



Main Office & Mailing Address

Fifr, Inc.
CRD# 328620
Financial Freedom Simplified
1504A Boscobel St.
Nashville, TN 37206

Telephone: (818) 605-4900

fifr.io / thefiapp.com

Form ADV Part 2
Firm Brochure
December 17, 2024

This brochure provides information about the qualifications and business practices of Fifr, Inc. If you have any questions about the contents of this brochure, please contact us at (818) 605-4900 and/or support@fifr.io. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Fifr is also available on the SEC's website at www.adviserinfo.sec.gov.

While the firm is an investment adviser registered with various jurisdictions as may be required, registration does not imply a certain level of skill or training on the part of the firm or its associated personnel.

Item 2 Material Changes

Fifr, Inc. has the following material changes to report. Material changes relate to Fifr, Inc.'s policies, practices, or conflicts of interest.

- Changes to language in Item 4A to disclose when Fifr became a registered adviser
- Changes to language in Item 4B&C adding a statement of fiduciary duty, an adjustment regarding Fifr's liability with respect to independent acts taken by third parties
- Changes to Item 5A Advisory Fees. Fees changed from \$83 per month to \$99 per month for individuals, and \$139 per month for families and fees for "Other Consulting Services" changed from \$175 per hour to \$300 per hour.
- Changes to Item 5B Billing Method
- Changes to language in Item 13 Review of Accounts
- Changes to language in Item 14 regarding compensation for client referrals
- Changes to language in Item 16 regarding discretionary and non-discretionary management
- Changes to language in Item 19 to add dates of employment
- Changes to Forms ADV Part 2B for Daniel Alfi, Brendan McNamara, and Spencer Capalby regarding outside business activities
- Addition of Form ADV Part 2B for Thomas Walter

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Important Information

Throughout this document, Fifr, Inc. may also be referred to as “Fifr,” “the Firm,” “Firm,” “our,” “we” or “us.” The client or prospective client may be also referred to as “you,” “your,” “the member,” “the family”, “families” etc., and refers to a client engagement involving a single person as well as two or more persons; whether a natural person or legal entity.

Item 4 Advisory Business

A. Description of Firm

Fifr, Inc. is a Delaware Corporation formed on May 5, 2023 and became a registered investment adviser in 2023 with various states. Fifr is based in Nashville, Tennessee. Fifr is 100% owned by Daniel Alfi and Brendan McNamara.

B. Types of Advisory Services

Fifr has a fiduciary duty of loyalty and care to the Client. Accordingly, Fifr must act solely in the best interests of the Client at all times without regard to Fifr’s own interests and will avoid statements that are untrue or misleading, will disclose conflicts of interest that may exist now or in the future, and will receive no more than reasonable compensation for services. In cases, where the interests of Fifr conflict with those of the Client, Fifr will ensure that the Client’s interests prevail.

Fifr provides membership to its Financial Wellness Services platform that includes software and services owned and operated by Fifr and that are designed to help individuals and families achieve financial wellness. For this membership, Fifr collects a monthly membership fee. In addition to the Financial Wellness Services, Fifr offers Investment Management services to its members for no additional cost. In order to receive Investment Management Services, a client must have an active Financial Wellness Services membership.

1. Financial Wellness Services

Fifr provides comprehensive financial wellness services and software designed to help you achieve your financial goals including the development of a personalized financial plan, assistance with your execution of the plan, counsel on plan changes and tracking your plan progress. The Client financial plan may include but is not limited to ongoing assistance in establishing short, medium and long-term financial goals like planning for retirement, saving for education expenses, purchasing a home and others; analysis of assets and liabilities to produce a client net worth statement and updating this statement regularly; analysis of income and expenses to develop a personal budget; preparation of cash flow analyses and estimates; creation of debt payoff and borrowing strategies; identification of strategies to optimize or reduce tax obligation from investment accounts; advisory on charitable giving; general education but not recommendation of investment strategies and other financial matters as may arise from time to time. After the plan is created, the Advisor and its technology platform will assist the Client in executing tactical steps of the plan including recommendations on allocating funds to various savings, checking and investment accounts; preparing for large purposes, and executing conversions or distributions of assets in tax efficient ways. In creation of this plan, the Advisor may need to collect certain Client information of a financial nature including but not limited to balance sheets, income statements, assets and liabilities, information about Client lifestyle, client risk tolerance and others.

The client is under no obligation to act upon the investment adviser's recommendation, and, if the client elects to act on any of the recommendations, the client is under no obligation to effect the transaction through the investment adviser. This statement is required by California Code of Regulations, 10 CCR Section 260.235.2.

2. Investment Management Services

For clients with an active Financial Wellness Services membership, the Advisor may manage certain of the Client's assets (the "Portfolio") in accordance with the Client's financial plan, the Client's personal investment objectives and the Advisor's fiduciary duty to the Client. The Advisor may make both discretionary and non-discretionary investment recommendations that are suitable for the Client based on the information the Client provides including the Client's financial plan, goals, time horizon, and risk tolerance. Investment Management Services are not offered à la carte and the Client must be actively enrolled in Financial Wellness Services to receive Investment Management Services. The Advisor uses Altruist Financial, LLC ("Altruist") for broker-dealer and custodian services and conducts all discretionary investment management activity in accounts held at Altruist, ("Managed Accounts"). Advisor may also provide non-discretionary investment recommendations for Portfolio Assets Held Away from Altruist. Clients are permitted to impose reasonable limitations on Fifr's discretionary authority, including restrictions on investing in certain securities or types of securities. All such limitations, restrictions, and investment guidelines must be communicated to Fifr in writing.

