



# INTEGRITY

## WEALTH SOLUTIONS

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Denver, CO 80237  
303.716.5777  
[www.integrity-wealth.com](http://www.integrity-wealth.com)*

## Form ADV Part 2A – Firm Brochure

March 3, 2025

This brochure provides information about the qualifications and business practices of Integrity Wealth Solutions. Please contact Clint Thomas ([clint@integrity-wealth.com](mailto:clint@integrity-wealth.com)), Owner, or Justina Welch ([justina@integrity-wealth.com](mailto:justina@integrity-wealth.com)), Owner, at 303.716.5777, if you have any questions about the contents of this brochure.

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 Integrity Wealth Solutions is available on the Internet at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by a unique identifying number, known as a CRD number. The CRD number for Integrity Wealth Solutions is 284862. Registration as a Registered Investment Adviser does not imply a certain level of skill or training.

## **Item 2 - Material Changes**

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Since the last annual update of our firm's Form ADV Brochure, dated February 27, 2024, the Firm has no material changes to report.

### ***Full Brochure Available***

Whenever you would like to receive a copy of our Firm Brochure, please contact us by telephone at: 303.716.5777 or by email at [info@integrity-wealth.com](mailto:info@integrity-wealth.com).

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## **Item 4 - Advisory Business**

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Integrity Wealth Solutions (IWS) has been providing wealth management consulting services to clients since August 2016. The principal owners are Clint Thomas and Justina Welch. We have no public or privately-owned affiliated companies.

IWS provides portfolio management and financial planning services, including investment advice to individuals and families and ERISA retirement plans. Portfolio management services include developing an investment policy statement, building portfolio recommendations, and implementing these recommendations at a third-party custodian (see *Custody*) by entering purchase and sell orders on client's behalf. Portfolio management services also include the ongoing monitoring of the investment portfolio, including quarterly performance reporting, asset allocation analysis, rebalancing and tax-loss harvesting recommendations. Investment recommendations are primarily limited to open-end mutual funds and exchange-traded funds and help clients with existing positions in individual stocks and bonds. We typically do not advise our clients to invest in individual stocks and bonds.

All client portfolios are customized and built for each individual relationship, although many clients will hold similar securities and allocations. Although we will try and accommodate client's requested portfolio restrictions to the best of our ability, we may not be able to due to the nature of the mutual funds and ETFs in the portfolio. The portfolio construction process begins with a discussion of the client's goals and risk tolerance to determine a suitable long-term investment portfolio. We do not participate in wrap fee programs.

Financial planning services include retirement income planning, asset allocation/portfolio evaluation, education funding planning, investment selection, income tax planning, risk management, multi-generational financial planning, and general estate planning. If applicable, we will incorporate assets held outside of our firm into the comprehensive financial planning process. Examples of these types of assets could be, but are not limited to, 401(k), 403(b), and 529 accounts.

IWS can engage a client in tax planning and estate planning discussions, although the firm does not prepare tax returns and does not draft estate plan documents. The firm can work in concert with tax accountants and estate attorneys to assist the client in determining the most proper plan regarding their income taxes and various estate planning concerns.

For asset allocation and investment selection, IWS treats each client relationship as separate and unique. Portfolio allocations of cash, fixed income, and equity mutual funds and ETFs and other types of investments are determined on a client-by-client basis, based on discussions with each client as to their tolerance for risk. Investment selection is also customized to utilize investments that may offer more tax-efficiency (municipal bonds or exchange-traded funds, for example) for non-retirement accounts, depending on the client's current income tax situation.

IWS provides ongoing monitoring and standard reporting on each client's investment portfolio. Additionally, IWS will schedule an annual financial planning meeting to review the client's overall situation and update portions of the financial plan, as required. In addition to reviewing portfolio composition and performance, these meetings typically include tax planning, retirement planning, risk management and/or estate planning advice and consultation.

IWS portfolio management services may provide investment advice to some of its clients with held away assets, such as annuities, 529 plans, 401(k), 403(b), TSP, or other employer retirement plans. This service allows IWS to incorporate these assets into the client’s entire asset allocation, which thereby helps create a more diversified portfolio tailored to the client’s goals and risk tolerance. Please note, we will not execute any trades in these types of accounts, trading in these accounts will be the responsibility of the client.

