the “CFP Board”) to individuals who meet its education, examination, experience and ethics requirements. Eligible candidates are generally required to have three years of financial planning related experience and possess a bachelor's degree from an accredited U.S. college or university. Certificants are further required to complete a CFP Board-Registered Education Program (or possess a qualifying professional credential), clear a personal and professional background check, and pass the CFP® Certification Examination, a ten-hour multiple-choice exam divided into three separate sessions. In order to maintain the certification, CFP® designees must also complete at least 30 hours of continuing education every two years on an ongoing basis.

The RSSA certification is a financial planning credential awarded by the National Association of Registered Social Security Analysts to individuals who meet its educational, professional, and examination requirements. Eligible candidates are required to have one of the following professional designations: insurance license; FINRA registration; IRS registration, or CPA, CFP, EA, attorney, or other professional license issued by a state agency. Certificants complete a five-module self-study tutorial program that must be taken sequentially and requires passing an examination at the end of each module. Certificates then have to pass a final three-hour exam conducted in-person. Each RSSA designee must also complete four credits in continuing education every calendar year.

For additional information about each of these credentials, please refer directly to the website of the issuing organization.

### **Item 3. Disciplinary Information**

Invst is required to disclose information regarding any legal or disciplinary events material to a client's evaluation of Deborah Darchi. Invst has no information to disclose in relation to this Item.

### **Item 4. Other Business Activities**

Invst is required to disclose information regarding any investment-related business or occupation in which Deborah Darchi is actively engaged. Deborah Darchi manages a non-investment related business Debbie Dee LLC.

### **Item 5. Additional Compensation**

Invst is required to disclose information regarding any arrangement under which Deborah Darchi receives an economic benefit from someone other than a client for providing investment advisory services. Invst has no information to disclose in relation to this Item.

### **Item 6. Supervision**

Dipen Mehta, Chief Compliance Officer, is generally responsible for supervising Deborah Darchi's advisory activities on behalf of Invst. Mr. Mehta can be reached at the firm's main telephone number listed on the cover page of this Brochure Supplement.

Invst supervises its personnel and the investments made in client accounts. Invst monitors the investments recommended by Deborah Darchi to ensure they are suitable for the particular client and consistent with their investment needs, goals, objectives and risk tolerance, as well as any restrictions previously requested by the client. Invst periodically reviews the advisory activities of Deborah Darchi, which may include reviewing individual client accounts and correspondence (including e-mails) sent and received by Deborah Darchi.

# Brochure Supplement



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06.09.2022

## Lloyd R. Easters

3625 E. 96th Street  
Indianapolis, Indiana 46240

(317) 202-1891

This Brochure Supplement provides information about Lloyd R. Easters that supplements the Disclosure Brochure of Invst, LLC (hereinafter "Invst"), a copy of which you should have received. Please contact Invst's Chief Compliance Officer if you did not receive the Disclosure Brochure or if you have any questions about the contents of this Brochure Supplement. Additional information about Lloyd R. Easters is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Invst, LLC, a Registered Investment Adviser**

3625 E. 96th Street, Indianapolis, Indiana 46240 | (317) 202-1891  
[www.invst.com](http://www.invst.com)

### Item 2. Educational Background and Business Experience

Born 1968

#### Post-Secondary Education

Butler University | MBA, Business | 1998

University of Alabama at Birmingham | BS, Marketing | 1992

#### Recent Business Background

Invst, LLC | Chief Investment Officer and Investment Adviser Representative | April 2016 – Present

Park Avenue Securities LLC | Registered Representative | September 2014 –April 2016

American Homes for Rent | Assistant Vice President | November 2012 –January 2015

### Item 3. Disciplinary Information

Invst is required to disclose information regarding any legal or disciplinary events material to a client's evaluation of Lloyd R. Easters. Invst has no information to disclose in relation to this Item.

### Item 4. Other Business Activities

Invst is required to disclose information regarding any investment-related business or occupation in which Lloyd R. Easters is actively engaged. Lloyd R. Easters performs business and financial coaching and online/virtual courses on a part time basis.

### Item 5. Additional Compensation

Invst is required to disclose information regarding any arrangement under which Lloyd R. Easters receives an economic benefit from someone other than a client for providing investment advisory services. Invst has no information to disclose in relation to this Item.