By transferring assets into a managed account at Altruist, Client grants Advisor discretionary authority to manage those assets in accordance with Item 16 below.

3. Other Consulting Services

Other Consulting Services include financial advice and/or analysis of a specific client objective or situation that falls outside the scope of Financial Wellness Services and Investment Management Services. These specific client objectives are defined and agreed on by the client and the Firm in advance according to a separate advisory agreement. Potential situations that may fall out of scope of Financial Wellness Services or Investment Management Services may be the evaluation of a specific venture or investment the client wants to consider, or it may be the evaluation of an advisory service offered by another professional organization.

D. Wrap-Fee Programs

Fifr does not provide portfolio management services to any wrap fee programs, as that term is defined in the instructions to Form ADV Part 2.

E. Client Assets

As of 12/31/2023, Fifr had \$18,354,215 in assets under management ("AUM") on a discretionary basis and \$0 in AUM on a non-discretionary basis.

Item 5 Fees and Compensation

A. Advisory Fees

Prior to engaging Fifr to provide advisory services, the client will be required to enter into a written agreement with the Firm setting forth the terms and conditions and the fees under which it will render its services. Fees may be subject to negotiation under certain circumstances as agreed on by the Firm and the client. The following schedule of fees outlines the typical fee structure under which Fifr renders its services. The actual schedule of fees, as it applies to a particular client, will be clearly outlined in the Client Agreement.

Service Provided	Fees
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Financial Wellness Services	Up to \$99 per month for individuals Up to \$139 per month for families
Investment Management Services	\$0 per month
Other Consulting Services	\$300 Hourly

Investment advisers registering in California are required to note the following: Lower fees for comparable services may be available from other sources.

Financial Wellness Services are offered for a fixed flat fee according to Item 5A. Investment Management Services are available only to Clients of the Financial Wellness Services and are offered at no additional cost. Fees are not based on the value of assets, the quantity of assets, the capital gains or appreciation of Client assets in managed accounts. The Advisor retains the right in its sole discretion to reduce or waive entirely its fees for services. Fees for Financial Wellness Services are up to \$99 per month unless otherwise negotiated. Under no circumstances will the firm earn fees in excess of \$500 or six months or more in advance of services rendered.

Financial Wellness Services fees are billed monthly in advance and prorated based on the number of days that the Agreement is effective during the month. The Firm can reduce or waive entirely its Financial Wellness Services fees, in the Firm's sole discretion.

Fifr does not provide Investment Management Services without Financial Wellness Services; however, clients may engage Fifr for Other Consulting Services on an hourly basis at \$175 per hour unless otherwise negotiated. The hourly rate includes meeting time and preparation time.

B. Billing Method

Fees are usually deducted from a designated client account or accounts to facilitate billing on a monthly basis. The client must consent in advance to direct debiting of their investment account. By signing our Agreement, as well as the selected custodian account opening documents, the client will be authorizing the withdrawal of both advisory and transactional fees from their account. The withdrawal of these fees from each account will be accomplished by the selected custodian at the request of our firm, and the custodian will remit fees directly to Fifr. All fees deducted will be clearly noted on account statements that the client will receive directly from the custodian of record on a quarterly or more frequent basis. Each time we charge a fee, the client is sent a written invoice, including the fee, the formula used to calculate the fee, the fee calculation itself, and the time period covered by the fee. The name of the custodian will be included on the fee invoice. These will be sent to the client concurrent with the request for payment of our fees. We urge the client to compare this information with the fees listed in the account statement.

C. Other Fees and Expenses

Clients should be aware that they will be responsible for all fees imposed by the custodian for trading and other related costs, which can include but not be limited to brokerage commissions, transaction costs, custodian fees, transfer fees, redemption fees on short-term investments, cashiering fees and/or taxes or penalties levied by governmental authorities.

In addition, Fifr invests in open-end mutual funds and exchange traded funds in client portfolios. These funds charge fees to their shareholders, which are described in their respective prospectus and usually include a management fee, administrative and operations fees, and certain distribution fees. These fees are generally referred to as a fund's "expense ratio" and the fees are deducted at the mutual fund level when calculating the fund's net asset value ("NAV") and have a direct bearing on the fund's performance.

Other fees a client can incur include, but are not limited to, custodian fees, brokerage commissions, transaction fees, cashiering fees and/or taxes/penalties levied by governmental authorities. Fifr does not receive any portion of these fees or expenses and seeks to negotiate and minimize these fees wherever possible. When managing clients' assets, we take into consideration the overall costs to a client, and we strive to make transaction decisions that are the most economical for a client based on the prevailing facts and circumstances at that time.

All fees paid to Fifr for its services are separate and distinct from the fees and expenses outlined above. Importantly, all the fees charged to a client's account lowers the overall performance of the account. Therefore, clients should review all applicable direct and indirect fees charged, including but not limited to

custodian fees, transaction fees, fees associated with investments (e.g., mutual funds and ETFs), and advisory fees to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

Additional information about our fees in relationship to our brokerage practices are noted in Items 12 and 14 of this document.

