

## Item 1. Introduction

Magnifi, LLC (“Magnifi”, the “Firm” or “we”) is registered as an investment adviser with the Securities and Exchange Commission. Brokerage and investment advisory services and fees differ, and it is important for you to understand the differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://www.investor.gov/crs), which also provides educational materials about broker-dealers, investment advisers and investing.

## Item 2. Relationships and Services

### What investment services and advice can you provide me?

Magnifi uses proprietary web-based technology to provide a natural language powered platform which enables users to navigate a universe of exchange-traded funds (“ETFs”), individual stocks, and mutual funds, while using such information to build and/or enhance the user’s existing portfolios. Magnifi’s platform is utilized by investors (the “Clients”). Magnifi’s algorithms use technology and science to personalize and facilitate discovery, comparison, and action in the investment process by generating investment recommendations based on Clients’ natural language searches, unique goals, investment types, risk tolerance, and other information inputted by the Client in Magnifi’s website and/or mobile application.

Pursuant to each Client’s investment advisory agreement with Magnifi (“IA Agreement”), Magnifi provides investment recommendations and portfolio management services through its website and mobile application with the objective of enabling Clients to personalize their investment preferences, receive analysis and/or recommendations of ETFs, individual stocks, and mutual funds, and create and edit mock portfolios and watchlists. Clients may utilize Magnifi’s platform to discover investments using natural language searches and analyze and compare information compiled by Magnifi’s web-based platform regarding ETFs, mutual funds, and individual stocks. Clients may build proposals and track aggregated investments directly on Magnifi’s platform. Magnifi’s investment recommendations are based on financial and other information you submit through our website. Magnifi does not have discretionary authority over your account, which means we do not determine the securities that you buy or sell, the amount of securities that you buy or sell, the broker-dealer you use for your purchase or sale of securities, and commission rates that you pay to a broker-dealer in your account. You should be aware that your individual accounts are not actively monitored directly by investment advisory personnel.

Magnifi offers a subscription option providing value as an Investing Assistant using conversational AI. Through a chat bot experience the Magnifi Subscription gives users access to conversational investing guidance, portfolio insights, market intelligence, and educational resources to help investors make more informed decisions.

**Requirements to Open and Maintain an Account:** Magnifi delivers certain access to information regarding ETFs, individual stocks, and mutual funds without charge. There is no requirement to open a brokerage account to obtain these services.

**For additional information** regarding our investment advisory services, please see Items 4, 5 and 8 of our Form ADV Part 2A (our “[Form ADV](#)”).

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

- *Given my financial situation, should I choose an investment advisory service? Why or why not?*
- *How will you choose investments to recommend to me?*
- *What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?*

## Item 3. Fees, Costs, Conflicts & Standards of Conduct

### What fees will I pay?

Magnifi delivers certain access to information regarding ETFs, individual stocks, and mutual funds at no charge however if Clients elect to subscribe to Magnifi, which offers a conversational AI assistant, the Client will be charged a monthly fee.

Fees paid to Magnifi for investment advisory services are separate and distinct from the fees and expenses charged by the ETFs and/or mutual funds in which a Client’s assets are invested, sometimes referred to as internal expenses. The ETFs and/or mutual funds charge their own separate management fees and bear other expenses, as described in each fund’s prospectus. Magnifi does not earn or receive a portion of such fees. Except with respect to Fund Managers who pay fees to sponsor and increase awareness of their ETFs, mutual funds, or model portfolios in search results, Magnifi is not contractually or otherwise committed to recommend any ETF, mutual fund, or model portfolio.

Please refer to Magnifi's [ADV Part 2A](#) as well as your IA Agreement for a full disclosure of relevant fees, costs and expenses.

**You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.**

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

- *Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?*

**What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?**

**When we act as your investment adviser**, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask about these conflicts because they can affect the investment advice we provide you.

For example, Magnifi has entered into partnerships with various financial institutions that may be registered investment advisers to ETFs and/or mutual funds (collectively, the "Fund Managers"). Under these arrangements, Magnifi may license its proprietary web-based technology to the Fund Managers in connection with the Fund Managers' own research and sales activities, and permit Fund Managers to sponsor additional features to enhance the visibility of information provided about the ETFs, mutual funds, and/or model portfolios managed by the Fund Managers. By sponsoring personalized fund selectors identified as "Sponsored" in search results, Fund Managers can create awareness for their ETFs, mutual funds, and/or model portfolios during the discovery phase to stand out with financial advisors during key fund comparison moments. Sponsored Investment Products will be returned as the top search results when clients use Magnifi's search function, and are promoted on the website.

**For additional information** regarding our management of potential conflicts of interests, please see Item 10 of our [Form ADV](#).

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

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

**How do your financial professionals make money?**

We do not employ financial professionals or financial advisors to provide investment advice. Our investment services are entirely managed by software.

**Item 4. Do you or your financial professionals have legal or disciplinary history?**

No. For further information, please visit [Investor.gov/CRS](https://www.investor.gov/CRS) for a free and simple search tool where you can research us and our financial professionals.

**Item 5. Additional Information**

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

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

- *Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if this person if I have concerns about how this person is treating me*