IWS provides fiduciary services, including 3(21) fiduciary services, to ERISA retirement plans, including profit sharing 401(k) plans and defined benefit plans. These services include investment plan offering review and selection, model portfolio development, monitoring and management and regular compliant reporting to plan sponsors.

IWS hereby acknowledges that it is a "fiduciary" when the firm’s services are subject to the provisions of ERISA of 1974, as amended.

As of December 31, 2024, IWS manages \$276,554,504 assets under management on a discretionary basis and \$6,750 assets under management on a non-discretionary basis.

## Item 5 - Fees and Compensation

IWS compensation depends on the type of advisory service we are performing. Please review the fee and compensation information below.

### Asset Management

IWS annual fee is calculated in accordance with the fee schedule below. Asset management services, including financial planning and portfolio management, are provided on an active basis for accounts with an appropriate minimum value, typically \$500,000.

Assets Managed	Annualized Fee	Quarterly Fee
\$500,001 - \$1,000,000	\$5,000	\$1,250
\$1,000,001 - \$3,000,000	\$7,500	\$1,875
\$3,000,001 - \$6,000,000	\$10,000	\$2,500
\$6,000,001 - \$10,000,000	\$15,000	\$3,750
\$10,000,001 - \$15,000,000	\$25,000	\$6,250
\$15,000,001 - \$25,000,000	\$40,000	\$10,000
\$25,000,001 - \$40,000,000	\$60,000	\$15,000
\$40,000,001 - \$55,000,000	\$80,000	\$20,000
\$55,000,001 - \$70,000,000	\$100,000	\$25,000
\$70,000,001 - \$85,000,000	\$120,000	\$30,000
\$85,000,001 - \$100,000,000	\$140,000	\$35,000
\$100,000,001 and above	Negotiable	Negotiable

***IWS will accept asset management relationships under \$500,000 in billable assets.*** For accounts that are within this range there is an annual fee of 1% charged quarterly determined based on the value of the assets at the end of each calendar quarter. For relationships under \$500,000, financial planning services may be billed separately on a per-project basis.

Fees for asset management will be pro-rated to the end of the initial calendar quarter and will be charged at the beginning of each calendar quarter (in advance) thereafter based on the value of billable assets on the last business day of prior calendar quarter end.

Clients terminating their contract with IWS within the first five days are entitled to a full refund. Should a client terminate the relationship with IWS outside the five-day window, the unearned portion of the asset management fee will be refunded.

Clients may elect to pay this fee directly or have the quarterly charge deducted from investment accounts. Please refer to Custody on Page 11 for information regarding fees deducted from investment accounts.

For Clients that elect direct invoicing - IWS will invoice Client on a quarterly basis at the beginning of each calendar quarter. Management fees will be due within 30 days of invoice billing date. Management fees not paid after 45 days from the beginning of the billable quarter may result in the termination of relationship with IWS.

Clients where IWS is providing asset management services on held away assets, clients may either pay our asset management fee through a deduction from a taxable account (e.g., non-IRA or other non-retirement investment account) held at the custodian of record or through direct invoicing.

IWS asset management fee and account minimums are negotiable under certain circumstances.

Clients may incur fees from the custodian selected to provide services related to record keeping, tax reporting and statement production. These fees may include IRA and retirement account annual fees, nominal trade ticket charges or banking fees. Clients will be subject to the annual operating expenses of the mutual funds and ETFs themselves. Detailed information on mutual fund and ETFs expenses are contained in the prospectus for each fund or ETF, which is delivered to clients by the custodian. No portion of these fees is retained by or remitted to IWS. See *Brokerage Practices*.

### **Financial Planning Services**

For new asset management clients with relationships under \$500,000, the initial financial plan may be billed separately on a one-time basis. After the initial financial plan, ongoing financial planning services are included in the asset management fee. Asset management clients with relationships above \$500,000, the financial planning services are included in the asset management fee as outlined in the table above.

The typical fee for planning service is \$3,000; however, this fee can range from \$1,000 to \$5,000, depending upon the scope and complexity of the work to be performed.

At IWS discretion, IWS may accept one-time project-based financial planning on a fixed fee basis.