D. Termination of Services

Financial Wellness Services fees are billed monthly in advance and prorated based on the number of days that the Agreement is effective during the month. In the event of termination of the Agreement, the Client shall receive a refund of fees prorated based on the number of days the Agreement was in effect prior to the termination and inclusive of the date of termination. Either the client or Fifr may terminate the Firm's services without penalty at any time. The Firm determines the amount to be refunded to the client, if any, by subtracting its fees earned as of the time of termination from any amounts collected in advance as of the time of termination.

E. No Compensation for Sale of Securities

Fifr does not accept compensation for the sale of securities or other investment products.

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

Fifr does not charge performance-based fees (i.e., fees calculated based on a share of capital gains upon or capital appreciation of the funds or any portion of the funds of an advisory client). Consequently, Fifr does not engage in side-by-side management of accounts that are charged a performance-based fee with accounts that are charged another type of fee (such as fees based on the client's assets under management).

Item 7 Types of Clients

Fifr provides advisory services primarily to individuals, especially those with long-term investment horizons. There is no minimum account size for Fifr's services. The firm also reserves the right to decline services to any prospective client for any nondiscriminatory reason.

Item 8 Methods of Analysis, Investment Strategies and Risk of Loss

A. Methods of Analysis

In formulating investment advice and managing assets, Fifr does not attempt to change its investment strategy based on macroeconomic factors. The Firm primarily focuses on helping clients to achieve market returns in low-cost index portfolios using the most tax-efficient way available to each particular client. This strategy is primarily adjusted to fit each client's individual liquidity requirements or to adjust for idiosyncratic exposure that a client has to a particular company and/or industry sector. Clients should be aware that investing in securities involves risk of loss that they should be prepared to bear.

B. Investment Strategies

As mentioned above, Fifr primarily employs a long-term, buy-and-hold investment strategy primarily using low-cost index funds that track all or a selected portion of the U.S. equity market. Fifr does not engage in market timing or stock pricing. Existing positions within a client account will be evaluated and may be recommended to remain when deemed appropriate.

C. Risk of Loss

Investing in securities involves a significant risk of loss, and all investments have certain risks that are borne by the investor. Fifr's methods of analysis and investment strategies aim to keep the risk of loss in mind. Since Fifr primarily engages in a long-term, buy-and-hold investment strategy using low-cost market ETFs, mutual funds, equities, bonds and treasuries clients will typically experience risk associated with the broader U.S. equity and fixed income markets.

Some of risks of loss a client should be aware of include, but are not limited, to the following:

1. Market Risk: The price of a security may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances.
2. Interest-Rate Risk: Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, the market values of stocks and bonds tend to decline. Changes in the Federal Reserve's monetary policy often influence market performance.
3. Sector Concentration Risk: Certain sectors might have a larger representation in client portfolios, especially due to market capitalization weighting within index funds. If a dominant sector underperforms, it can have a disproportionate impact on the fund's performance.
4. Inflation Risk: When any type of inflation is present, a dollar today will not buy as much as a dollar next year because purchasing power erodes at the rate of inflation.
5. Currency Risk: Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
6. Political and Legislative Risks: Companies face a complex set of laws and circumstances in each country in which they operate. The political and legal environment can change rapidly and without warning, with significant impact, especially for companies operating outside of the United States.
7. Financial Risk: Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.
8. Systemic or Black Swan Events: Unexpected major disruptions, whether they be economic, political, environmental, or financial crises, can cause significant market downturns.
9. Fixed Income investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This includes corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best known type of fixed income security. In general the fixed income market is volatile, and fixed income securities carry significant interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting, but these bonds still carry a risk of losing share price value. Risks of investing in foreign fixed income securities also include the general risks inherent in non-U.S. investing.
10. Equity investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry market conditions and general economic environments.
11. The mutual funds and ETFs recommended by Fifr are designed to track specific indices or markets as a whole but they may not perfectly replicate the performance of the index. This can be due to fees, imperfect replication, or other factors leading to a tracking error that can impact returns.

Item 9 Disciplinary Information

Neither the firm nor its management has been involved in a material criminal or civil action in a domestic, foreign or military jurisdiction, an administrative enforcement action, or self-regulatory organization proceeding that would reflect poorly upon our offering advisory business or its integrity.

For Massachusetts Residents:

Disciplinary history of Fifr, Inc. and its representatives may be obtained by contacting the Massachusetts Securities Division at (617) 727-3548. No disciplinary history exists for Fifr and/or its owners or employees.

Item 10 Other Financial Industry Activities and Affiliations

Neither Fifr, nor any member of its management is registered as a securities broker-dealer, or a futures commission merchant, commodity pool operator or commodity trading advisor.

The Firm does not have any affiliation with any related person who is a broker-dealer, investment company, other investment advisor, financial planning firm, commodity pool operator, commodity trading adviser or futures commission merchant, banking or thrift institution, accounting firm, law firm, insurance company or agency, pension consultant, real estate broker or dealer, or an entity that creates or packages limited partnerships.

