

**Item I. – Cover Page**

**Form ADV, Part 2A**

**Disclosure Brochure of  
Integrity Investors, LLC  
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St. Louis, MO 63128  
Tel: (314) 212-1404  
Fax: (314) 212-1406  
[www.integrityinvestors.com](http://www.integrityinvestors.com)**



**Dated: June 26, 2023**

This brochure provides information about the qualifications and business practices of Integrity, LLC. If you have any questions about the contents of this brochure, please contact us at (314) 212-1404 and [mark@integrityinvestors.com](mailto:mark@integrityinvestors.com). 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. Registration with the SEC or any state securities authority does not imply a certain level of skill or training.

Additional information about Integrity, LLC also is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov), using the Firm’s CRD No. 119272.

## **Item 2 - Material Changes**

### **Annual Update**

The Material Changes section of this brochure will be updated annually or when material changes occur since the previous release of the Firm Brochure.

### **Material Changes since the Last Update**

The Firm has had no material changes to report since its last ADV Annual Update Amendment dated March 30, 2023.

### **Full Brochure Available**

Each year we will deliver to you, by no later than April 30<sup>th</sup>, a free updated brochure that includes or is accompanied by a summary of material changes; or a summary of material changes and an offer to provide a copy of the updated brochure and how to obtain it.

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: at (314) 212-1404 or at [mark@integrityinvestors.com](mailto:mark@integrityinvestors.com).

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## **Item 4 - Advisory Business**

### *Firm Description*

Integrity Investors, L.L.C. is a state-registered investment adviser with its principal office located in Missouri. In California, Integrity Investors, L.L.C. conducts business under the name of Investors Integrity, L.L.C., hereinafter both are referred to herein as (“Integrity”). Integrity’s mission is to provide clients with personalized financial guidance, and the products and services needed to compliment and realize their financial potential. Integrity has been operating as an investment advisory firm since 2001.

### *Principal Owners*

Integrity’s principal owner is Mark A. Minnella.

### *Types of Advisory Services*

Integrity provides investment management services and furnishes investment advice through consultations. From time to time, Integrity may be asked to evaluate clients’ existing or potential investments in real estate, various limited partnerships, real estate partnerships, private placements, and real estate investment trusts (REITs). Integrity also may evaluate clients’ investments in insurance products, such as annuities.

Integrity also provides clients of other investment advisers such as G.A. Repple & Company (CRD# 17486) with biblically based investment screening and portfolio management services. Integrity may be engaged by an investment adviser for management of all or a portion of their client’s assets for biblically based investing.

Integrity offers the following investment advisory service for individuals:

### **ASSET MANAGEMENT**

Integrity will design a customized client asset allocation strategy that is consistent with the client’s investment objectives and risk tolerance. Portfolio development starts with an interview and confidential assessment to help identify an investment strategy that aligns with each client’s individual goals, values, and personal peace quotient. Integrity will help clients identify and set their financial goals. An individual’s established time frame before they will need the use of the assets in their portfolio is a primary indicator used to calculate the maximum exposure tolerances for asset classes and minimum thresholds for cash needs. We also believe an investor’s emotional connection with short-term market activity is as valid as any other determinate in portfolio design.

Integrity will transition the client from his or her current allocation to the recommended asset allocation strategy and thereafter, on an ongoing basis, will monitor the performance of a client’s portfolio and suggest rebalancing as necessary to conform to the recommended allocations. Integrity believes an investment strategy should help clients reach their desired future goal and provide confidence today. Integrity will strive to understand the client, their needs, and peace quotient, then fit an investment strategy to the uniqueness of their life.

Clients grant Integrity discretionary authority to determine the types of investments and the number, amount and timing of securities purchased or sold for their account.

Integrity is committed to recommending investments that do not actively contribute to the moral decline of our society. All investment opportunities are screened for Christian values and only those investments that do not promote abortion, pornography, anti-family entertainment, non-married lifestyles, alcohol, tobacco, or gambling are recommended.

Integrity acknowledges that under the Employment Retirement Income Security Act (ERISA) of 1974, as amended, that it is a "fiduciary" when the firm's services are subject to the provisions of ERISA. When Integrity provides investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours.

#### *Wrap Fee Programs*

The firm does not participate in any wrap fee programs.

#### *Assets Under Management*

Integrity provides investment advice to clients on a discretionary basis, and as of December 31, 2022, had assets under management of \$47,869,663. The firm does not have any non-discretionary assets under management.

