

Eden Intelligence Financial LLC Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of Eden Intelligence Financial LLC. If you have any questions about the contents of this brochure, please contact us at 206-756-1039 or by email at: reach.eden@edenintelfin.com. 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 Eden Intelligence Financial LLC is also available on the SEC's website at www.adviserinfo.sec.gov. Eden Intelligence Financial LLC's CRD number is: 328617.

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Registration as an investment adviser does not imply a certain level of skill or training.

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Item 2: Material Changes

Eden Intelligence Financial LLC has the following material changes to report. Material changes relate to Eden Intelligence Financial LLC's policies, practices or conflicts of interests.

- Eden Intelligence Financial LLC changed its billing frequency from advance to arrears. (Item 5)
- Eden Intelligence Financial LLC removed reference to Robo-advisory services. (Items 4,5 &8)
- Eden Intelligence Financial LLC removed reference to Betterment as a custodian. (Item 12)
- Eden Intelligence Financial LLC disclosed the use of Altruist Model Marketplace platform. (Items 4 & 5)
- Eden Intelligence Financial LLC has updated its Assets Under Management. (Item 4.E)

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Item 4: Advisory Business

A. Description of the Advisory Firm

Eden Intelligence Financial LLC (hereinafter “Edenintelfin”) is a Limited Liability Company organized in the State of Washington. The firm was formed in May 2023, and the principal owner is Liting Shao.

B. Types of Advisory Services

Portfolio Management Services

Edenintelfin offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. Edenintelfin creates an Investment Policy Statement for each client, which outlines the client’s current situation (income, tax levels, and risk tolerance levels). Portfolio management services include, but are not limited to, the following:

- Investment strategy
- Asset allocation
- Risk tolerance
- Personal investment policy
- Asset selection
- Regular portfolio monitoring

Edenintelfin evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. Edenintelfin will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction.

Edenintelfin seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of Edenintelfin’s economic, investment or other financial interests. To meet its fiduciary obligations, Edenintelfin attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, Edenintelfin’s policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client over another over time. It is Edenintelfin’s policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent, including initial public offerings (“IPOs”) and other investment opportunities that might have a limited supply, among its clients on a fair and equitable basis over time.

Edenintelfin may direct clients to third-party investment advisers. Before selecting other advisers for clients, Edenintelfin will verify that all recommended advisers are properly licensed, notice filed, or exempt in the states where Edenintelfin is recommending the

adviser to clients. Specifically, Edenintelfin may direct clients to or utilize the services of Dimensional, Vise or Morningstar Wealth. Clients will not incur any additional fees if Edenintelfin utilizes third-party investment advisers in their account.

Altruist Model Marketplace

Edenintelfin participates in the Model Marketplace of Altruist LLC, an SEC- registered investment adviser and affiliate of Altruist Financial LLC. Edenintelfin may assign to client accounts any of the available Altruist LLC- generated portfolios, Third-Party Portfolios, or other portfolios made available through Altruist LLC's Model Marketplace. All Altruist LLC advisory fees for assigned portfolios are charged directly to client accounts.

Financial Planning

Financial plans and financial planning may include, but are not limited to: investment planning; life insurance; tax concerns; retirement planning; college planning; and debt/credit planning. Edenintelfin provides comprehensive Financial planning (via virtual online meeting). There are several packages available for comprehensive wealth planning where Edenintelfin will charge a fixed fee. In person comprehensive financial planning can also be charged at an hourly fee.

Services Limited to Specific Types of Investments

Edenintelfin generally limits its investment advice to mutual funds, fixed income securities, insurance products including annuities, equities, hedge funds, private equity funds, ETFs (including ETFs in the gold and precious metal sectors), treasury inflation protected/inflation linked bonds, non-U.S. securities, venture capital funds and private placements, although Edenintelfin primarily recommends ETFs personalized index investing (single securities). Edenintelfin may use other securities as well to help diversify a portfolio when applicable.