All material conflicts of interest under California Code of Regulations Section 260.238(k) are disclosed regarding the investment adviser, its representatives or any of its employees, which could be reasonably expected to impair the rendering of unbiased and objective advice.

Fifr does not receive compensation directly or indirectly from other advisers that creates a material conflict of interest, nor does it have other business relationships with advisers that would create a material conflict of interest.

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

A. Code of Ethics

The firm has adopted a Code of Ethics that sets forth the policies of ethical conduct for all personnel and accepts the obligation not only to comply with the mandates and requirements of all applicable laws and regulation but also to take responsibility to act in an ethical manner in all professional services and activities. The firm periodically reviews and amends its Code of Ethics and written procedures to ensure currency, and all firm access persons are required no less than annually to attest to their understanding and adherence. Our Code of Ethics is also available free upon request to any client or prospective client.

B&C&D. Participation or Interest in Client Transactions and Personal Trading

It is Fifr's policy not to enter into any principal transactions or agency cross transactions on behalf of client accounts. Principal transactions occur where an adviser, acting as principal for its own account, buys securities from or sells securities to an advisory client. Agency cross transactions occur where a person acts as an investment adviser in relation to a transaction in which the adviser, or an affiliate of the adviser, acts as broker for both the advisory client and for another person on the other side of the transaction.

Neither Fifr nor any of its employees act as general partner in a partnership in which clients are solicited to invest or as an investment adviser to a mutual fund or other investment company that is recommended to clients.

Based upon a client's stated objectives, Fifr may, under certain circumstances, recommend the purchase or sale of securities in which the Firm or its affiliates have positions. Such recommendations will only be made to the extent that they are reasonably believed to be in the best interests of the client. Additionally, as part of Fifr's fiduciary duty to clients, the Firm and its associated persons will endeavor at all times to put the interests of the clients first, and at all times are required to adhere to the Firm's Code of Ethics. Fifr's recommendations to clients may differ from client to client, based on each client's unique

circumstances. The Firm may also recommend purchase of a security for one client while recommending the sale of that security for another. However, as a fiduciary Fifr aims to act for the benefit of clients and place clients' interests before its own.

The volume of client and employee trades are not at a magnitude that would materially affect the markets of the securities that are traded (e.g., highly liquid market ETFs and mutual funds).

Item 12 Brokerage Practices

A. Selection of Broker-Dealers for Client Transactions

When engaged to provide investment management services, our firm will suggest Altruist Financial LLC (CRD#299274), an unaffiliated SEC-registered broker dealer and FINRA/SIPC member, as the introducing broker to Apex Clearing Corporation, an unaffiliated SEC-registered broker dealer and FINRA/SIPC member. ("Altruist"). Fifr, Inc. is independently owned and operated and is not legally affiliated with Altruist. While we may recommend that a client use Altruist as their service provider, the client will decide whether to do so and will open their account with Altruist by entering into an account agreement directly with them. If a client does not wish to place their assets with Altruist, then our firm may not be able to manage their account under its investment management services engagement.

Research and Other Soft Dollar Benefits

Altruist offers to independent investment advisers services which include custody of securities, trade execution, clearance, and settlement of transactions. Our firm may also receive benefits from Altruist and other firms such as including research, technological tools, consulting, publications, practice management conferences and other services. Fifr seeks to service all of our clients' accounts with any such benefits we receive.

As a fiduciary, we endeavor to act in our clients' best interests at all times. Our recommendation that clients maintain their assets in accounts at Altruist is based solely on the nature, cost or quality of custody and brokerage services provided by Altruist regardless of any other products or services which may be provided to the Firm. We are aware, however, that the availability of some of the foregoing products and services may create a potential conflict of interest in selecting or recommending Altruist or another brokerage service since Fifr does not have to produce or pay for those benefits.

We conduct periodic assessments of any service provider we recommend. This generally includes a review of their range of services, reasonableness of fees, among other items, in comparison to their industry peers.

Brokerage for Client Referrals

We do not receive referrals from our preferred broker-dealer or any third party; nor are client referrals a factor in our selection of a broker-dealer.

Directed Brokerage

The Firm does not require clients to execute transactions through a specified broker-dealer. However, we generally recommend that investment management accounts be maintained at Altruist. Clients should be aware that, in the event a client directs the brokerage to be used for transactions, the Firm may be limited in our ability to negotiate the best execution in some transactions. Clients may pay higher transaction costs as a result of a broker-directed account by a client.

B. Aggregation of Orders

The volume of client and employee trades are not of a magnitude such that aggregating orders into a block would materially affect the prices or transaction costs of the securities that are traded (e.g., highly

liquid market, low-cost ETFs and mutual funds). If client trade volumes were to reach such a threshold to make pricing more advantageous via aggregation Fifr may aggregate orders and be traded as a "block"..

Item 13 Review of Accounts

A. Review of Accounts and Reviewers

The Firm's managed accounts are reviewed on a monthly basis as part of a comprehensive financial review and update process for the client including with regard to the overall asset allocation of the portfolio.

In addition to the monthly review of accounts, accounts may be reviewed in response to specific review triggers. Reviews are conducted by Daniel Alfi or Thomas Walter.

