

Magnifi, LLC (“Magnifi”, the “Firm” or “we”) is registered as an investment adviser with the Securities and Exchange Commission. Brokerage and investment advisory services and 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 [Investor.gov/CRS](https://www.investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers and investing.

What investment services and advice can you provide me?

Magnifi’s proprietary web-based technology provides a natural language powered platform which enables you to navigate the large and growing universe of exchange-traded funds (“ETFs”), mutual funds, and model portfolios, while using such information to build and/or enhance your existing portfolio. Magnifi’s algorithms use technology and science to personalize and facilitate discovery, comparison, and action in the investment process by generating investment alternatives based on your natural language searches, unique goals, investment types, risk tolerance, and other information you put into Magnifi’s website.

Pursuant to your investment advisory agreement with Magnifi (each, a “Subscription Agreement”), Magnifi provides investment alternatives and portfolio management support through our website with the objective of enabling you to personalize your investment preferences, receive analysis and/or comparisons of ETFs, mutual funds and model portfolios, and create and edit mock portfolios. You may also link your external brokerage accounts to the platform for easy access to trade execution. For an optional monthly Subscription Fee (as defined below), you may participate in Magnifi’s premium service plan (“Magnifi Premium”). As a Magnifi Premium client, you would have access to additional tools to further customize Magnifi’s interface, including the abilities to build your own calculators, enhance model portfolios, and print proposal reports.

Magnifi’s investment recommendations are based on financial and other information you submit through our website. Magnifi does not have discretionary authority over your account, which means we do not determine the securities that you buy or sell, the amount of securities that you buy or sell, the broker-dealer you use for your purchase or sale of securities, and commission rates that you pay to a broker-dealer in your account. You should be aware that your individual accounts are not actively monitored directly by investment advisory personnel.

Requirements to Open and Maintain an Account: Magnifi delivers certain access to information regarding ETFs and mutual funds without charge. Magnifi Premium subscribers have access to additional tools to further customize Magnifi’s interface, for a monthly subscription fee, as described further below. Prior to receiving investment alternatives from Magnifi, clients are also required to open an account on Magnifi’s online platform.

For additional information regarding our investment advisory services, please see Items 4 and 8 of our Form ADV Part 2A (our “Firm Brochure”).

CONVERSATION STARTERS. Questions you should ask investment advisers like us:

- *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?

Magnifi delivers certain access to information regarding ETFs and mutual funds at no charge. You may decide to pay an optional monthly subscription fee of \$500 (the “Subscription Fee”) through participation in Magnifi Premium. Fees are subject to negotiation and may vary among clients.

Magnifi’s fees do not include any custodial or brokerage expenses that a Client’s custodian or broker may charge. You will typically pay transaction and/or custodial expenses in connection with implementing any of Magnifi’s recommendations, in addition to the Subscription Fee paid to Magnifi by Magnifi Premium Clients. These transaction and/or custodial expenses vary and are based on your agreement with your account custodian and/or broker-dealer. Please refer to Item 5 of our Firm Brochure as well as your Subscription Agreement for a full disclosure of relevant fees, costs and expenses.

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.

CONVERSATION STARTER. A question you should ask investment advisers like us:

- *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?

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 about these conflicts because they can affect the investment advice we provide you.

For example, Magnifi enters into partnerships with various financial institutions that may be registered investment advisers to ETFs and/or mutual funds (collectively, the “Asset Managers”). Because of such partnerships, our platform is more likely to recommend the products of our Asset Manager partners as opposed to other investment products offered by other managers with which we have no affiliation and from which we do not receive fees. Magnifi allows Asset Managers to sponsor nodes resulting in such Asset Managers’ products being presented to clients first when searching for investment recommendations. Sponsored recommendations are identified as “Sponsored” in the search results. Such sponsorship does not imply that any such sponsored results are more appropriate for clients as compared to results presented after the sponsored results, only that such Asset Managers have paid for premium placement. Magnifi does not receive any additional compensation from the Asset Manager if you elect to invest with an Asset Manager (i.e. Magnifi only receives licensing fees from the Asset Manager regardless of whether you choose to invest with any such Asset Manager). You are strongly encouraged to conduct your own analysis and to consider your own individual circumstances, risk tolerances and needs prior to following any of Magnifi’s recommendations.

For additional information regarding our management of potential conflicts of interests, please see Item 10 of our Firm Brochure.

CONVERSATION STARTER. A question you should ask investment advisers like us:

- *How might your conflicts of interest affect me, and how will you address them?*

How do your financial professionals make money?

We do not employ financial professionals or financial advisors to provide investment advice. Our investment services are entirely managed by software. Magnifi’s sources of revenue include advertising revenue generated through partnerships with Asset Managers and the optional monthly Subscription Fee of \$500 through clients’ participation in Magnifi Premium. Our Asset Manager partners pay us digital platform licensing fees and sponsorship fees in exchange for making their products prominently available on our platform.

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

No. For further information, please visit Investor.gov/CRS for a free and simple search tool where you can research us and our financial professionals.

Additional Information

If you would like additional information about our services or to request a copy of the relationship summary, please contact us at hello@magnifi.com.

CONVERSATION STARTER. A question you should ask investment advisers like us:

- *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 this person if I have concerns about how this person is treating me?*