IWS will invoice Client upon completion and delivery of financial plan and fees will be due to IWS within 30 days. Clients may terminate the agreement in writing and any earned portion of the fee, based upon the advisor's estimate of percentages of work completed, is due at the time of notice of termination.

IWS may also provide advice on insurance (disability, long-term care, and life) and annuity products to its clients via a relationship with insurance providers. IWS compensation is covered via the client's annual asset management fee or financial planning fee. No additional compensation is received from the insurance provider.

### **Retirement Plan Services**

Retirement Plan "Consulting" fees for company sponsored retirement plans are generally based on plan size and services rendered. Fees are determined on a case-by-case basis and typically range from 0.20% to 1.00% or an agreed upon fixed fee.

Consulting fees will be pro-rated to the end of the initial calendar quarter and will be charged each calendar quarter (in advance or arrears) thereafter based on the value of billable assets on the value of billable assets on the last day of calendar quarter. Consulting fees are either deducted from plan assets or remitted directly to IWS based on Client's election.

Clients paying in advance who terminate their contract with IWS within the first five days are entitled to a full refund. Should a client terminate the relationship with IWS outside the five-day window, the unearned portion of the consulting fee will be refunded. Clients paying in arrears will incur a pro rata charge for services rendered prior to the termination of the agreement, which means you will incur advisory fees only in proportion to the number of days in the quarter for which you are a client.

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

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IWS does not charge performance-based fees.

### **Item 7 - Types of Clients**

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Our firm works primarily with individuals and families but also serves retirement plans, foundations, endowments, and other non-profit organizations.

IWS currently requires a minimum relationship size of \$500,000 of investable assets. Exceptions to this minimum are allowed but must receive the approval of one of the principal officers of the firm.

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

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IWS' core investment philosophy is built on the foundation of portfolio diversification and the client's individual asset allocation with the proper cash, fixed income, and equity mutual funds and ETFs based on their individual risk tolerance. Our investment strategy begins with a general long-term acceptance of the Efficient Market Hypothesis, which states that the primary driver of a portfolio's risk and return characteristics is determined by asset allocation, and not security selection. We will primarily utilize a passive investment strategy but will incorporate active managers when deemed necessary. The primary vehicles recommended to IWS clients are mutual funds and exchange-traded funds.

IWS believes that an accurate prediction can never be made about which asset classes will outperform going forward, we take a disciplined approach by allocating to many different asset classes, and then using rebalancing to bring the portfolio back into alignment not only in terms of the mix among cash, fixed income, and equity mutual funds and ETFs, but also keeping the proper style balance between large cap and small cap equity, growth versus value, etc.

And, as with any stock-based investment, mutual funds, including index mutual funds, carry the risk of losses. While we can reduce company-specific risk through diversification, eliminate manager-risk with passive portfolios and reduce overall portfolio volatility with a broad mix of equity mutual funds and ETFs, fixed income, and other assets, we cannot eliminate the risk of fluctuation that comes with investing in stocks and bonds. It is always possible in any given week, month, or year that an investor's portfolio value could be less than the previous period. For the client that chooses to have a portfolio more heavily weighted in stock investments versus bond investments, he/she needs to be prepared for a potential drop in the value of the portfolio of more than 20% during extremely volatile market conditions. The Efficient Market Hypothesis dictates that it is this *market risk* that offers investors potential long-term rewards, so we aim to reduce other previously mentioned risks wherever possible.

### **Risks of Specific Securities Used**

We do not primarily recommend one particular type of security over another since each client has different needs and a different tolerance for risk. Each type of security has its own unique set of risks associated with it and even within the same type of investment, risks can vary widely. However, in very general terms, the higher the anticipated return of an investment, the higher the risk of loss associated with the investment. A description of the types of securities we may recommend to you and some of their inherent risks are provided below.

*Mutual Funds:* Investments in mutual funds generally involve the same risks as investing in underlying equity or fixed income securities. Nearly all mutual funds and closed-end funds have expenses that reduce net-of-fee investment returns. Mutual funds carry the risk of rapid redemptions and forced selling. Closed-end funds carry liquidity risk. Mutual fund prices may vary significantly from the Net Asset Value due to market conditions.

*Exchange Traded Funds:* Investing in an exchange traded fund ("ETF") often involves the same risks as investing in the underlying securities the ETF is tracking. ETF prices may vary significantly from the Net Asset Value due to market conditions.

