



Indyfin LLC
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<https://www.indyfin-llc.com/>

Firm Brochure

This brochure provides information about the qualifications and business practices of Indyfin LLC. Please contact Indyfin LLC at (972) 878-9522 if you have any questions about the content of this brochure.

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or any state securities administrator. Additional information about Indyfin LLC is available on the SEC’s website at www.adviserinfo.sec.gov. Click on the “Investment Adviser Search” link and then search for “Investment Adviser Firm” using the firm’s IARD “CRD” number, which is 293453.

Indyfin LLC is a registered investment adviser, but registration does not imply a certain level of skill or training.

Item 2: Material Changes

In this Item, we are required to identify and discuss material changes since its last annual amendment. Since filing its last annual amendment on March 31, 2022, we have the following material changes to report:

- We have transitioned from registration with the state of Texas to registration with the SEC. Various corresponding updates have been made throughout this brochure.

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Item 4: Advisory Business

Description of Firm

Indyfin LLC (the “Firm,” “we” or “us”) is a Texas-domiciled, Delaware limited liability company formed in February of 2018. Akshay Singh maintains a majority interest in the Firm through its parent company, Indy Financial Technologies, Inc.

Promoter/Solicitor Services

The Firm offers advisory services exclusively through our interactive website platform (<https://www.indyfin-llc.com/>) that involves matching prospective advisory clients with unaffiliated investment advisory firms with whom the Firm has a written agreement. We collect a variety of information from individuals and provide referrals through a variety of sources including purchasing leads from third-party lead generation services or originating referrals from websites owned by us.

The Firm’s interactive website platform collects information related to each prospective advisory client’s investment objectives, age and life stage, geographic compatibility, professional background, current asset value, and income levels. More specifically, the interactive website platform collects and evaluates information such as the prospective advisory client’s specific needs related to, e.g., retirement preparation, investment management, tax mitigation, education funding advice, inheritance management, second opinion services, business ownership intricacies, estate planning evaluation, and income stream sources. In addition, the interactive website platform collects and evaluates the prospective advisory client’s age, household income, profession, zip code, and investable assets. All of the information described above is collectively referred to as the “Prospective Advisory Client Data Points”. The interactive website platform then evaluates such Prospective Advisory Client Data Points to recommend and match each prospective advisory client to one or more third-party advisers that the Firm believes are best suited to address the prospective advisory client’s specific needs, and therefore are believed to be in the prospective advisory client’s best interest.

After engaging our interactive website, the prospective client determines whether to enter into an advisory relationship with any third-party adviser presented to, or made available, to such prospective advisory client through our website. Incidental to the interactive website platform, we may also coordinate meetings between prospective advisory clients and third-party investment advisers in an administrative capacity.

As part of our vetting process, we determine whether advisers we work with are registered as an investment adviser. In addition, we review the regulatory record of the adviser, nature of financial advice offered by the adviser and whether such advice meets our standards, types of technology tools the adviser uses to serve clients, and overall industry experience of the advisers and their professional qualifications. If the Firm is not satisfied, the adviser is not qualified or approved to receive referrals from Indyfin LLC. We do not review the on-going performance of the third-party investment adviser, do not effect transactions for any client’s account, and do not directly manage any investments on behalf of clients. Individuals will receive a copy of the third-party adviser’s Form ADV Part 2 and should be aware that they can obtain investment advisory services directly from other advisers of the individual’s choice.

The third-party adviser, if engaged by a prospective advisory client, will determine and implement specific investment strategies for the referred individual. We are not tax or legal professionals and do not give legal or tax advice. Indyfin LLC does not provide resources outside of our website platform unless it is to verify an individual user or address a specific user question. Indyfin LLC does not meet with the individual users or third-party investment advisers at our offices.

We tailor our services to prospective advisory clients based on the Prospective Advisory Client Data Points and deliver specific recommendations with respect to the third-party advisers we believe to be appropriate for a prospective advisory client’s specific situation. Personalized tailoring of financial planning and investment advisory services are performed by the third-party investment adviser. To the extent a prospective advisory client desires to impose restrictions on investing in certain securities or types of securities, such restrictions may be implemented by the third-party adviser at its sole discretion.

We do not participate in any wrap fee programs.

Assets Under Management

As of December 31, 2022, we have no regulatory assets under management.