Written Acknowledgement of Fiduciary Status

When we provide 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. We also have a fiduciary duty under the Investment Advisers Act of 1940 with respect to all client 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. Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations

- (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

C. Client Tailored Services and Client Imposed Restrictions

For portfolio management, Edenintelfin offers the same suite of services to all of its clients. However, specific client investment strategies and their implementation are dependent upon the client Investment Policy Statement which outlines each client's current situation (income, tax levels, and risk tolerance levels). Clients may not impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs.

D. Wrap Fee Programs

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees and transaction costs. Edenintelfin does not participate in wrap fee programs.

E. Assets Under Management

Edenintelfin has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$ 3,509,278.00	\$ 0.00	October 2024

Item 5: Fees and Compensation

A. Fee Schedule

In-Person Portfolio Management Fees

Total Assets Under Management	Annual Fees
\$100,000 - \$499,999	0.95%

Total Assets Under Management	Annual Fees
\$500,000 - \$1,000,000	0.90%
\$1,000,000 - \$1,500,000	0.85%
\$1,500,000 - \$2,000,000	0.80%
\$2,000,000 - \$3,000,000	0.75%
\$3,000,000 - \$4,000,000	0.70%
\$4,000,000 - \$5,000,000	0.65%
\$5,000,000 AND UP	0.55%

An average of the daily balance in the client's account throughout the billing period is used to determine the market value of the assets upon which the advisory fee is based.

These fees are generally negotiable and the final fee schedule will be memorialized in the client's advisory agreement. Clients may terminate the agreement without penalty for a full refund of Edenintelfin's fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract generally with 5 days' written notice.

Altruist LLC Platform Fees

Based on the selection by the Advisor on behalf of the Client Account of a Model Portfolio, Altruist charges a fee to each Advisor that is paid on a pro-rata annualized basis monthly in arrears based on the value of the assets subscribed to a Model Portfolio in an Account on the last day of the previous month. Fees are generally based on a percentage of the market value of the assets in the Account. Altruist's fee may range from 0% to 1%. Altruist will instruct the applicable Participating Broker-Dealer to deduct Altruist's fee for the Platform from Advisor's fee (house) account at the Participating Broker-Dealer, or if Advisor instructs, from Client Accounts. If Altruist is unable to deduct its fee from Client's Account according to an instruction from Advisor, then Advisor hereby agrees to be responsible for such fee.

Clients are charged regular AUM-based fees based on the fee schedule listed above for use of the Altruist Platform.

Financial Planning Fees

Package	Basic	Essential	Professional	Entrepreneur	Elite
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Price	\$998	\$1,298	\$1,598	\$1,898	\$2,198
Typical Clients	Individuals who have W2	Individuals who have W2, investments and rental property	Employees from big tech firms; early employees who received options from startups.	Real estate agents, insurance agents, freelance professionals, doctors, dentists, lawyers, business owners	Business owner with complex income and tax structure. Or Pre/Post immigration wealth planning

Financial Life Planning

Guides you in strategically managing your finances to support your life's journey and goals, including advisory on children education fund, insurance coverage, investment, retirement planning, estate planning. This service is included in the platform fee Basic, Essential, Professional, Entrepreneur, and Elite Packages and could also be charged at an hourly fee.

Employee Benefits

Assist you in navigating your employer's benefits, ensuring you make informed choices that align with your financial goals and needs. This service is included in the Essential, Professional, Entrepreneur, and Elite packages.

Tax Planning

Offer strategies to minimize your current tax burden and effectively manage your long-term tax liabilities. Additionally, we maintain partnerships with tax preparation firms to handle your tax filing needs. While these firms have independent fee structures, we recommend their services to streamline document collection and ensure that any tax-related insights are seamlessly integrated into your overall financial plan. This service is included in the Essential, Professional, Entrepreneur, and Elite packages.