### Item 6. Supervision

Dipen Mehta, Chief Compliance Officer, is generally responsible for supervising Lloyd R. Easters's advisory activities on behalf of Invst. Mr. Mehta can be reached at the firm's main telephone number listed on the cover page of this Brochure Supplement. Invst supervises its personnel and the investments made in client accounts. Invst monitors the investments recommended by Lloyd R. Easters to ensure they are suitable for the particular client and consistent with their investment needs, goals, objectives and risk tolerance, as well as any restrictions previously requested by the client. Invst periodically reviews the advisory activities of Lloyd R. Easters, which may include reviewing individual client accounts and correspondence (including e-mails) sent and received by Lloyd R. Easters.

# Brochure Supplement



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03.01.2023

## Jeremy Francioli

3625 E. 96th Street  
Indianapolis, Indiana 46240

(317) 202-1891

This Brochure Supplement provides information about Jeremy Francioli that supplements the Disclosure Brochure of Invst, LLC (hereinafter "Invst"), a copy of which you should have received. Please contact Invst's Chief Compliance Officer if you did not receive the Disclosure Brochure or if you have any questions about the contents of this Brochure Supplement. Additional information about Joshua Peters is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Invst, LLC, a Registered Investment Adviser**

3625 E. 96th Street, Indianapolis, Indiana 46240 | (317) 202-1891  
[www.invst.com](http://www.invst.com)

## Item 2. Educational Background and Business Experience

Born 1978

### Post-Secondary Education

University of Wisconsin Stevens Point | BA | 2000

Marquette University | MBA | 2006

### Recent Business Background

Invst, LLC | Advisor | March 2023 – Present

Bangerter Financial | Advisor | April 2022 – February 2023

Bourne Financial Group | Advisor | August 2018 – April 2022

### Professional Designation

Supervised Person holds the professional designation CERTIFIED INVESTMENT MANAGEMENT ANALYST™ (“CIMA®”). Certified Investment Management Analyst (CIMA) certification is the peak international, technical portfolio construction program for investment consultants, analysts, financial advisors and wealth management professionals. CIMA certification continues to be the highest level of advanced investment education for client-facing advisors.

## Item 3. Disciplinary Information

Invst is required to disclose information regarding any legal or disciplinary events material to a client's evaluation of Jeremy Francioli. Invst has no information to disclose in relation to this Item.

### **Item 4. Other Business Activities**

Invst is required to disclose information regarding any investment-related business or occupation in which Jeremy Francioli is actively engaged. Jeremy has FL real estate license, he is a enrolled producing agent for Life Insurance, he is a 1031 Exchange consultant with 1031 Exchange Connection out of Bonita Springs, FL, he is an enrolled agent for tax preparation, and he is also a registered representative of PKS broker dealer. Jeremy dedicates 11-20 hours a week for all the outside business activities.

### **Item 5. Additional Compensation**

Invst is required to disclose information regarding any arrangement under which Jeremy Francioli receives an economic benefit from someone other than a client for providing investment advisory services. Invst has no information to disclose in relation to this Item.

### **Item 6. Supervision**

Dipen Mehta, Chief Compliance Officer, is generally responsible for supervising Jeremy Francioli's advisory activities on behalf of Invst. Mr. Mehta can be reached at the firm's main telephone number listed on the cover page of this Brochure Supplement.

Invst supervises its personnel and the investments made in client accounts. Invst monitors the investments recommended by Jeremy Francioli to ensure they are suitable for the particular client and consistent with their investment needs, goals, objectives and risk tolerance, as well as any restrictions previously requested by the client. Invst periodically reviews the advisory activities of Jeremy Francioli, which may include reviewing individual client accounts and correspondence (including e-mails) sent and received by Jeremy Francioli.