Item 5: Fees & Compensation

Referral Fees

If an individual referred to a third-party investment adviser by Indyfin LLC enters into an advisory relationship with the other investment adviser, that adviser will pay Indyfin LLC a share of the fee it charges to that client. The referral fee will be a portion of the advisory fee earned by the third-party investment adviser as a result of the referral and the terms of that fee will be memorialized in an agreement between Indyfin LLC and the third-party investment adviser. The fees shared will not exceed any limit imposed by any regulatory agency. Persons referred to a third-party investment adviser by Indyfin LLC will receive a disclosure statement that details the fee sharing arrangement between Indyfin LLC and the third-party investment adviser. Indyfin LLC does not receive any fees directly from the referred individual.

Persons referred by Indyfin LLC to a third-party investment adviser will be subject to the fees charged by that third-party adviser; however, the portion of the fees due to Indyfin LLC will be paid solely from the third-party investment adviser's investment advisory fees received from the client, and will not result in any additional charge to any client.

Prospective advisory clients should be aware that they will likely incur an advisory fee charged by the third-party adviser, as well as certain fees and expenses imposed by other independent and unaffiliated third-parties. Such other fees and expenses may include, for example, brokerage and other transaction costs, qualified custodian fees, mutual fund or exchange traded fund fees and expenses, mark-ups and mark-downs, spreads paid to market makers, wire transfer fees, check-writing fees, early-redemption charges, certain deferred sales charges on previously-purchased mutual funds, margin fees, charges or interest, IRA and qualified retirement plan fees, and other fees and taxes on brokerage accounts and securities transactions.

Neither Indyfin LLC nor any of its supervised persons accepts compensation for the sale of securities or other investment products.

Item 6: Performance-Based Fees & Side-By-Side Management

Neither Indyfin LLC nor any of its supervised persons accepts performance-based fees (fees based on a share of capital gains or capital appreciation of the assets of a client).

Item 7: Types of Clients

Indyfin LLC provides technology-driven referral services to individuals who use our website platform to be matched with third-party investment advisers who may then provide those individuals with investment advisory services. Indyfin LLC does not have any applicable minimum account value requirement.

Item 8: Methods of Analysis, Investment Strategies & Risk of Loss

Indyfin LLC conducts due diligence on third-party investment advisers and their representatives that we refer individuals to.

For each investment adviser we consider their experience in providing financial advice including the number of clients they have as well as the amount of assets that they manage, years of experience, professional certifications, types of investment advisory services offered, type of clients they serve, and type of technology they use. We review the regulatory track record of the third-party investment advisers and do not accept investment adviser representatives with material disciplinary issues. When permissible, Indyfin LLC also collects feedback from current clients of third-party investment advisers and considers that in our approval process.

Indyfin LLC does not recommend any particular method of analysis or investment strategy to prospective advisory clients. Such analyses and strategies are implemented solely by the third-party investment advisers. However, prospective advisory clients should be aware that all forms of investing involve risk of loss that they should be prepared to bear, including analyses and investment strategies that are offered by a third-party investment adviser. There can be no guarantee that portfolios managed by a third-party investment adviser will continue to perform as expected, or will otherwise meet a prospective advisory client's expectations. Past performance does not guarantee future returns. Prospective advisory clients should independently and comprehensively evaluate any prospective investment adviser, including a third-party investment adviser, as such evaluation and the ultimate engagement decisions rests solely with a prospective advisory client in his or her absolute discretion.

For a complete description of a third-party investment adviser's methods of analysis, investment strategies, and risk of loss, please refer to such third-party investment adviser's brochure.

Our process for referring individuals to third-party investment advisers cannot ensure that those advisers will perform as desired and we will have no control over the day-to-day operations of any third-party investment advisers. The methods of analysis and investment strategies used by an investment adviser referred by Indyfin LLC will be disclosed in that investment adviser's disclosure brochure.

Item 9: Disciplinary Information

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management.

Item 10: Other Financial Industry Activities & Affiliations

Selection of Other Advisers or Managers and How this Adviser is Compensated for those Services

Indyfin LLC refers individuals to third-party investment advisers through our website platform. If a third-party investment adviser is engaged by a referral from Indyfin LLC, Indyfin LLC will be compensated by that adviser from a portion of the advisory fees earned by the investment adviser. This creates a conflict of interest in that Indyfin LLC could be deemed to have an incentive to refer individuals to third-party investment advisers that pay Indyfin LLC a larger fee share or pay such fee share on a schedule more favorable to Indyfin LLC. Indyfin LLC verifies that third-party advisers that we work with are registered, notice filed, or exempt from registration in the states where the referred individual is located.

Neither Indyfin LLC nor any of its management persons are registered, or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

Neither Indyfin LLC nor any of its management persons are registered, or have 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.