#### *Termination of Advisory Agreement*

A client may terminate his or her Advisory Agreement without penalty or fee within five (5) business days after signing the Agreement. An Advisory Agreement also may be terminated by either the client or Integrity upon ten (10) days' prior written notice. Clients who terminate their Agreement will only be charged for a pro-rated portion of the month before termination in which services were provided and will receive a refund of any advisory fees paid but not earned.

### **Item 5 - Fees and Compensation**

#### **ASSET MANAGEMENT SERVICE FEE:**

Integrity's fee for its' asset management services is an annual fee charged as a percentage of the client's assets under the Firm's management. For accounts of \$100,000 or less, the Firm's fee is an annual fee of 2.00% and for accounts greater than \$100,000 the Firm's fee is negotiable for a lesser percentage in Integrity's sole discretion based on factors such as the amount of assets under Integrity's management exceeding \$100,000, anticipated future deposits, and preexisting relationships.

For example, a client with more than \$100,000 under the Firm's management will be charged a negotiable fee of 2% annually or less, applied to the total amount of the assets under the Firm's management.

<b>Assets Under Management</b>	<b>Annualized Asset-Based Fee Applied</b>
\$0 - \$100,000	2.00%
\$100,001 - above	2.0% or less

### *Fee Billing*

Fees are billed monthly in arrears, calculated using the average daily balance of Client's assets under management by the Firm for the prior calendar month. For example, every month, a client with a 2% annual fee will pay one-twelfth of 2% (.001666) of the average daily balance of the client's account for the previous month.

The client authorizes Integrity to debit its fee from the client's account in the advisory agreement. Where required, the Firm provides clients who authorize Integrity to directly debit fees from their account, a statement each time the Firm's fee is deducted from their account; setting forth the fee, the basis upon which the fee was calculated, and the time period covered by the fee.

Integrity will not be compensated on the basis of a share of capital gains or upon capital appreciation of the funds of the client. The asset management fee does not include custodial fees, transaction costs or other expenses charged by the client's custodian or broker-dealer. Each mutual fund in which the client's assets may be invested charges its own advisory fee and other expenses as described in the fund's prospectus.

When services are provided to other advisers for Integrity's biblically based investment screening and portfolio management services, the fee is 0.65% on the assets being advised upon.

Upon termination, any unearned fees collected in advance will be promptly returned to the client.

### *Other Fees and Expenses*

Integrity's fees do not include custodial fees or brokerage commissions or other transaction costs, if any, charged by client's custodian and broker. Mutual funds in which client's assets may be invested charge additional advisory fees and other fees and expenses, as described in the applicable fund's prospectus. For more information, please see Item 12 below, which discusses brokerage.

No one at the firm accepts compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

### *Comparable Services*

We believe that Integrity's fees are competitive and reasonable for the services provided; however, lower fees for comparable services may be available from other sources.

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

Integrity does not charge any performance-based fees or engage in side-by-side management.

## **Item 7 -Types of Clients and Minimum Requirements**

Integrity generally provides investment advice to individuals, high net worth individuals, pension and profit-sharing plans, trusts, estates, charitable organizations, corporations, and other business entities.

Integrity has certain minimum thresholds that have been established to allow Integrity to provide the high level of personal services and attention which we believe our clients deserve. For Asset Management clients, Integrity's minimum account size is \$100,000, unless waived or reduced in Integrity's discretion.

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

### *Methods of Analysis*

Integrity's methods of security analysis are fundamental and technical analysis based upon sources of information from research materials, corporate rating services, financial newspapers and magazines, annual reports, prospectuses, filings with the SEC and company press releases.

Integrity believes successful investing depends on the type of investments, (such as stocks, bonds, etc.), when invested, and the duration of the investment. Holding an investment too long, or not long enough, can make the difference between a handsome gain and an ugly loss.

Analysis begins by analyzing the broad stock market to determine whether offense or defense is the proper disposition. Then asset class and sector indicators are used to determine which sectors and assets classes have favored status. Finally, possible investments are analyzed to determine which have the strongest technical attributes including positive momentum, relative strength, and positive trend. Once a security has been selected for inclusion into the portfolio, it is continuously monitored for changes in both the company's and the markets' technical strength.

Integrity believes the use of technical and fundamental analysis in the development and management of your portfolio gives you the benefit of the best of both worlds. Fundamental analysis is used to identify the strength of a possible investment. It tells us WHAT to buy. Technical analysis is used to identify buy and sell opportunities. It tells us WHEN to execute.

In all investment selection, Integrity will actively screen to minimize a portfolios exposure to investments that profit from or promote activities that are contrary to Christian values.