Equity compensation (RSUs, ISOs, NQSOs)

Advice on optimizing your total compensation while carefully evaluating and mitigating the risks of over-exposure in your portfolio. This service is included in the Professional and Elite packages.

Business (Schedule C, LLC, LP, Inc)

Provide integrated financial planning, focusing on efficient tax strategies, income management, investment balancing, and risk mitigation, to achieve both personal financial goals and business growth. This service is included in the Entrepreneur and Elite packages.

Business (Scrop, C corp) or Pre/Postimmigration financial planning

Choose one of the two services below. With additional \$300 charge, you can choose both:

1) Provide strategic coordination of personal and corporate finances, focusing on tax efficiency, income distribution, investment strategies, and risk management, tailored to harmonize personal financial goals with the growth and stability of their businesses. This service is included in the Elite package.

2) Pre- or post-immigration financial planning focuses on adapting and aligning financial strategies to new regulatory environments, managing tax implications, insurance considerations, asset relocation, and ensuring continuity in investment and retirement planning, tailored to the individual's transitional phase and long-term financial objective

Fixed Fees

The negotiated fixed rate for In Person Financial Planning is between \$998 and \$2,198 depending on the package selected.

Hourly Fees

The fee \$500.00 per hour and is negotiable for a special promotion.

Clients may terminate the agreement without penalty, for full refund of Edenintelfin's fees, within five business days of signing the Financial Planning Agreement, unless Eden has delivered the financial planning services. If Eden has delivered the financial planning services, no refund will be given. Thereafter, clients may terminate the Financial Planning Agreement generally upon written notice.

B. Payment of Fees

Payment of Portfolio Management Fees

Asset-based portfolio management fees are withdrawn directly from the client's accounts by the custodian with client's written authorization on a monthly basis. Fees are paid in arrears.

Payment of Financial Planning Fees

Fixed financial planning fees are paid in arrears.

Hourly financial planning fees are paid in arrears.

Financial planning fees are paid via secure third-party credit card processor via Edenintelfin's website.

C. Client Responsibility For Third Party Fees

Clients are responsible for the payment of all third party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by Edenintelfin. Please see Item 12 of this brochure regarding broker-dealer/custodian.

D. Prepayment of Fees

Edenintelfin collects its fees in arrears. It does not collect fees in advance.

E. Outside Compensation For the Sale of Securities to Clients

Liting Shao in her outside business activities (see Item 10 below) is licensed to accept compensation for the sale of investment products to Edenintelfin clients. This presents a conflict of interest and gives the supervised person an incentive to recommend products based on the compensation received rather than on the client's needs. When recommending the sale of securities or investment products for which the supervised persons receives compensation, Edenintelfin will document the conflict of interest in the client file and inform the client of the conflict of interest. Clients always have the right to decide whether to purchase Edenintelfin -recommended products and, if purchasing, have the right to purchase those products through other brokers or agents that are not affiliated with Edenintelfin.

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

Edenintelfin does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

Item 7: Types of Clients

Edenintelfin generally provides advisory services to the following types of clients:

- ❖ Individuals
- ❖ High-Net-Worth Individuals
- ❖ Charitable Organizations
- ❖ Corporations or Business Entities

❖ Trusts

There is no account minimum.

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

A. Methods of Analysis and Investment Strategies

Methods of Analysis

Edenintelfin's methods of analysis include charting analysis, fundamental analysis, technical analysis, cyclical analysis, quantitative analysis and modern portfolio theory.

Charting analysis involves the use of patterns in performance charts. Edenintelfin uses this technique to search for patterns used to help predict favorable conditions for buying and/or selling a security.

Fundamental analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

Technical analysis involves the analysis of past market data; primarily price and volume.

Cyclical analysis involves the analysis of business cycles to find favorable conditions for buying and/or selling a security.

Quantitative analysis deals with measurable factors as distinguished from qualitative considerations such as the character of management or the state of employee morale, such as the value of assets, the cost of capital, historical projections of sales, and so on.