Neither Indyfin LLC nor any of its management persons have any relationship or arrangement with any related person below:

- broker-dealer, municipal securities dealer, or government securities dealer or broker
- investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund)
- futures commission merchant, commodity pool operator, or commodity trading advisor
- banking or thrift institution
- accountant or accounting firm
- lawyer or law firm

- insurance company or agency
- pension consultant
- real estate broker or dealer
- sponsor or syndicator of limited partnerships

Akshay Singh is an technology and strategy advisor to Respond.com, Inc. (doing business and referred to herein as “WiserAdvisor”), a separately-registered investment adviser that acquired Indyfin LLC’s matchmaking technology as part of a transaction that closed in July 2023. As a result of the transaction with WiserAdvisor, all or substantially all prospective advisory clients that interact with our interactive website platform will be referred to third-party advisers through WiserAdvisor. Indyfin LLC also licenses its interactive website platform technology from WiserAdvisor. Indyfin LLC pays WiserAdvisor a portion of the referral fee that it receives from third-party advisers for successful client referrals.

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

Our firm believes that business methodologies, ethics rules, and adopted policies are designed to eliminate or at least minimize material conflicts of interest and to appropriately manage any material conflicts of interest that may remain. You should be aware that no set of rules can possibly anticipate or relieve all material conflicts of interest.

Code of Ethics

We have adopted a Code of Ethics (the “**Code**”) that establishes policies for ethical conduct for our personnel. Our firm accepts the obligation not only to comply with all applicable laws and regulations but also to act in an ethical and professionally responsible manner in all professional services and activities. Firm policies include prohibitions against insider trading, circulation of industry rumors, and certain political contributions, among others. We periodically review and amend our Code to ensure that they remain current, and we require firm personnel to annually attest to their understanding of and adherence to the Code. A copy of the Code is made available to any client or prospective client upon request.

Neither Indyfin LLC nor any of its related persons recommends to clients, or buys or sells for client accounts, securities in which Integrity or any of its related persons has a material financial interest.

From time to time, Indyfin LLC or its related persons will invest in the same securities that a third-party investment adviser may recommend to a prospective advisory client. However, we are not privy to these investment recommendations. As such, this is not anticipated to create a conflict of interest.

From time to time, a third-party investment adviser or its related persons will buy or sell securities for prospective advisory client accounts at or about the same time that Indyfin LLC or a related person may happen to buy or sell the same securities for its own (or the related person’s own) account. However, we are not privy to these investment recommendations or the timing of when they may be made. As such, this is not anticipated to create a conflict of interest.

Item 12: Brokerage Practices

Indyfin LLC does not recommend or utilize the services of broker-dealers.

Because Indyfin LLC does not trade in any prospective advisory client accounts, it is not afforded the opportunity to engage in any order aggregation practices.

Item 13: Review of Accounts

Indyfin LLC does not monitor or otherwise review prospective advisory client accounts. Prospective advisory clients are encouraged to proactively reach out to their third-party investment adviser to discuss any changes to their personal or financial situation.

The custodial broker-dealer for prospective advisory clients should send account statements and reports directly no less frequently than quarterly. Such statements and reports will be mailed to prospective advisory clients at their address of record or delivered electronically, depending on the prospective advisory client's election. Indyfin LLC does not provide prospective advisory clients any additional reports.

Item 14: Client Referrals & Other Compensation

Indyfin LLC will enter into contractual agreements to act as a promoter/solicitor for third-party investment advisers. Pursuant to these agreements our compensation is derived entirely from referrals of users of our website and services to third-party investment advisers. If engaged by a referral from Indyfin LLC, the third-party investment adviser will pay a referral fee to Indyfin LLC from the fees earned by the investment adviser from that client, but is prohibited from charging any part of that fee to the client.

From time to time, we will also enter into arrangements with independent third-parties to purchase or otherwise acquire prospective advisory client leads, and thereafter direct such acquired prospective advisory clients to our interactive website to be matched with a third-party investment adviser.

Item 15: Custody

At no time will Indyfin LLC accept custody of a prospective advisory client's funds or securities in the capacity of a custodial broker-dealer or otherwise, and at all times advisory accounts will be held by a third-party qualified custodian as agreed between a prospective advisory client and the third-party investment adviser..

Item 16: Investment Discretion

Indyfin LLC does not have discretion over client accounts at any time.

Item 17: Voting Client Securities

Indyfin LLC will not ask for, nor accept voting authority for any client securities. Prospective advisory clients will receive their proxies or other solicitations directly from their custodial broker-dealer or a transfer agent, as applicable, and should direct any inquiries regarding such proxies or other solicitations directly to the sender or to the applicable third-party adviser.

Item 18: Financial Information

Since Indyfin LLC does not charge prospective advisory clients any fees, it does not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance.

Indyfin LLC does not have discretionary authority or custody of prospective advisory client funds or securities.