When using fundamental analysis, we generally rely on, among other things, company earnings, balance sheet variables and management quality which are used to determine the value of an investment. The data we review is generally considered reliable, but we cannot guarantee, nor have we verified its accuracy. In addition, the data that we review is sometimes subjective in nature and open to

interpretation. Even if our data and interpretation of the data is correct, there may be other factors that determine the value of securities other than those considered in fundamental analysis.

When using technical analysis, we review statistics to determine relative strength, momentum and trends in security prices and make our investment decisions based on the information compiled. This analysis does not try to predict how an investment will perform but helps us understand the current risk and possible reward of the investment. In addition, this analysis does not take into account, the more fundamental properties of what an investment may be worth such as company performance and balance sheet variables which may play a part in determining the value of an investment.

### *Principal Investment Strategies*

Integrity generally recommends the purchase of individual stocks, and it also recommends mutual funds to its clients. The securities portfolios of mutual funds are managed by the fund's investment advisor and not by Integrity. With respect to the purchase or sale of securities, Integrity relies upon dynamic asset allocation models to determine the appropriate portion of a client's assets to be invested in a certain asset class (i.e., equity or fixed income) at any given time.

### *Principal Investment Risks*

***Investing in securities involves risk of loss that clients should be prepared to bear.*** Risk refers to the possibility that you will lose money (both principal and any earnings) or fail to make money on an investment. Integrity cannot guarantee that it will achieve a client's investment objective. Below are some of the more specific risks of investments which Integrity may recommend to clients:

**Equity Risk.** Equity securities tend to be more volatile than other investment choices. The value of an individual company's securities can be more volatile than the market as a whole. This volatility affects the value of the client's overall portfolio. Small- and mid-cap companies are subject to additional risks. Smaller companies may experience greater volatility, higher failure rates, more limited markets, product lines, financial resources, and less management experience than larger companies. Smaller companies may also have a lower trading volume, which may disproportionately affect their market price, tending to make them fall more in response to selling pressure than is the case with larger companies.

**Investment Companies Risk.** When a client invests in open end mutual funds or ETFs, the client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the client will incur higher expenses, many of which may be duplicative. In addition, the client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives). ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value; (ii) the ETF may employ an investment strategy that utilizes high leverage ratios; or (iii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally.



## **Item 9 - Disciplinary Information**

Integrity has no material legal or disciplinary events to report.

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

No one at the firm is registered, or has an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

No one at the firm is registered, or has an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

Mark Minnella, Jason Kreke, Richard Wolfe, and Mark Loftus are licensed insurance producers and sell insurance products and services through Mark Minnella, Inc., a licensed business entity producer. Integrity and Mark Minnella, Inc. are under common control. From time to time, in this capacity they may offer clients of Integrity insurance products and/or services. In this capacity, they may receive compensation from the sale of an insurance product in addition to the advisory fee paid by the client to Integrity. Clients are always free to purchase insurance products through someone else.

Integrity has no material relationship or arrangement with any broker-dealers, municipal securities dealers, government securities brokers or dealers, investment companies or other pooled investment vehicles, banking or thrift institutions, accountants or accounting firms, lawyers or law firms, pension consultants, real estate brokers or dealers, or sponsors or syndicators of limited partnerships.

Integrity does not recommend or select other advisors for its clients.

At times, Integrity may provide investment management services to the accounts of clients of G.A. Repple & Company (CRD# 17486) and other investment advisers for purposes of providing biblically based investing.

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

### *Code of Ethics*

The firm has adopted a Code of Ethics which is based on the principle that Integrity and its employees owe a fiduciary duty to clients. In complying with this duty, advisory personnel must avoid activities or interests that might interfere with making decisions in the best interests of clients. Each person subject to the Code of Ethics is required to report all violations of which such person becomes aware. Integrity will provide a copy of its Code of Ethics, free of charge, upon the written or oral request of any client or prospective client.

Neither the firm nor any related person recommends to clients, or buys or sells for client accounts, securities in which they have a material financial interest.

### *Personal Trading*

From time to time, Integrity's representatives may purchase securities for their personal accounts that they also recommend to clients. In such cases, Integrity's representatives will not affect transactions for their personal accounts which will be contrary to recommendations being made to clients. Further, Integrity's representatives will not compete with clients in connection with such transactions. Integrity has adopted an Insider Trading Policy that prohibits its representatives from trading on non-public information.

## **Item 12 - Brokerage Practices**

### *Recommending Brokerage Firms*

Integrity will assist Asset Management clients who have selected an asset management program in opening a custodial/brokerage account.