Modern portfolio theory is an investment approach that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, by carefully choosing the proportions of various assets.

Investment Strategies

Edenintelfin uses long term trading.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

B. Material Risks Involved

Methods of Analysis

Charting analysis strategy involves using and comparing various charts to predict long and short term performance or market trends. The risk involved in using this method is that only past performance data is considered without using other methods to crosscheck data. Using charting analysis without other methods of analysis would be making the assumption that past performance will be indicative of future performance. This may not be the case.

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Technical analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not work long term.

Cyclical analysis assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are two-fold: 1) the markets do not always repeat cyclical patterns and 2) if too many investors begin to implement this strategy, it changes the very cycles these investors are trying to exploit.

Quantitative analysis. Investment strategies using quantitative models may perform differently than expected as a result of, among other things, the factors used in the models, the weight placed on each factor, changes from the factors' historical trends, and technical issues in the construction and implementation of the models.

Modern Portfolio Theory assumes that investors are risk averse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio exists with a more favorable risk-expected return profile – i.e., if for that level of risk an alternative portfolio exists which has better expected returns.

Investment Strategies

Long term trading is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that

will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

Selection of Other Advisers: Although Edenintelfin will seek to select only money managers who will invest clients' assets with the highest level of integrity, Edenintelfin's selection process cannot ensure that money managers will perform as desired and Edenintelfin will have no control over the day-to-day operations of any of its selected money managers. Edenintelfin would not necessarily be aware of certain activities at the underlying money manager level, including without limitation a money manager's engaging in unreported risks, investment "style drift" or even regulatory breaches or fraud.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

C. Risks of Specific Securities Utilized

Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below (leaving aside Treasury Inflation Protected/Inflation Linked Bonds) are not guaranteed or insured by the FDIC or any other government agency.

Mutual Funds: Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond "fixed income" nature (lower risk) or stock "equity" nature.

Equity investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or 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 conditions and the general economic environments.

Fixed income investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include 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 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 (extremely unlikely); however, they carry a potential risk of losing share price value, albeit

rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

Exchange Traded Funds (ETFs): An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Risks in investing in ETFs include trading risks, liquidity and shutdown risks, risks associated with a change in authorized participants and non-participation of authorized participants, risks that trading price differs from indicative net asset value (iNAV), or price fluctuation and disassociation from the index being tracked. With regard to trading risks, regular trading adds cost to your portfolio thus counteracting the low fees that one of the typical benefits of ETFs. Additionally, regular trading to beneficially “time the market” is difficult to achieve. Even paid fund managers struggle to do this every year, with the majority failing to beat the relevant indexes. With regard to liquidity and shutdown risks, not all ETFs have the same level of liquidity. Since ETFs are at least as liquid as their underlying assets, trading conditions are more accurately reflected in implied liquidity rather than the average daily volume of the ETF itself. Implied liquidity is a measure of what can potentially be traded in ETFs based on its underlying assets. ETFs are subject to market volatility and the risks of their underlying securities, which may include the risks associated with investing in smaller companies, foreign securities, commodities, and fixed income investments (as applicable). Foreign securities in particular are subject to interest rate, currency exchange rate, economic, and political risks, all of which are magnified in emerging markets. ETFs that target a small universe of securities, such as a specific region or market sector, are generally subject to greater market volatility, as well as to the specific risks associated with that sector, region, or other focus. ETFs that use derivatives, leverage, or complex investment strategies are subject to additional risks. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed “electronic shares” not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors. The return of an index ETF is usually different from that of the index it tracks because of fees, expenses, and tracking error. An ETF may trade at a premium or discount to its net asset value (NAV) (or indicative value in the case of exchange-traded notes). The degree of liquidity can vary significantly from one ETF to another and losses may be magnified if no liquid market exists for the ETF’s shares when attempting to sell them. Each ETF has a unique risk profile, detailed in its prospectus, offering circular, or similar material, which should be considered carefully when making investment decisions.