B. Review Triggers

The Firm's managed accounts are reviewed with regard to the overall asset allocation of the portfolio and in light of the client's Investment Policy Statement. Triggers for investment reviews include:

- Deposits or withdrawals
- Changes in the client's situation or in the client's objectives
- Rebalances due to tax-loss harvesting strategies

C. Regular Reports

Clients will receive account statements sent directly from custodians or brokerage companies where their investments are held. Fifr, Inc. urges clients to carefully review these statements for accuracy and clarity, and to ask questions when something is not clear.

Fifr may provide quarterly reports to Financial Wellness Services clients. All firm performance reports (if they are provided) will be prepared in accordance with appropriate jurisdictional guidance. Clients are urged to carefully compare statements sent by the Firm with statements sent by other third parties, such as those sent by the client's custodian.

Item 14 Client Referrals and Other Compensation

A. Non-Client Economic Benefits

Fifr, Inc. receives economic benefit from its selected custodians in the form of the support products and services they make available to our firm and other independent investment advisers. These benefits may include the following products and services (provided either without cost or at a discount):

- receipt of duplicate client statements and confirmations
- research related products and tools
- access to trading desks serving our clients
- access to block trading services
- the ability to have advisory fees deducted directly from a client's accounts (per written agreement)
- resource information related to capital markets and various investments
- access to an electronic communications network for client order entry and account information
- access to mutual funds with no transaction fees and/or select investment managers
- discounts on marketing, research, technology, and practice management products or services provided to our firm by third-party providers

Altruist may also pay for business consulting and professional services received by our firm. Some of the products and services made available by Altruist through a program may benefit our firm but may not

benefit client accounts. These products or services may assist our firm in managing and administering client accounts, including accounts not maintained at either custodian. These other services made available by Altruist are intended to help Fifr, Inc. manage and further develop its business enterprise.

Some of the noted products and services made available by Altruist may benefit our advisory firm but may not directly benefit a client account, and certain research and other previously referenced services may qualify as "brokerage or research services" under Section 28(e) of the Securities Exchange Act of 1934. The availability of these services from Altruist benefits our firm because we do not have to produce or purchase them as long as our clients maintain assets in accounts at Altruist. There is an appearance of a conflict of interest since our firm may have an incentive to select or recommend Altruist as custodian based on our firm's interest in receiving these benefits rather than our client's best interest in receiving favorable trade execution. Note that as a fiduciary we endeavor at all times to put the interests of our clients first. It is also important to mention that the benefit received by our advisory firm does not depend on the amount of brokerage transactions directed to Altruist, and the selection of Altruist as custodian of record is in the best interests of our clients since the selection is primarily supported by the scope, quality, and cost of services provided as a whole – not just those services that benefit only our firm.

B. Client Referral Compensation

We do not engage in solicitation activities involving unregistered persons. Fifr does not directly or indirectly compensate any person who is not a supervised person for client referrals. All compensation paid to the firm is paid directly by the client.

Item 15 Custody

Client assets will be maintained by an unaffiliated, qualified custodian, such as a bank, broker/dealer (e.g., Altruist), mutual fund companies or transfer agent. Account assets are not held by our firm or any associate or our firm. In keeping with this policy involving our client funds and securities, we:

- Prohibit an associate from having authority to directly withdraw securities or cash assets from a client account. We may request the withdrawal of advisory fees from an account, we will only do so through the engagement of a qualified custodian maintaining client account assets, via the client's prior written approval, and following our delivery of our written notice;
- Do not accept or forward client securities (i.e., stock certificates) erroneously delivered to our firm;
- Will not collect advance fees of \$500 or more for services that are to be performed six months or more into the future; and
- Will not authorize an associate to have knowledge of a client's account access information (i.e., online 401(k), brokerage or bank accounts) if such access would allow physical control over account assets.

When it deducts fees directly from client accounts at a selected custodian, Fifr will be deemed to have custody of client's assets and must have written authorization from the client to do so. Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy.

Clients will be provided with investment account transaction confirmations and quarterly account statements sent directly to them by their custodian of record. Statements are provided on at least a quarterly basis or as transactions occur within their account. Our advisory firm will not create an account statement for a client nor serve as the sole recipient of an account statement.

Should a client receive periodic reports from Fifr that includes investment performance information, they are urged to carefully review and compare their account statements that they have received directly from their custodian of record with any performance report from our firm.

Item 16 Investment Discretion

Discretionary Authority; Limitations

When signing the advisory agreement the Client appoints Fifr as discretionary investment manager for any Portfolio assets held in a managed account. By granting the Advisor discretionary authority, the Client agrees that Fifr shall be agent and attorney-in-fact and is permitted to make investments decisions on Client's behalf, without first obtaining the Client's approval or authorization, including deciding which securities to buy, sell or hold for a Client's account; deciding the amount of securities to buy, sell or hold for a Client's account; the broker-dealer to be used for a purchase or sale of securities for a Client's account; and whether a Client's purchase or sale should be combined with those of other clients and traded as a "block". For the avoidance of doubt, discretionary authority is granted only for assets held in a managed account. The Client is under no obligation to transfer assets into a managed account and may at any time in their sole discretion withdraw discretionary authority by transferring assets out of a managed account. Clients are permitted to impose reasonable limitations on Fifr's discretionary authority, including restrictions on investing in certain securities or types of securities. All such limitations, restrictions, and investment guidelines must be communicated to Fifr in writing.