Integrity utilizes Equity Advisor Solutions / Equity Trust to serve as custodian of their clients' assets and to execute their securities transactions. Integrity recommends Equity Advisor Solutions based on its transaction fees, best execution capabilities and financial stability. While Integrity believes the commissions or rates established by Equity Advisor Solutions to be competitive, transactions may not always be executed at the lowest available rate.

If a client directs the use of a broker/dealer other than through Equity Advisor Solutions, client's independent broker-dealer will determine the commission rate or fee schedule to apply in connection with the brokerage transactions. Each client that directs the use of a broker/dealer other than Equity Advisor Solutions should understand that the client will lose (i) the possible advantage that Integrity's other clients derive from aggregation of orders for several clients as a single transaction for the purchase or sale of a security and (ii) the ability of Integrity to effectively negotiate reduced commission rates. Trades effected other than through Equity Advisor Solutions are normally effected after the trades of clients that have selected Equity Advisor Solutions, primarily due to delays in communicating the orders to the appropriate broker/dealers.

### *Best Execution*

As a fiduciary, with respect to transactions it implements on behalf of its advisory clients, the Adviser has an obligation to obtain best execution of under the circumstances of the particular transaction. The Adviser seeks to execute client transactions in such a manner that the client's total cost or proceeds in each transaction is the most favorable under the circumstances.

### *Soft Dollars*

Integrity may receive so-called "soft dollar arrangements" wherein Integrity directs client commissions to a broker-dealer that provides research and brokerage services to Integrity. The firm's custodian provides software reporting to the firm. The receipt of this benefit is not a material conflict of interest and falls within the safe harbor provision for soft dollars under the Advisers' Act.

### *Order Aggregation*

Integrity frequently follows the practice of bunching orders for various clients, which typically results in better execution of those orders. In certain cases, where the aggregate order is executed in a series of transactions at various prices on a given day, each participating client's proportionate share of such order reflects the average price paid or received with respect to the total order placed on that day. When Integrity does not bunch client orders, clients may pay higher commissions or other transaction costs or greater spreads or receive less favorable net prices on these transactions than would otherwise be the case. As a result, Integrity always makes the decision whether to bunch client orders based upon whether or not doing so is in the best interests of clients and would achieve best execution.

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

A client's account(s) is typically reviewed at least quarterly by Mark A. Minnella, Principal of Integrity, for conformity with the client's financial goals. Factors triggering a review on an other than periodic basis may include significant changes in a client's financial condition, changes in the fundamentals of the companies or entities issuing securities, price fluctuations and significant economic or industry developments.

Integrity provides written quarterly reports to clients that include the present values and the values for prior quarters of the client's assets under management, the rate of return for the quarter, and current positions for all transactions. Clients also receive monthly statements from their broker-dealer/custodian detailing the transactions in the client's account.

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

#### *Incoming Referrals*

At present, Integrity does not have any relationships whereby they compensate a party for referring a client to them.

#### *Referrals of Other Professionals*

Integrity does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them. Integrity will refer clients to other service professionals if requested or deemed necessary, based on the specific needs of the client. It is possible that these professionals may, in turn, make referrals of their clients seeking investment advice to Integrity but compensation is never provided or received in exchange for a referral.

#### *Other Compensation*

Integrity's advisory representatives are also licensed agents of various insurance companies. A client of Integrity may purchase insurance products or services through an advisory representative of Integrity. In the event a client chooses to make such purchases, the advisory representative will receive an economic benefit in the form of a commission paid directly to them by the applicable insurance company. The receipt of this additional compensation by Integrity's advisory representative presents a conflict of interest when making a recommendation of an insurance product or service to a client of Integrity's. This

conflict is mitigated by the fact that any recommendation made to a client for any insurance product or service will always be made in the client's best interest and the selection of the individuals and entities through which an insurance product or service is purchased is solely within the discretion of the client.

## **Item 15 - Custody**

Integrity does not maintain physical custody of client assets. All clients' assets are held by an independent qualified custodian selected by the client. All checks deposited into client's custodial accounts must be made payable either to the custodian or for the benefit of the account name. Clients will receive account statements from their custodian at least quarterly. Clients should review their account statements carefully. Clients are encouraged to compare the account statements received from their qualified custodian with any reports received from Integrity.