# Brochure Supplement



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07.07.2022

## Tim Hays

3625 E. 96th Street  
Indianapolis, Indiana 46240

(317) 202-1891

This Brochure Supplement provides information about Tim Hays that supplements the Disclosure Brochure of Invst, LLC (hereinafter "Invst"), a copy of which you should have received. Please contact Invst's Chief Compliance Officer if you did not receive the Disclosure Brochure or if you have any questions about the contents of this Brochure Supplement. Additional information about Tim Hays is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Invst, LLC, a Registered Investment Adviser**

3625 E. 96th Street, Indianapolis, Indiana 46240 | (317) 202-1891  
[www.invst.com](http://www.invst.com)

## Item 2. Educational Background and Business Experience

### Post-Secondary Education

University of Colorado Boulder | B.A. History | 2005

### Recent Business Background

Invst, LLC | Advisor | January 2021 – Present

Jackson | Regional VP, Registered Products | January 2012 – December 2020

Jackson | Regional VP, Guaranteed Products | July 2008 – December 2011

Jackson | Business Development Consultant | January 2008 – July 2008

### Professional Designation

Supervised Person holds the professional designation CERTIFIED FUND SPECIALIST™ (“CFS®”).

A certified fund specialist (CFS) has received a certification from the Institute of Business & Finance (IBF) for their expertise in mutual funds and the mutual fund industry. Requirements for the designation include passing the certified fund specialist exam. The CFS certification provides financial service professionals with the additional expertise needed for advising clients as to which mutual funds best suit their particular needs.

## Item 3. Disciplinary Information

Invst is required to disclose information regarding any legal or disciplinary events material to a client's evaluation of Tim Hays. Invst has no information to disclose in relation to this Item.

## Item 4. Other Business Activities

Invst is required to disclose information regarding any investment-related business or occupation in which Tim Hays is actively engaged. Invst has no information to disclose in relation to this Item.

### **Item 5. Additional Compensation**

Invst is required to disclose information regarding any arrangement under which Tim Hays receives an economic benefit from someone other than a client for providing investment advisory services. Invst has no information to disclose in relation to this Item.

### **Item 6. Supervision**

Dipen Mehta, Chief Compliance Officer, is generally responsible for supervising Tim Hays's advisory activities on behalf of Invst. Mr. Mehta can be reached at the firm's main telephone number listed on the cover page of this Brochure Supplement.

Invst supervises its personnel and the investments made in client accounts. Invst monitors the investments recommended by Tim Hays to ensure they are suitable for the particular client and consistent with their investment needs, goals, objectives, and risk tolerance, as well as any restrictions previously requested by the client. Invst periodically reviews the advisory activities of Tim Hays, which may include reviewing individual client accounts and correspondence (including e-mails) sent and received by Tim Hays.

# Brochure Supplement



MAKING MONEY WORK FOR PEOPLE

June 8, 2022

## Ryan Hoch

209 E Washington Cntr Rd  
Fort Wayne, IN 46825

(260) 471-7555

This Brochure Supplement provides information about Ryan Hoch that supplements the Disclosure Brochure of Invst, LLC (hereinafter "Invst"), a copy of which you should have received. Please contact Invst's Chief Compliance Officer if you did not receive the Disclosure Brochure or if you have any questions about the contents of this Brochure Supplement. Additional information about Ryan Hoch is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Invst, LLC, a Registered Investment Adviser**

3625 E. 96th Street, Indianapolis, Indiana 46240 | (317) 202-1891  
[www.invst.com](http://www.invst.com)

## Item 2. Educational Background and Business Experience

Born 1985

### Post-Secondary Education

Ball State University | BA, Risk Management | 2007

### Recent Business Background

Invst, LLC | Investment Advisor Representative | August 2018 – Present

Hoch Financial Services | Financial Advisor | January 2012 - Present

Hoch Insurance Agency, Inc. | Account Executive | June 2007 - Present

Park Avenue Securities | Registered Representative | June 2011 – July 2018

Guardian Life Insurance Company | Registered Representative | June 2011 – July 2018

### Professional Designation

Supervised Person holds the professional designation CERTIFIED FINANCIAL PLANNER™ (“CFP®”).

The CFP® certification is a financial planning credential awarded by the Certified Financial Planner Board of Standards Inc. (the “CFP Board”) to individuals who meet its education, examination, experience and ethics requirements. Eligible candidates are generally required to have three years of financial planning related experience and possess a bachelor’s degree from an accredited U.S. college or university. Certificants are further required to complete a CFP Board-Registered Education Program (or possess a qualifying professional credential), clear a personal and professional background check, and pass the CFP® Certification Examination, a ten-hour multiple choice exam divided into three separate sessions. In order to maintain the certification, CFP® designees must also complete at least 30 hours of continuing education every two years on an ongoing basis.