Annuities are a retirement product for those who may have the ability to pay a premium now and want to guarantee they receive certain monthly payments or a return on investment later in the future. Annuities are contracts issued by a life insurance company designed to meet requirement or other long-term goals. An annuity is not a life insurance policy. Variable annuities are designed to be long-term investments, to meet retirement and other long-range goals. Variable annuities are not suitable for meeting short-term

goals because substantial taxes and insurance company charges may apply if you withdraw your money early. Variable annuities also involve investment risks, just as mutual funds do.

Hedge funds often engage in leveraging and other speculative investment practices that may increase the risk of loss; can be highly illiquid; are not required to provide periodic pricing or valuation information to investors; May involve complex tax structures and delays in distributing important tax information; are not subject to the same regulatory requirements as mutual funds; and often charge high fees. In addition, hedge funds may invest in risky securities and engage in risky strategies.

Private equity funds carry certain risks. Capital calls will be made on short notice, and the failure to meet capital calls can result in significant adverse consequences, including but not limited to a total loss of investment.

Private placements carry a substantial risk as they are subject to less regulation than are publicly offered securities, the market to resell these assets under applicable securities laws may be illiquid, due to restrictions, and the liquidation may be taken at a substantial discount to the underlying value or result in the entire loss of the value of such assets.

Personal Indexing is the process of tracking the performance of an index by buying a sample of individual stocks instead of an index ETF and using optimization techniques to control risk exposures. This differs from traditional index mutual fund and ETF investing where you own shares in the fund, but it's the fund that owns the stocks. By purchasing the individual stocks that make up an index at the same weights as the index, personalized indexing can put greater control in the hands of individual investors.

Venture capital funds invest in start-up companies at an early stage of development in the interest of generating a return through an eventual realization event; the risk is high as a result of the uncertainty involved at that stage of development.

Non-U.S. securities present certain risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available.

Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Item 9: Disciplinary Information

A. Criminal or Civil Actions

There are no criminal or civil actions to report.

B. Administrative Proceedings

There are no administrative proceedings to report.

C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

A. Registration as a Broker/Dealer or Broker/Dealer Representative

Neither Edenintelfin nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither Edenintelfin nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

Liting Shao is a licensed insurance agent. This activity creates a conflict of interest since there is an incentive to recommend insurance products based on commissions or other benefits received from the insurance company, rather than on the client's needs. Additionally, the offer and sale of insurance products by supervised persons of Edenintelfin are not made in their capacity as a fiduciary, and products are limited to only those offered by certain insurance providers. Edenintelfin addresses this conflict of interest by requiring its supervised persons to act in the best interest of the client at all times, including when acting as an insurance agent. Edenintelfin periodically reviews recommendations by its supervised persons to assess whether they are based on an objective evaluation of each client's risk profile and investment objectives rather than on the receipt of any commissions or other benefits. Edenintelfin will disclose in advance how it or its supervised persons are compensated and will disclose conflicts of interest involving any advice or service provided. At no time will there be tying between business practices and/or services (a condition where a client or prospective client would be required to accept one product or service conditioned upon the selection of a second, distinctive tied product or service). No client is ever under any obligation to purchase any insurance product. Insurance products recommended by Edenintelfin's supervised persons may also be available from other providers on more favorable terms, and clients

can purchase insurance products recommended through other unaffiliated insurance agencies.

D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections

Edenintelfin has discretion to choose third-party investment advisers to manage all or a portion of the client's assets. Clients will not incur any additional fees if Edenintelfin utilizes third-party investment advisers in their account. The fees will not exceed any limit imposed by any regulatory agency. Edenintelfin will always act in the best interests of the client, including when determining which third-party investment adviser to recommend to clients. Edenintelfin will ensure that all recommended advisers are licensed or notice filed in the states in which Edenintelfin is recommending them to clients.

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

A. Code of Ethics

Edenintelfin has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. Edenintelfin's Code of Ethics is available free upon request to any client or prospective client.