Integrity may be deemed to have limited (i.e., constructive) custody of client assets since it has the authority to deduct its fees from the client's custodial account. Clients authorize Integrity to deduct advisory fees from their account in their client agreement. Each time a fee is deducted, Integrity will send the qualified custodian an invoice or statement of the fee to be deducted from the client's account. When required, Integrity also sends clients an invoice or statement itemizing the fee, including the formula used to calculate the fee, the value of the assets under management on which the fee is based and the time period covered by the fee.

Integrity is deemed to have "constructive" custody of assets because it uses Standing Letters of Authorizations ("SLOAs") for third-party money movement between a client's account on file with the client's respective custodians. Integrity relies upon the guidance set forth in the February 21, 2019 SEC No-Action Letter and maintains records to avoid the need for a surprise annual audit of these assets that would otherwise be required for advisers with custody.

## **Item 16 - Investment Discretion**

### *Discretionary Trading Authority*

Integrity provides investment advice on a discretionary basis to clients. The client and Integrity execute an investment advisory agreement wherein the client grants to Integrity discretionary authority to act on the client's behalf for the limited purpose of buying, selling, and trading securities and all actions necessary or incident to such activities. Clients may impose reasonable restrictions or limitations on Integrity's investment discretion. Clients are contacted at least annually to determine whether there are any changes to their financial circumstances or restrictions they wish to impose.

### *Limited Power of Attorney*

Clients typically grant Integrity a limited power of attorney over their brokerage account for trading purposes to determine the amount and number of securities to be bought and sold, to negotiate transaction costs on their behalf where possible and to periodically rebalance the client's account to the recommended allocation.

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

Integrity's policy is to not exercise proxy voting authority over client securities. Each client retains sole and absolute authority and responsibility to vote proxies at client's own expense with respect to investments owned by the client. Clients will receive their proxies or other solicitations directly from their custodian. Clients are free to contact Integrity via telephone or email about a particular solicitation and our office may provide them with assistance.

## **Item 18 - Financial Information**

Integrity does not require or solicit prepayment of more than \$500 in fees per client, six months or more in advance.

Integrity is capitalized in compliance with applicable regulations and is not aware of any financial condition that is reasonably likely to impair the fulfillment of our contractual commitments to our clients.

Integrity has not been the subject of a bankruptcy petition at any time during the past ten years.

## **Item 19 - Requirements for State Registered Advisers**

The firm's principal executive officers and management persons, and their formal education and business backgrounds are found in the attached ADV Part 2Bs.

Any business in which the firm is actively engaged is described in Item 10 above, and any other business in which any of the associated persons of the firm are engaged is described in the attached ADV Part 2Bs.

Neither the firm nor any of its supervised persons are compensated with performance-based fees.

This Item is not applicable as Integrity nor its associated persons have any such event to disclose as to having ever been found liable or required to pay any award for an arbitration claim or other civil proceeding related to an investment related activity of \$2,500, *involving* any of the following:

- (a) an investment or an *investment-related* business or activity
- (b) fraud, false statement(s), or omissions
- (c) theft, embezzlement, or other wrongful taking of property
- (d) bribery, forgery, counterfeiting, or extortion; or
- (e) dishonest, unfair, or unethical practices.

An award or otherwise being *found* liable in a civil, *self-regulatory organization*, or administrative proceeding *involving* any of the following:

- (a) an investment or an *investment-related* business or activity
- (b) fraud, false statement(s), or omissions
- (c) theft, embezzlement, or other wrongful taking of property

- (d) bribery, forgery, counterfeiting, or extortion; or
- (e) dishonest, unfair, or unethical practices.

Neither the firm nor any of its management persons has any relationship or arrangement with any issuer of securities.

***Additional Information***

***California Disclosures***

The California Code of Regulations (10 CCR Section 260.235.2) imposes two notice requirements upon financial advisers: (a.) lower cost comparable services may be available from others, and (b.) the possibility exists for a conflict of interest between your interests and ours. You are under no obligation to purchase advice or services from us.

All material conflicts of interest under CCR Section 260.238 (k) have been disclosed regarding the adviser, its representatives or any of its employees, which could be reasonably expected to impair the rendering of unbiased and objective advice. Should you have any questions, please contact Mark Minnella at (314) 212-1404.

**Item 1 – Cover Page Part 2B of Form ADV: Brochure Supplement**

**Mark A. Minnella, CFS<sup>®</sup>, CFCA<sup>®</sup>, CKA<sup>®</sup>**  
**CRD# 2215742**  
**Integrity Investors, LLC**  
**4339 Butler Hill Road, Suite 200**  
**St. Louis, MO 63128**  
**(314) 212-1404**

**June 26, 2023**

This brochure supplement provides information about Mark A. Minnella that supplements Integrity's brochure. You should have received a copy of that brochure. Please contact Mark Minnella at (314) 212-1404 if you did not receive Integrity's brochure or if you have any questions about the contents of this supplement.