For assets in accounts held away from Altruist ("Assets Held Away") Fifr will not manage these on a discretionary basis, and the Advisor's services are limited to providing non-discretionary recommendations for Assets Held Away and the Advisor will not have access to or be able to conduct any trading on the Clients' behalf for Assets Held Away. The Client assumes all responsibility for the decision to accept or reject the Advisor's non-discretionary recommendations and for the timely implementation of recommendations for Assets Held Away. Securities recommendations are subject to market conditions and opportunities may be lost or materially affected by delays in implementation of a recommendation. The Advisor is not responsible for any loss or negative outcome due to a failure or delay by the Client to implement a non-discretionary recommendation.

Item 17 Voting Client Securities

Fifr's policy and practice is to not vote proxies on behalf of its clients and therefore, the Firm shall have no obligation to take any action or render any advice with respect to the voting of proxies solicited by or with respect to issuers of securities held in a client's account. Consequently, clients retain the responsibility for receiving and voting all proxies directly from their custodian for securities held within the client's account.

If you have any questions about the contents of this policy, please contact us at (818) 605-4900 and/or support@fifr.io.

Item 18 Financial Information

Fifr does not require or solicit prepayment of more than \$500 in fees per client, six months or more in advance and therefore is not required to provide, and has not provided, a balance sheet. Furthermore, Fifr does not have any financial commitments that may impair its ability to meet contractual and/or fiduciary obligations to clients. Finally, the Firm has not been the subject of a bankruptcy proceeding.

We will not take physical custody of your assets, nor do we have the type of discretionary authority to have such control over account assets. Fee withdrawals must be done through a qualified intermediary (e.g., account custodian of record), per the client's prior written agreement, and following the client's receipt of our firm's written notice.

Item 19 Requirements for State-Registered Advisers

A. Principal Executive Officers and Management Persons

CEO / Shareholder / Chief Financial Officer / Secretary / Treasurer

Daniel Alfi

Business Background and Education

Daniel is co-founder of Fifr, Inc., a financial services firm focused on helping people achieve financial freedom more affordably through technological innovation. Prior to Fifr, Daniel has worked as a technology investor and investment banker at Fractal Software (2021-2023), ICONIQ Capital (2017-2021) and Morgan Stanley (2015-2017).

Daniel graduated from the University of Pennsylvania M&T Program in 2014 with a Bachelor of Applied Sciences from Penn Engineering, specializing in Computer and Information Science, as well as a Bachelor of Science in Economics from Wharton, specializing in Finance.

Chief Technology Officer / Shareholder / Chief Information Security Officer

Brendan McNamara

Business Background and Education

Brendan is co-founder of Fifr, Inc. Prior to Fifr, Brendan was the Senior iOS engineer at Superhuman (Mar 2022 - May 2023), an email productivity startup. Before that, Brendan led iOS engineering teams at startups including Toric (Jun 2020 - Mar 2022) and Cue from (Apr 2019 - Mar 2020).

He started his career as a Software Engineer at both Oculus (Aug 2017 - Nov 2018) and Facebook (Jun 2015 - Nov 2018) after graduating from Vanderbilt University in 2015 with a Bachelor of Science degree in Mathematics and Computer Science.

B. Other Actively Engaged Businesses

Fifr and its members are not actively engaged in outside business activities.

C. Performance Based Fees

Fifr and its associates are not compensated for advisory services involving performance-based fees. In addition, our firm prohibits its associates from accepting or receiving additional economic benefit, such as sales awards or other prizes, for providing advisory services to our clients.

D. Disciplinary Information

Registered investment advisers are required to disclose certain material facts regarding any legal or disciplinary events that would be material to the evaluation of each officer or a supervised person providing investment advice. No reportable information is applicable to this section. No associate at Fifr has been the subject of any disciplinary action that would require such disclosure.

E. Arrangement with Issuers of Securities

No pre-existing reportable relationship or arrangement exists between any management person with any issuer of securities.

Form ADV Part 2B - Brochure Supplement

for

Daniel Alfi

**Chief Executive Officer / Shareholder / Chief Financial Officer / Secretary /
Treasurer**

Fifr, Inc.

**1504A Boscobel Street
Nashville, TN 37206
(818) 605-4900**

Effective: July 18, 2024

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of Daniel Alfi (CRD# 6354062) in addition to the information contained in the Fifr, Inc. ("Fifr" or the "Firm", CRD# 328620), Disclosure Brochure. You should have received a copy of that brochure. Please contact Mr. Alfi if you did not receive Fifr's brochure or if you have any questions about the contents of this supplement.

Additional information about Mr. Alfi is available on the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching his full name or his Individual CRD# 6354062.

Item 2 Educational Background and Business Experience

Supervised Person's Name: Daniel Alfi

Year of Birth: 1993

Daniel is a co-founder of Fifr, Inc., a financial services firm focused on helping people achieve financial freedom more affordably through technological innovation. Prior to Fifr, Daniel has worked as a technology investor and investment banker at Fractal Software (2021-2023), ICONIQ Capital (2017-2021) and Morgan Stanley (2015-2017).