## Item 3. Disciplinary Information

Invst is required to disclose information regarding any legal or disciplinary events material to a client’s evaluation of Ryan Hoch. Invst has no information to disclose in relation to this Item.

## Item 4. Other Business Activities

Invst is required to disclose information regarding any investment-related business or occupation in which Ryan Hoch is actively engaged. Ryan Hoch is involved with Hoch Insurance Agency as well as a property investment company Hoch Properties.

### **Item 5. Additional Compensation**

Invst is required to disclose information regarding any arrangement under which Ryan Hoch receives an economic benefit from someone other than a client for providing investment advisory services. Invst has no information to disclose in relation to this Item.

### **Item 6. Supervision**

Dipen Mehta, Chief Compliance Officer, is generally responsible for supervising Ryan Hoch's advisory activities on behalf of Invst. Mr. Mehta can be reached at the firm's main telephone number listed on the cover page of this Brochure Supplement.

Invst supervises its personnel and the investments made in client accounts. Invst monitors the investments recommended by Ryan Hoch to ensure they are suitable for the particular client and consistent with their investment needs, goals, objectives and risk tolerance, as well as any restrictions previously requested by the client. Invst periodically reviews the advisory activities of Ryan Hoch, which may include reviewing individual client accounts and correspondence (including e-mails) sent and received by Ryan Hoch.

# Brochure Supplement



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07.07.2022

## Dipen Mehta

3625 E. 96th Street  
Indianapolis, Indiana 46240

(317) 202-1891

This Brochure Supplement provides information about Dipen Mehta that supplements the Disclosure Brochure of Invst, LLC (hereinafter "Invst"), a copy of which you should have received. Please contact Invst's Chief Compliance Officer if you did not receive the Disclosure Brochure or if you have any questions about the contents of this Brochure Supplement. Additional information about Dipen Mehta is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Invst, LLC, a Registered Investment Adviser**

3625 E. 96th Street, Indianapolis, Indiana 46240 | (317) 202-1891  
[www.invst.com](http://www.invst.com)

## Item 2. Educational Background and Business Experience

### Post-Secondary Education

Boston University | B.S. Computer Science | 1995

University of Chicago | Masters in Mathematics | 2006

Yale School of Management | Executive Program, Investment

Management Theory & Practice | 2021

### Recent Business Background

Invst, LLC | Chief Operating Officer | May 2021 – Present

C2P Enterprises | Executive VP of Technology & Operations | January 2019 – May 2021

Protectio Investments | CEO | March 2017 – January 2019

BGM TruNorth Wealth Partners | Director of Investment Operations, Technology, and Compliance |

November 2015 - March 2017

### Professional Designation

Supervised Person holds the professional designation CERTIFIED INVESTMENT MANAGEMENT ANALYST™ (“CIMA®”).

Certified Investment Management Analyst (CIMA) certification is the peak international, technical portfolio construction program for investment consultants, analysts, financial advisors and wealth management professionals. CIMA certification continues to be the highest level of advanced investment education for client-facing advisors.

Supervised Person holds the professional designation ACCREDITED INVESTMENT FIDUCIARY™ (“AIF®”).

The Accredited Investment Fiduciary (AIF) Designation is a professional certification that demonstrates an advisor or other person serving as an investment fiduciary has met certain requirements to earn and maintain the credential. The purpose of the AIF Designation is to assure that those responsible for managing or advising on investor assets have the fundamental understanding of the principles of fiduciary duty, the standards of conduct for acting as a fiduciary, and a process for carrying out fiduciary responsibility.



### **Item 3. Disciplinary Information**

Invst is required to disclose information regarding any legal or disciplinary events material to a client's evaluation of Dipen Mehta. Invst has no information to disclose in relation to this Item.

### **Item 4. Other Business Activities**

Invst is required to disclose information regarding any investment-related business or occupation in which Dipen Mehta is actively engaged. Invst has no information to disclose in relation to this item.