Additional information about Mark Minnella is available on the SEC's website at: [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Item 2 - Educational Background and Business Experience**

Mark A. Minnella - YOB: 1955

Mr. Minnella uses certifications that are required to be explained in further detail.

### CFS®, Certified Fund Specialist

The CFS® designation program at the Institute of Business and Finance is an intermediate-to-advanced course on mutual funds, ETFs, REIT's, closed-end funds, and similar investments.

#### Qualifications and Education Requirements:

- Candidates must have a bachelors' degree or 2,000 hours of financial services work experience:
- Candidates must complete self-study program
- Pass three exams, and
- Meet continuing education requirements

### CFCA®, Christian Financial Consultant and Advisor

The CFCA® designation is a professional designation available for Christian financial consultants. Developed by the National Association of Christian Financial Consultants for their members for incorporating biblical principles into the financial planning practice.

#### Qualifications:

- Membership in the National Association of Christian Financial Consultants, self-study and a thesis

### CKA®, Certified Kingdom Advisor

The CKA® designation is issued by Kingdom Advisors, Inc. to demonstrate their knowledge and expertise in applying Biblical principles of financial planning.

#### Qualifications and Education Requirements:

- Candidates must hold a valid certification demonstrating expertise in their given field
- Candidates must meet minimum experience threshold
- Pass a qualifying examination and commit to uphold the principles in their personal lives

### Education Background

1975-1976, St. Louis Community College at Meramec, St. Louis, MO

1977-1978, Kansas State University, Manhattan, KS

1986-1987, Missouri Baptist College, St. Louis, MO

### Business Background

Managing Member/CCO, Integrity Investors, L.L.C., November 2001 to Present



### **Item 3 - Disciplinary Information**

Mark Minnella has never been the subject of any kind of legal or disciplinary event material to a client's evaluation of his integrity.

### **Item 4 - Other Business Activities**

Mark A. Minnella, Managing Member and CCO of Integrity, is also a licensed insurance producer. To the extent that advisory clients purchase insurance products through Mr. Minnella, he may receive, through Mark Minnella, Inc., the usual and customary commissions paid with respect to those products.

Mark A. Minnella is President and Owner of Mark Minnella, Inc., a professional services firm, and licensed business entity producer for insurance. Integrity and Mark Minnella, Inc. are under common control. This presents a conflict in that should you engage Mark Minnella, Inc. for professional services or to purchase insurance, Mr. Minnella will receive compensation. To address this conflict, clients are not required to engage Mark Minnella, Inc. for professional services or to purchase insurance and are free to engage another entity for the same.

Mark A. Minnella is the Executive Director of More Than Money, Inc. (MTM). MTM is a nonprofit corporation formed as a faith-based organization dedicated to promoting financial stewardship in low-income communities using educational workshops and materials. He spends approximately 2-3 hours a month in this capacity.

Mark A. Minnella is also the president of the National Association of Christian Financial Consultants. In that capacity Mr. Minnella oversees board meetings and executive officers. When, and if, requested Mr. Minnella represents the organization in alignment with its mission and vision. The National Association of Christian Financial Consultants is a non-profit 501(c)6 organization, and Mr. Minnella's association does not represent a significant time commitment.

### **Item 5 - Additional Compensation**

Mark A. Minnella is a licensed insurance producer. To the extent that clients purchase insurance products through Mr. Minnella, he will receive the usual and customary commissions paid with respect to those products through Mark Minnella, Inc.

Mr. Minnella does not receive compensation from his other business activities with More Than Money.

### **Item 6 - Supervision**

Our investment advisory representatives and employees are required to adhere to our compliance policies and procedures in the performance of their daily activities and responsibilities to us and you. Our compliance policies and procedures include an overview of the various state statutes and regulations governing our operations and are designed to comply with applicable regulations and to facilitate the timeliness and quality of our compliance activities.

Mark Minnella is responsible for supervising all advisory activities. If you have any questions or concerns about your account, you are asked to contact Mark Minnella by calling 314-212-1404 or email to [mark@integrityinvestors.com](mailto:mark@integrityinvestors.com).

### **Item 7 - Requirements for State-Registered Advisers**

Mark A. Minnella has not been involved in any arbitration claims, self-regulatory organization, or administrative proceeding, or been the subject of any bankruptcy petition.