Daniel graduated from the University of Pennsylvania M&T Program in 2014 with a Bachelor of Applied Sciences from Penn Engineering, specializing in Computer and Information Science, as well as a Bachelor of Science in Economics from Wharton, specializing in Finance.

Item 3 Disciplinary Information

Registered investment advisers are required to disclose certain material facts regarding any legal or disciplinary events that would be material to the evaluation of each officer or a supervised person providing investment advice. No reportable information is applicable to this section. Daniel Alfi has not been the subject of any disciplinary action that would require such disclosure.

Item 4 Other Business Activities

Daniel Alfi is not actively engaged in outside business activities.

Item 5 Additional Compensation

Daniel Alfi is not compensated for advisory services involving performance-based fees. In addition, our firm prohibits its associates from accepting or receiving additional economic benefit, such as sales awards or other prizes, for providing advisory services to our clients.

Item 6 Supervision

Daniel Alfi serves in multiple capacities with the firm such as Chief Executive Officer, Chief Financial Officer, Chief Investment Officer, and investment adviser representative. Daniel is supervised by Spencer Capalby, the Chief Compliance Officer. Questions relative to Fifr, its staff, its services, or this Form ADV Part 2 may be made to the attention of Spencer Capalby at (909) 373-7732.

Fifr has adopted a Code of Ethics, an internal compliance document reasonably designed to ensure that each Supervised Person is meeting their fiduciary duty to clients of Fifr. Further, Fifr is subject to regulatory oversight by various agencies. These agencies require registration by Fifr and its Supervised Persons. As a registered entity, Fifr is subject to examination by the regulators, which may be announced or unannounced. Fifr is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Item 7 Requirements for State-Registered Advisors

There have been neither arbitration awards nor any awards where our advisory firm or Daniel Alfi has been found liable in any civil, self-regulatory or administrative proceeding. Neither the firm nor Daniel Alfi has been the subject of a bankruptcy petition.

Form ADV Part 2B - Brochure Supplement

for

Brendan McNamara
Chief Technology Officer / Shareholder / Chief Information Security Officer

Fifr, Inc.
1504A Boscobel Street
Nashville, TN 37206
(818) 414-4182

Effective: July 18, 2024

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of Brendan McNamara (CRD# 7817408) in addition to the information contained in the Fifr, Inc. ("Fifr" or the "Firm", CRD# 328620), Disclosure Brochure. You should have received a copy of that brochure. Please contact Mr. McNamara if you did not receive Fifr's brochure or if you have any questions about the contents of this supplement.

Additional information about Mr. McNamara is available on the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching his full name or his Individual CRD# 7817408.

Item 2 Educational Background and Business Experience

Supervised Person's Name: Brendan McNamara

Year of Birth: 1993

Brendan is co-founder of Fifr, Inc. Prior to Fifr, Brendan was the Senior iOS engineer at Superhuman (Mar 2022 - May 2023), an email productivity startup. Before that, Brendan led iOS engineering teams at startups including Toric (Jun 2020 - Mar 2022) and Cue from (Apr 2019 - Mar 2020).

He started his career as a Software Engineer at both Oculus (Aug 2017 - Nov 2018) and Facebook (Jun 2015 - Nov 2018) after graduating from Vanderbilt University in 2015 with a Bachelor of Science degree in Mathematics and Computer Science.

Item 3 Disciplinary Information

Registered investment advisers are required to disclose certain material facts regarding any legal or disciplinary events that would be material to the evaluation of each officer or a supervised person providing investment advice. No reportable information is applicable to this section. Brendan McNamara has not been the subject of any disciplinary action that would require such disclosure.

Item 4 Other Business Activities

Brendan McNamara is not actively engaged in outside business activities.

Item 5 Additional Compensation

Brendan McNamara is not compensated for advisory services involving performance-based fees. In addition, our firm prohibits its associates from accepting or receiving additional economic benefit, such as sales awards or other prizes, for providing advisory services to our clients.

Item 6 Supervision

Brendan McNamara serves in multiple capacities with the firm such as Chief Technology Officer, Chief Information Security Officer and investment adviser representative. Brendan is supervised by Spencer Capalby, the Chief Compliance Officer. Questions relative to our firm, staff, its services, or this Form ADV Part 2 may be made to the attention of Spencer Capalby at (909) 373-7732.

Fifr has adopted a Code of Ethics, an internal compliance document reasonably designed to ensure that each Supervised Person is meeting their fiduciary duty to clients of Fifr. Further, Fifr is subject to regulatory oversight by various agencies. These agencies require registration by Fifr and its Supervised Persons. As a registered entity, Fifr is subject to examination by the regulators, which may be announced or unannounced. Fifr is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Item 7 Requirements for State-Registered Advisors

There have been neither arbitration awards nor any awards where our advisory firm or Brendan McNamara has been found liable in any civil, self-regulatory or administrative proceeding. Neither the firm nor Brendan McNamara has been the subject of a bankruptcy petition.

Form ADV Part 2B - Brochure Supplement

for

**Spencer Capalby
Head of Business and People / Chief Compliance Officer**

**Fifr, Inc.
1504A Boscobel Street
Nashville, TN 37206
(909) 373-7732**

Effective: July 18, 2024

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of Spencer Capalby (CRD# 6626031) in addition to the information contained in the Fifr, Inc. ("Fifr" or the "Firm", CRD# 328620), Disclosure Brochure. You should have received a copy of that brochure. Please contact Mr. Capalby if you did not receive Fifr's brochure or if you have any questions about the contents of this supplement.