B. Recommendations Involving Material Financial Interests

Edenintelfin does not recommend that clients buy or sell any security in which a related person to Edenintelfin or Edenintelfin has a material financial interest.

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of Edenintelfin may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of Edenintelfin to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. Edenintelfin will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

D. Trading Securities At/Around the Same Time as Clients' Securities

From time to time, representatives of Edenintelfin may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of Edenintelfin to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest; however, Edenintelfin will never engage in trading that operates to the client's disadvantage if representatives of Edenintelfin buy or sell securities at or around the same time as clients.

Item 12: Brokerage Practices

A. Factors Used to Select Custodians and/or Broker/Dealers

Custodians/broker-dealers will be recommended based on Edenintelfin's duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients will not necessarily pay the lowest commission or commission equivalent, and Edenintelfin may also consider the market expertise and research access provided by the broker-dealer/custodian, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers that may aid in Edenintelfin's research efforts. Edenintelfin will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian.

Edenintelfin will require clients to use Charles Schwab & Co., Inc, or Altruist.

1. Research and Other Soft-Dollar Benefits

While Edenintelfin has no formal soft dollars program in which soft dollars are used to pay for third party services, Edenintelfin may receive research, products, or other services from custodians and broker-dealers in connection with client securities transactions ("soft dollar benefits"). Edenintelfin may enter into soft-dollar arrangements consistent with (and not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended. There can be no assurance that any particular client will benefit from soft dollar research, whether or not the client's transactions paid for it, and Edenintelfin does not seek to allocate benefits to client accounts proportionate to any soft dollar credits generated by the accounts. Edenintelfin benefits by not having to produce or pay for the research, products or services, and Edenintelfin will have an incentive to recommend a broker-dealer based on receiving research or services. Clients should be aware that Edenintelfin's

acceptance of soft dollar benefits may result in higher commissions charged to the client.

2. *Brokerage for Client Referrals*

Edenintelfin receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

3. *Clients Directing Which Broker/Dealer/Custodian to Use*

Edenintelfin will require clients to use a specific broker-dealer to execute transactions. Not all advisers require clients to use a particular broker-dealer.

B. Aggregating (Block) Trading for Multiple Client Accounts

If Edenintelfin buys or sells the same securities on behalf of more than one client, then it may (but would be under no obligation to) aggregate or bunch such securities in a single transaction for multiple clients in order to seek more favorable prices, lower brokerage commissions, or more efficient execution. In such case, Edenintelfin would place an aggregate order with the broker on behalf of all such clients in order to ensure fairness for all clients; provided, however, that trades would be reviewed periodically to ensure that accounts are not systematically disadvantaged by this policy. Edenintelfin would determine the appropriate number of shares and select the appropriate brokers consistent with its duty to seek best execution.

Item 13: Review of Accounts

A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

All on portfolio management client accounts for Edenintelfin's advisory services provided on an ongoing basis are reviewed at least quarterly by Liting Shao, Managing Partner and Chief Compliance Officer, with regard to clients' respective investment policies and risk tolerance levels. All accounts at Edenintelfin are assigned to this reviewer.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Liting Shao, Managing Partner and Chief Compliance Officer. Financial planning clients are provided a one-time financial plan concerning their financial situation. After the presentation of the plan, there are no further reports. Clients may request additional plans or reports for a fee.

B. Factors That Will Trigger a Non-Periodic Review of Client Accounts

Reviews for portfolio management may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

With respect to financial plans, Edenintelfin's services will generally conclude upon delivery of the financial plan.

C. Content and Frequency of Regular Reports Provided to Clients

Each client of Edenintelfin's advisory services provided on an ongoing basis will receive a monthly report detailing the client's account, including assets held, asset value, and calculation of fees. This written report will come from the custodian.

Each financial planning client will receive the financial plan upon completion.