### **Item 5. Additional Compensation**

Invst is required to disclose information regarding any arrangement under which Dipen Mehta receives an economic benefit from someone other than a client for providing investment advisory services. Invst has no information to disclose in relation to this Item.

### **Item 6. Supervision**

Dipen Mehta, Chief Compliance Officer, is generally responsible for supervising Dipen Mehta's advisory activities on behalf of Invst. Mr. Mehta can be reached at the firm's main telephone number listed on the cover page of this Brochure Supplement.

Invst supervises its personnel and the investments made in client accounts. Invst monitors the investments recommended by Dipen Mehta to ensure they are suitable for the particular client and consistent with their investment needs, goals, objectives, and risk tolerance, as well as any restrictions previously requested by the client. Invst periodically reviews the advisory activities of Dipen Mehta, which may include reviewing individual client accounts and correspondence (including e-mails) sent and received by Dipen Mehta.

# Brochure Supplement



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07.07.2022

## Donald Thomas

3625 E. 96th Street  
Indianapolis, Indiana 46240

(317) 202-1891

This Brochure Supplement provides information about Donald Thomas that supplements the Disclosure Brochure of Invst, LLC (hereinafter "Invst"), a copy of which you should have received. Please contact Invst's Chief Compliance Officer if you did not receive the Disclosure Brochure or if you have any questions about the contents of this Brochure Supplement. Additional information about Donald Thomas is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Invst, LLC, a Registered Investment Adviser**

3625 E. 96th Street, Indianapolis, Indiana 46240 | (317) 202-1891  
[www.invst.com](http://www.invst.com)

## Item 2. Educational Background and Business Experience

### Post-Secondary Education

University of Connecticut | B.S. Political Science | 2007

### Recent Business Background

Invst, LLC | Advisor | October 2020 – Present

Rita's Italian Ice | Owner | January 2016 - Present

Pro X Athlete Development | Offensive Lineman Trainer | January 2019 - Present

NFL | Offensive Lineman | January 2008 – December 2015

## Item 3. Disciplinary Information

Invst is required to disclose information regarding any legal or disciplinary events material to a client's evaluation of Donald Thomas. Invst has no information to disclose in relation to this Item.

## Item 4. Other Business Activities

Invst is required to disclose information regarding any investment-related business or occupation in which Donald Thomas is actively engaged. Invst has no information to disclose in relation to this Item.

### **Item 5. Additional Compensation**

Invst is required to disclose information regarding any arrangement under which Donald Thomas receives an economic benefit from someone other than a client for providing investment advisory services. Invst has no information to disclose in relation to this Item.

### **Item 6. Supervision**

Dipen Mehta, Chief Compliance Officer, is generally responsible for supervising Donald Thomas's advisory activities on behalf of Invst. Mr. Mehta can be reached at the firm's main telephone number listed on the cover page of this Brochure Supplement.

Invst supervises its personnel and the investments made in client accounts. Invst monitors the investments recommended by Donald Thomas to ensure they are suitable for the particular client and consistent with their investment needs, goals, objectives, and risk tolerance, as well as any restrictions previously requested by the client. Invst periodically reviews the advisory activities of Donald Thomas, which may include reviewing individual client accounts and correspondence (including e-mails) sent and received by Donald Thomas.

# Brochure Supplement



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07.07.2022

## Geoff Thomas

3625 E. 96th Street  
Indianapolis, Indiana 46240

(317) 202-1891

This Brochure Supplement provides information about Geoff Thomas that supplements the Disclosure Brochure of Invst, LLC (hereinafter "Invst"), a copy of which you should have received. Please contact Invst's Chief Compliance Officer if you did not receive the Disclosure Brochure or if you have any questions about the contents of this Brochure Supplement. Additional information about Geoff Thomas is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Invst, LLC, a Registered Investment Adviser**

3625 E. 96th Street, Indianapolis, Indiana 46240 | (317) 202-1891  
[www.invst.com](http://www.invst.com)

## Item 2. Educational Background and Business Experience

### Post-Secondary Education

University of Florida | B.A. Business Administration | 2003

### Recent Business Background

Invst, LLC | Advisor | October 2020 – Present

Financial Partners Group | Registered Representative | June 2020 – October 2020

Skyway Capital Markets | Regional VP of Sales | April 2019 – April 2020

SC Distributors | Regional VP of Sales | January 2017 – March 2019

## Item 3. Disciplinary Information

Invst is required to disclose information regarding any legal or disciplinary events material to a client's evaluation of Geoff Thomas. Invst has no information to disclose in relation to this Item.