Additional information about Mr. Capalby is available is available on the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching his full name or his Individual CRD# 6626031.

Item 2 Educational Background and Business Experience

Supervised Person's Name: Spencer Capalby

Year of Birth: 1991

Spencer is the Head of Business and People, Chief Compliance Officer and a registered investment adviser representative at Fifr, Inc., a financial services firm focused on helping people achieve financial freedom more affordably through technological innovation. Prior to Fifr, Spencer was not employed (Oct 2023 - Jul 2024). Before that Spencer was a Senior Associate at ICONIQ Capital, LLC (Nov 2015 - Sep 2023), a legal assistant at Winston & Strawn LLP (Mar 2015 - Oct 2015), a and Legal Assistant at Pillsbury Winthrop Shaw Pittman, LLP (Jul 2014 -I Mar 2015).

Spencer graduated from Columbia University with a Bachelor of Arts in 2013.

Item 3 Disciplinary Information

Registered investment advisers are required to disclose certain material facts regarding any legal or disciplinary events that would be material to the evaluation of each officer or a supervised person providing investment advice. No reportable information is applicable to this section. Spencer Capalby has not been the subject of any disciplinary action that would require such disclosure.

Item 4 Other Business Activities

Spencer Capalby is not actively engaged in outside business activities.

Item 5 Additional Compensation

Spencer Capalby is not compensated for advisory services involving performance-based fees. In addition, our firm prohibits its associates from accepting or receiving additional economic benefit, such as sales awards or other prizes, for providing advisory services to our clients.

Item 6 Supervision

Spencer Capalby serves in multiple capacities with the firm such as investment adviser representative, Fifr's Head of Business and People, Chief Compliance Officer, responsible for supervising Fifr's investment adviser representatives. Questions relative to Fifr, its staff, its services, or this Form ADV Part 2 may be made to the attention of Spencer Capalby at (909) 373-7732.

Supervising oneself poses a conflict of interest, and therefore Fifr has adopted a Code of Ethics, an internal compliance document reasonably designed to mitigate this conflict of interest and to ensure that each Supervised Person is meeting their fiduciary duty to clients of Fifr. Further, Fifr is subject to regulatory oversight by various agencies. These agencies require registration by Fifr and its Supervised Persons. As a registered entity, Fifr is subject to examination by the regulators, which may be announced or unannounced. Fifr is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Item 7 Requirements for State-Registered Advisors

There have been neither arbitration awards nor any awards where our advisory firm nor has Spencer Capalby been found liable in any civil, self-regulatory or administrative proceeding. Neither the firm nor Spencer Capalby has been the subject of a bankruptcy petition.

Form ADV Part 2B - Brochure Supplement

for

**Thomas Walter
Financial Wellness Expert**

**Fifr, Inc.
1504A Boscobel Street
Nashville, TN 37206
(909) 373-7732**

Effective: October 14,2024

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of Thomas Walter (CRD# 7677525) in addition to the information contained in the Fifr, Inc. ("Fifr" or the "Firm", CRD# 328620), Disclosure Brochure. You should have received a copy of that brochure. Please contact Mr. Capalby if you did not receive Fifr's brochure or if you have any questions about the contents of this supplement.

Additional information about Mr. Walter is available is available on the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching his full name or his Individual CRD# 6626031.

Item 2 Educational Background and Business Experience

Supervised Person's Name: Thomas Walter

Year of Birth: 1997

Thomas is a Financial Wellness Expert and a registered investment adviser representative at Fifr, Inc., a financial services firm focused on helping people achieve financial freedom more affordably through technological innovation. Prior to Fifr, Thomas was not employed (Sept 2024). Before that Thomas was an Analyst at ICONIQ Capital, LLC (July 2022 - August 2024).

Thomas graduated from Brigham Young University with a Bachelor of Finance in 2022.

Item 3 Disciplinary Information

Registered investment advisers are required to disclose certain material facts regarding any legal or disciplinary events that would be material to the evaluation of each officer or a supervised person providing investment advice. No reportable information is applicable to this section. Thomas Walter has not been the subject of any disciplinary action that would require such disclosure.

Item 4 Other Business Activities

Thomas Walter is not actively engaged in outside business activities that present a conflict of interest with advisory activities.

Item 5 Additional Compensation

Thomas Walter is not compensated for advisory services involving performance-based fees. In addition, our firm prohibits its associates from accepting or receiving additional economic benefit, such as sales awards or other prizes, for providing advisory services to our clients.

Item 6 Supervision

Thomas Walter serves as a Financial Wellness Expert and is supervised by Fifr's Compliance Office . Questions relative to Fifr, its staff, its services, or this Form ADV Part 2 may be made to the attention of Spencer Capalby at (909) 373-7732.

Item 7 Requirements for State-Registered Advisors

There have been neither arbitration awards nor any awards where our advisory firm nor has Spencer Capalby been found liable in any civil, self-regulatory or administrative proceeding. Neither the firm nor Spencer Capalby has been the subject of a bankruptcy petition.