**Item 1 – Cover Page Part 2B of Form ADV: Brochure Supplement**

**Jason A. Kreke  
CRD# 6149663  
Integrity Investors, LLC  
4339 Butler Hill Road, Suite 200  
St. Louis, MO 63128  
(314) 212-1404**

**June 26, 2023**

This brochure supplement provides information about Jason A. Kreke that supplements Integrity's brochure. You should have received a copy of that brochure. Please contact Mark Minnella at (314) 212-1404 if you did not receive Integrity's brochure or if you have any questions about the contents of this supplement.

Additional information about Jason Kreke is available on the SEC's website at: [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Item 2 - Educational Background and Business Experience**

Jason A. Kreke - YOB: 1978

### Education Background

Southern University Illinois, Edwardsville, IL, 08/2003 – 05/2004

### Business Background

Investment Adviser Representative, Integrity Investors, LLC, March 2019 to Present

Insurance Producer, Mark Minnella, Inc., October 2019 to Present

Registered Representative, LPL Financial, LLC, February 2018 – March 2019

Financial Advisor Trainee, Edward Jones, January 2013 – January 2018

## **Item 3 - Disciplinary Information**

Jason Kreke has never been the subject of any kind of legal or disciplinary event.

## **Item 4 - Other Business Activities**

Jason Kreke is also an insurance producer. To the extent that advisory clients purchase insurance products through Mr. Kreke, he may receive through Mark Minnella, Inc. the usual and customary commissions paid with respect to those products. Integrity and Mark Minnella, Inc. are under common control. This presents a conflict should you engage Mark Minnella, Inc. to purchase insurance products from. To address this conflict, clients are not required to engage Mark Minnella, Inc. to purchase insurance and are free to engage another entity for the same.

## **Item 5 - Additional Compensation**

Jason Kreke does not receive any additional economic benefits or compensation for providing advisory services.

## **Item 6 - Supervision**

Our investment advisory representatives and employees are required to adhere to our compliance policies and procedures in the performance of their daily activities and responsibilities to us and you. Our compliance policies and procedures include an overview of the various state statutes and regulations governing our operations and are designed to comply with applicable regulations and to facilitate the timeliness and quality of our compliance activities.

Mark Minnella is responsible for supervising all advisory activities of Mr. Kreke. If you have any questions or concerns about your account, you are asked to contact Mark Minnella by calling 314-212-1404 or email to [mark@integrityinvestors.com](mailto:mark@integrityinvestors.com).

## **Item 7 - Requirements for State-Registered Advisers**

Mr. Kreke has not been involved in any arbitration claims, self-regulatory organization, or administrative proceeding.

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**Richard L. Wolfe**  
**CRD# 4633741**  
**Integrity Investors, LLC**  
**4339 Butler Hill Road, Suite 200**  
**St. Louis, MO 63128**  
**(314) 212-1404**

**June 26, 2023**

This brochure supplement provides information about Richard L. Wolfe that supplements Integrity's brochure. You should have received a copy of that brochure. Please contact Mark Minnella at (314) 212-1404 if you did not receive Integrity's brochure or if you have any questions about the contents of this supplement.

Additional information about Richard Wolfe is available on the SEC's website at: [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Item 2 - Educational Background and Business Experience**

Richard L. Wolfe - YOB: 1957

### Education Background

East Central College, Union, MO 1974 - 1977

### Business Background

Investment Adviser Representative, Integrity Investors, LLC	9/2020 to Present
Insurance Producer, Mark Minnella, Inc.	9/2020 to Present
Agent, Dillard & Associates d/b/a Midwest Medicare	8/2014 to Present
Owner, Wolfe Financial Solutions, LLC	7/2018 to Present
Agent, CFD Investments, Inc.	1/2016 to 8/2020
Investment Adviser Representative, Creative Financial Designs, Inc.	1/2016 to 8/2020
Partner, Agent, Pathfinder Financial Advocates	7/2014 to 7/2018

## **Item 3 - Disciplinary Information**

Richard L. Wolfe does not have any legal or disciplinary events that are material or disclosable with respect to this item.

## **Item 4 - Other Business Activities**

Richard Wolfe is a licensed insurance producer. To the extent that advisory clients purchase life and annuity insurance products through Mr. Wolfe for Mark Minnella, Inc., Mr. Wolfe will receive the usual and customary commissions paid with respect to those products. Integrity and Mark Minnella, Inc. are under common control. This presents a conflict should you engage Mark Minnella, Inc. to purchase insurance products from. To address this conflict, clients are not required to engage Mark Minnella, Inc. to purchase insurance and are free to engage another entity for the same.