## Item 4. Other Business Activities

Invst is required to disclose information regarding any investment-related business or occupation in which Geoff Thomas is actively engaged. Invst has no information to disclose in relation to this Item.

### **Item 5. Additional Compensation**

Invst is required to disclose information regarding any arrangement under which Geoff Thomas receives an economic benefit from someone other than a client for providing investment advisory services. Invst has no information to disclose in relation to this Item.

### **Item 6. Supervision**

Dipen Mehta, Chief Compliance Officer, is generally responsible for supervising Geoff Thomas's advisory activities on behalf of Invst. Mr. Mehta can be reached at the firm's main telephone number listed on the cover page of this Brochure Supplement.

Invst supervises its personnel and the investments made in client accounts. Invst monitors the investments recommended by Geoff Thomas to ensure they are suitable for the particular client and consistent with their investment needs, goals, objectives, and risk tolerance, as well as any restrictions previously requested by the client. Invst periodically reviews the advisory activities of Geoff Thomas, which may include reviewing individual client accounts and correspondence (including e-mails) sent and received by Geoff Thomas.

# Brochure Supplement



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06.09.2022

## Joel D. Thornton Jr.

120 East Pine St., Suite 9  
Lakeland, FL 33801

(863) 661-6887

This Brochure Supplement provides information about Joel D. Thornton Jr. that supplements the Disclosure Brochure of Invst, LLC (hereinafter "Invst"), a copy of which you should have received. Please contact Invst's Chief Compliance Officer if you did not receive the Disclosure Brochure or if you have any questions about the contents of this Brochure Supplement. Additional information about Joel Thornton Jr. is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Invst, LLC, a Registered Investment Adviser**

3625 E. 96th Street, Indianapolis, Indiana 46240 | (317) 202-1891  
[www.invst.com](http://www.invst.com)



### Item 2. Educational Background and Business Experience

Born 1983

#### Post-Secondary Education

Joel D. Thornton Jr. has no formal post-secondary education

#### Recent Business Background

Invst, LLC | Investment Advisor Representative | May 2019 – Present

Park Avenue Securities, LLC | Registered Representative | January 2009 – April 2019

### Item 3. Disciplinary Information

Invst is required to disclose information regarding any legal or disciplinary events material to a client's evaluation of Joel D. Thornton Jr.. Invst has no information to disclose in relation to this Item.

### Item 4. Other Business Activities

Invst is required to disclose information regarding any investment-related business or occupation in which Joel D. Thornton Jr. is actively engaged. Invst has no information to disclose in relation to this Item.

### Item 5. Additional Compensation

Invst is required to disclose information regarding any arrangement under which Joel D. Thornton Jr. receives an economic benefit from someone other than a client for providing investment advisory services. Invst has no information to disclose in relation to this Item.

### Item 6. Supervision

Dipen Mehta, Chief Compliance Officer, is generally responsible for supervising Joel D. Thornton Jr.'s advisory activities on behalf of Invst. Mr. Mehta can be reached at the firm's main telephone number listed on the cover page of this Brochure Supplement.

Invst supervises its personnel and the investments made in client accounts. Invst monitors the investments recommended by Joel D. Thornton Jr. to ensure they are suitable for the particular client and consistent with their investment needs, goals, objectives, and risk tolerance, as well as any restrictions previously requested by the client. Invst periodically reviews the advisory activities of Joel D. Thornton Jr., which may include reviewing individual client accounts and correspondence (including e-mails) sent and received by Joel D. Thornton Jr.