Item 14: Client Referrals and Other Compensation

A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

Other than soft dollar benefits as described in Item 12 above and the benefits below, Edenintelfin does not receive any economic benefit, directly or indirectly from any third party for advice rendered to Edenintelfin clients.

Charles Schwab & Co., Inc. Advisor Services provides Edenintelfin with access to Charles Schwab & Co., Inc. Advisor Services' institutional trading and custody services, which are typically not available to Charles Schwab & Co., Inc. Advisor Services retail investors. These services generally are available to independent investment advisers on an unsolicited basis, at no charge to them so long as a total of at least \$10 million of the adviser's clients' assets are maintained in accounts at Charles Schwab & Co., Inc. Advisor Services. Charles Schwab & Co., Inc. Advisor Services includes brokerage services that are related to the execution of securities transactions, custody, research, including that in the form of advice, analyses and reports, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment. For Edenintelfin client accounts maintained in its custody, Charles Schwab & Co., Inc. Advisor Services generally does not charge separately for custody services but is compensated by account holders through commissions or other transaction-related or asset-based fees for securities trades that are executed through Charles Schwab & Co., Inc. Advisor Services or that settle into Charles Schwab & Co., Inc. Advisor Services accounts.

Charles Schwab & Co., Inc. Advisor Services also makes available to Edenintelfin other products and services that benefit Edenintelfin but may not benefit its clients' accounts. These benefits may include national, regional or Edenintelfin specific educational events organized and/or sponsored by Charles Schwab & Co., Inc. Advisor Services. Other potential benefits may include occasional business entertainment of personnel of Edenintelfin by Charles Schwab & Co., Inc. Advisor Services personnel, including meals, invitations to sporting events, including golf tournaments, and other forms of entertainment, some of which may accompany educational opportunities. Other of these products and services assist Edenintelfin in managing and administering clients' accounts. These include software and other technology (and related technological training) that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts, if applicable), provide research, pricing information and other market data, facilitate payment of Edenintelfin's fees from its clients' accounts (if applicable), and assist with back-office training and support functions, recordkeeping and client reporting. Many of these services generally may be used to service all or some substantial number of Edenintelfin's accounts. Charles Schwab & Co., Inc. Advisor Services also makes available to Edenintelfin other services intended to help Edenintelfin manage and further develop its business enterprise. These services may include professional compliance, legal and business consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, employee benefits providers, and human capital consultants, insurance and marketing. In addition, Charles Schwab & Co., Inc. Advisor Services may make available, arrange and/or pay vendors for these types of services rendered to Edenintelfin by independent third parties. Charles Schwab & Co., Inc. Advisor Services may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to Edenintelfin. Edenintelfin is independently owned and operated and not affiliated with Charles Schwab & Co., Inc. Advisor Services.

B. Compensation to Non - Advisory Personnel for Client Referrals

Solicitor relationships will be fully disclosed to each Client to the extent required by applicable law. Edenintelfin will ensure each solicitor is exempt, notice filed, or properly registered in all appropriate jurisdictions. All such referral activities will be conducted in accordance with Rule 206(4)-1 under the Advisers Act, where applicable.

Item 15: Custody

When advisory fees are deducted directly from client accounts at client's custodian, Edenintelfin will be deemed to have limited 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.

Item 16: Investment Discretion

Edenintelfin provides discretionary and non-discretionary investment advisory services to clients. The advisory contract established with each client sets forth the discretionary authority for trading. Where investment discretion has been granted, Edenintelfin generally manages the client's account and makes investment decisions without consultation with the client as to when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, what securities to buy or sell, or the price per share.

Item 17: Voting Client Securities (Proxy Voting)

Edenintelfin will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

Item 18: Financial Information

A. Balance Sheet

Edenintelfin neither requires nor solicits prepayment of more than \$1,200 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither Edenintelfin nor its management has any financial condition that is likely to reasonably impair Edenintelfin's ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years

Edenintelfin has not been the subject of a bankruptcy petition in the last ten years.