Mr. Wolfe also receives commissions directly for his sales of life, property and casualty, and accident and health insurance business through various insurance companies.

Wolfe Financial Solutions is not in operation and Mr. Wolfe does not receive any additional compensation from this entity.

## **Item 5 - Additional Compensation**

Richard Wolfe does not receive any additional economic benefits or compensation for providing advisory services.

## **Item 6 - Supervision**

Our investment advisory representatives and employees are required to adhere to our compliance policies and procedures in the performance of their daily activities and responsibilities to us and you. Our compliance policies and procedures include an overview of the various state statutes and regulations governing our operations and are designed to comply with applicable regulations and to facilitate the timeliness and quality of our compliance activities.

Mark Minnella is responsible for supervising all advisory activities of Mr. Wolfe. If you have any questions or concerns about your account, you are asked to contact Mark Minnella by calling 314-212-1404 or email to [mark@integrityinvestors.com](mailto:mark@integrityinvestors.com).

## **Item 7 - Requirements for State-Registered Advisers**

Mr. Wolfe has not been involved in any arbitration claims, self-regulatory organization, or administrative proceeding or bankruptcies.



**Item 1 – Cover Page Part 2B of Form ADV: Brochure Supplement**

**Mark G. Loftus**  
**CRD# 6507229**  
**Integrity Investors, LLC**  
**4339 Butler Hill Road, Suite 200**  
**St. Louis, MO 63128**  
**(314) 212-1404**

**June 26, 2023**

This brochure supplement provides information about Mark G. Loftus that supplements Integrity's brochure. You should have received a copy of that brochure. Please contact Mark Minnella at (314) 212-1404 if you did not receive Integrity's brochure or if you have any questions about the contents of this supplement.

Additional information about Mark Loftus is available on the SEC's website at: [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Item 2 - Educational Background and Business Experience**

Mark G. Loftus - YOB: 1957

### Education Background

Sacramento State University – Masters August 2005-August 2007

Fresno State University - K-12 teaching August 2003-August 2005

University of Missouri – BSBA Marketing August 1975-December 1979

### Business Background

Investment Adviser Representative, Integrity Investors, LLC, February 2023 to Present

Insurance Producer, Mark Minnella, Inc., February 2023 to Present

Creative Financial Designs, Inc., Investment Adviser Representative, November 2021 – August 2022

HBW Advisory Services, LLC, Investment Adviser Representative, June 2015 – November 2021

## **Item 3 - Disciplinary Information**

Mark G. Loftus resigned his position at a prior firm following an allegation that he violated firm procedures. Mr. Loftus has not been subject to any reportable criminal or civil actions, administrative proceedings before regulatory agencies, self-regulatory organization proceedings, or any other hearing or formal adjudication related to his professional licenses or certifications.

## **Item 4 - Other Business Activities**

Mark Loftus is a licensed insurance producer. To the extent that advisory clients purchase life and annuity insurance products through Mr. Loftus for Mark Minnella, Inc., Mr. Loftus will receive the usual and customary commissions paid with respect to those products. Integrity and Mark Minnella, Inc. are under common control. This presents a conflict should you engage Mark Minnella, Inc. to purchase insurance products from. To address this conflict, clients are not required to engage Mark Minnella, Inc. to purchase insurance and are free to engage another entity for the same.

Mr. Loftus also receives commissions directly for his sales of insurance business through various insurance companies.

Mr. Loftus is a full-time teacher and is compensated for this activity. This activity does not create a conflict of interest to Integrity or its clients.

## **Item 5 - Additional Compensation**

Mark Loftus does not receive any additional economic benefits or compensation for providing advisory services other than what is described in Item 4 above.

## **Item 6 - Supervision**

Our investment advisory representatives and employees are required to adhere to our compliance policies and procedures in the performance of their daily activities and responsibilities to us and you. Our compliance policies and procedures include an overview of the various state statutes and regulations governing our operations and are designed to comply with applicable regulations and to facilitate the timeliness and quality of our compliance activities.

Mark Minnella is responsible for supervising all advisory activities of Mr. Loftus. If you have any questions or concerns about your account, you are asked to contact Mark Minnella by calling 314-212-1404 or email to [mark@integrityinvestors.com](mailto:mark@integrityinvestors.com).

## **Item 7 - Requirements for State-Registered Advisers**

Mr. Loftus has not been involved in any arbitration claims, self-regulatory organization, or administrative proceeding or bankruptcies.