# Brochure Supplement



MAKING MONEY WORK FOR PEOPLE

06.09.2022

## Kristina Rodriguez

4830 W. Kennedy Blvd.  
Suite 888, Tampa, FL  
33609

(813) 282-8555

This Brochure Supplement provides information about Kristina Rodriguez that supplements the Disclosure Brochure of Invst, LLC (hereinafter "Invst"), a copy of which you should have received. Please contact Invst's Chief Compliance Officer if you did not receive the Disclosure Brochure or if you have any questions about the contents of this Brochure Supplement. Additional information about Kristina Rodriguez is on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Invst, LLC, a Registered Investment Adviser**

3625 E. 96th Street, Indianapolis, Indiana 46240 | (317) 202-1891  
[www.invst.com](http://www.invst.com)

### Item 2. Educational Background and Business Experience

Born 1978

#### Post-Secondary Education

Kristina Rodriguez has no formal post-secondary education.

#### Recent Business Background

Invst, LLC | Investment Advisor Representative | June 2017 – Present

Jarred Bunch Consulting, LLC | Paraplanner | August 2008 – June 2017

### Item 3. Disciplinary Information

Invst is required to disclose information regarding any legal or disciplinary events material to a client's evaluation of Kristina Rodriguez. Invst has no information to disclose in relation to this Item.

### Item 4. Other Business Activities

Invst is required to disclose information regarding any investment-related business or occupation in which Kristina Rodriguez is actively engaged. Kristina Rodriguez has several non-investment related outside businesses including KARR Solutions, KARR Transport, Team KARR coaching, Special D's Balls, and is board member of Love is Fur Ever Dog Rescue and Know Cares.

### **Item 5. Additional Compensation**

Invst is required to disclose information regarding any arrangement under which Kristina Rodriguez receives an economic benefit from someone other than a client for providing investment advisory services. Invst has no information to disclose in relation to this Item.

### **Item 6. Supervision**

Dipen Mehta, Chief Compliance Officer, is generally responsible for supervising Kristina Rodriguez's advisory activities on behalf of Invst. Mr. Mehta can be reached at (317) 202-1891 or at [dipen@invst.com](mailto:dipen@invst.com).

Invst supervises its personnel and the investments made in client accounts. Invst monitors the investments recommended by Kristina Rodriguez to ensure they are suitable for the particular client and consistent with their investment needs, goals, objectives, and risk tolerance, as well as any restrictions previously requested by the client. Invst periodically reviews the advisory activities of Kristina Rodriguez, which may include reviewing individual client accounts and correspondence (including e-mails) sent and received by Kristina Rodriguez.

# Brochure Supplement



MAKING MONEY WORK FOR PEOPLE

07.07.2022

## Peter Welsh

3625 E. 96th Street  
Indianapolis, Indiana 46240

(317) 202-1891

This Brochure Supplement provides information about Peter Welsh that supplements the Disclosure Brochure of Invst, LLC (hereinafter "Invst"), a copy of which you should have received. Please contact Invst's Chief Compliance Officer if you did not receive the Disclosure Brochure or if you have any questions about the contents of this Brochure Supplement. Additional information about Peter Welsh is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Invst, LLC, a Registered Investment Adviser**

3625 E. 96th Street, Indianapolis, Indiana 46240 | (317) 202-1891  
[www.invst.com](http://www.invst.com)

## Item 2. Educational Background and Business Experience

### Post-Secondary Education

University of Notre Dame | BBA Finance | 1988

Indiana University | JD, Tax and Business Law | 1994

### Recent Business Background

Invst, LLC | Advisor | November 2019 – Present

Millennium Trust Company | Senior VP Retirement Services | September 2020 - Present

Thruston, Springer, Miller, Herd, & Titak | Director of Retirement Services | March 2019 – November 2019

OneAmerica Retirement Services | VP and Managing Principal | January 2010 – December 2018

### Professional Designation

Supervised Person holds the professional designation CERTIFIED FINANCIAL PLANNER™ (“CFP®”).

The CFP® certification is a financial planning credential awarded by the Certified Financial Planner Board of Standards Inc. (the “CFP Board”) to individuals who meet its education, examination, experience and ethics requirements. Eligible candidates are generally required to have three years of financial planning related experience and possess a bachelor’s degree from an accredited U.S. college or university. Certificants are further required to complete a CFP Board-Registered Education Program (or possess a qualifying professional credential), clear a personal and professional background check, and pass the CFP® Certification Examination, a ten-hour multiple choice exam divided into three separate sessions. In order to maintain the certification, CFP® designees must also complete at least 30 hours of continuing education every two years on an ongoing basis.

## Item 3. Disciplinary Information

Invst is required to disclose information regarding any legal or disciplinary events material to a client’s evaluation of Peter Welsh. Invst has no information to disclose in relation to this Item.

## Item 4. Other Business Activities

Invst is required to disclose information regarding any investment-related business or occupation in which Peter Welsh is actively engaged. Invst has no information to disclose in relation to this Item.

### **Item 5. Additional Compensation**

Invst is required to disclose information regarding any arrangement under which Peter Welsh receives an economic benefit from someone other than a client for providing investment advisory services. Invst has no information to disclose in relation to this Item.

### **Item 6. Supervision**

Dipen Mehta, Chief Compliance Officer, is generally responsible for supervising Peter Welsh's advisory activities on behalf of Invst. Mr. Mehta can be reached at the firm's main telephone number listed on the cover page of this Brochure Supplement.

Invst supervises its personnel and the investments made in client accounts. Invst monitors the investments recommended by Peter Welsh to ensure they are suitable for the particular client and consistent with their investment needs, goals, objectives, and risk tolerance, as well as any restrictions previously requested by the client. Invst periodically reviews the advisory activities of Peter Welsh, which may include reviewing individual client accounts and correspondence (including e-mails) sent and received by Peter Welsh.

# Brochure Supplement



MAKING MONEY WORK FOR PEOPLE

09.15.2022

## Barbara Dugan

3625 E. 96th Street  
Indianapolis, Indiana 46240

(317) 202-1891

This Brochure Supplement provides information about Barbara Dugan that supplements the Disclosure Brochure of Invst, LLC (hereinafter "Invst"), a copy of which you should have received. Please contact Invst's Chief Compliance Officer if you did not receive the Disclosure Brochure or if you have any questions about the contents of this Brochure Supplement. Additional information about Joshua Peters is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Invst, LLC, a Registered Investment Adviser**

3625 E. 96th Street, Indianapolis, Indiana 46240 | (317) 202-1891  
[www.invst.com](http://www.invst.com)



## Item 2. Educational Background and Business Experience

Born 1968

### Post-Secondary Education

University of Florida | BA History | 1990

### Recent Business Background

Invst, LLC | Retirement Services Manager | November 2021 – Present

ProVise Management Group | Retirement Plan Advisor | Feb 2013 – Oct 2021

Trademark Capital | Relationship Associate | May 2008 – Feb 2013

### Professional Designation

Supervised Person holds the professional designation ACCREDITED INVESTMENT FIDUCIARY™ (“AIF®”).

The Accredited Investment Fiduciary (AIF) Designation is a professional certification that demonstrates an advisor or other person serving as an investment fiduciary has met certain requirements to earn and maintain the credential. The purpose of the AIF Designation is to assure that those responsible for managing or advising on investor assets have the fundamental understanding of the principles of fiduciary duty, the standards of conduct for acting as a fiduciary, and a process for carrying out fiduciary responsibility.

## Item 3. Disciplinary Information

Invst is required to disclose information regarding any legal or disciplinary events material to a client's evaluation of Barbara Dugan. Invst has no information to disclose in relation to this Item.

## Item 4. Other Business Activities

Invst is required to disclose information regarding any investment-related business or occupation in which Barbara Dugan is actively engaged. Invst has no information to disclose in relation to this Item.

### **Item 5. Additional Compensation**

Invst is required to disclose information regarding any arrangement under which Barbara Dugan receives an economic benefit from someone other than a client for providing investment advisory services. Invst has no information to disclose in relation to this Item.

### **Item 6. Supervision**

Dipen Mehta, Chief Compliance Officer, is generally responsible for supervising Barbara Dugan's advisory activities on behalf of Invst. Mr. Mehta can be reached at the firm's main telephone number listed on the cover page of this Brochure Supplement.

Invst supervises its personnel and the investments made in client accounts. Invst monitors the investments recommended by Barbara Dugan to ensure they are suitable for the particular client and consistent with their investment needs, goals, objectives and risk tolerance, as well as any restrictions previously requested by the client. Invst periodically reviews the advisory activities of Barbara Dugan, which may include reviewing individual client accounts and correspondence (including e-mails) sent and received by Barbara Dugan.