*Buffer Funds:* IWS may recommend Buffer Mutual Funds and/or Buffer ETFs to clients when suitable. Buffer funds seek to provide investors with the upside of an asset's returns (generally up to a capped percentage) while also providing downside protection on the first predetermined percentage of losses. Buffer funds are designed to safeguard against market downturns by employing complex options strategies. If the market performs well and exceeds the buffer, the buffer fund will not enjoy gains beyond a certain point. If the market experiences losses beyond the buffer, the buffer fund is exposed to open-ended losses. As buffer funds own options, they do not receive dividends from their equity holdings. We encourage clients to carefully read the relevant prospectus to fully understand the cost structures, risks, and features of these complex products.

*Bonds:* Corporate debt securities (or "bonds") are typically safer investments than equity securities, but their risk can also vary widely based on the financial health of the issuer; the risk that the issuer might default; when the



bond is set to mature; and, whether or not the bond can be "called" prior to maturity. When a bond is called, it may not be possible to replace it with a bond of equal character paying the same rate of return.

*Stocks:* There are numerous ways of measuring the risk of equity securities (also known simply as "equities" or "stock"). In very broad terms, the value of a stock depends on the financial health of the company issuing it. However, stock prices can be affected by many other factors including, but not limited to the class of stock (for example, preferred or common); the health of the market sector of the issuing company; and the overall health of the economy. In general, larger, better-established companies ("large cap") tend to be safer than smaller start-up companies ("small cap") are but the mere size of an issuer is not, by itself, an indicator of the safety of the investment.

### **Item 9 - Disciplinary Information**

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Neither Clint Thomas nor Justina Welch nor any employees of IWS have ever been convicted of, pled guilty or no contest to any felony or misdemeanor in a criminal or civil action in any foreign or domestic court. Neither Clint Thomas nor Justina Welch nor any employees of IWS have ever been part of a proceeding before the SEC or any other industry regulatory agency. Neither Clint Thomas or Justina Welch nor any employees of IWS have ever been part of a self-regulatory organization's proceeding.

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

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Neither Clint Thomas or Justina Welch nor any employees of IWS are registered or applying to register as a custodian or a registered representative of a custodian, nor a futures commission merchant, commodity pool operator, commodity trading advisor.

Neither Clint Thomas or Justina Welch nor any employee of IWS has a relationship with a broker dealer, municipal securities dealer, government securities dealer or broker, investment company, outside investment adviser, banking or thrift institution, accounting firm, law firm, insurance agency, pension consultant, real estate broker, sponsor, or syndicator of limited partnerships.

IWS receives no compensation from outside investment advisers and receives no compensation other than the asset management or financial planning fee paid by the firm's clients.

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

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As a Registered Investment Adviser, IWS has a fiduciary duty to its clients. In the simplest of terms this means that our first obligation is to put the client's needs above all other interests or conflicts. IWS takes our fiduciary duty very seriously and has built our business model around our obligation to minimize conflicts of interest with our clients and to truly make recommendations that are in their best interests.

IWS' owner and employees will adhere to all federal and state securities laws and regulations. All IWS related persons will be held to the highest standard of conduct and shall not withhold pertinent information from clients

regarding securities recommendations, act to deceive or defraud any client or outside party, or otherwise partake in any activity with the intent to deceive or defraud any regulatory body, government office or client.

IWS' owners and employees may buy or sell securities for themselves, which are also recommended to clients, which represents a conflict of interest. To avoid conflicts of interest, IWS monitors and supervises the personal securities transactions of all employees and its owners. Monitoring is conducted by Justina Welch, Chief Compliance Officer of IWS. IWS retains records of all securities transactions conducted by employees and owners. For compliance purposes with regulations, all employees and the owner are considered "access persons" whose transactions will be monitored.

As a matter of principle IWS' owner and employees are to withhold public comment regarding advice on individual securities, as to avoid conflicts of interest when these comments may enrich the IWS associated person.

## **Item 12 - Brokerage Practices**

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### **Selection and Recommendation of Broker-dealers**

IWS has a duty to select brokers dealers that provide best execution for clients. The duty of best execution requires an investment adviser to seek to execute securities transactions for clients in such a manner that the client's total cost or proceeds in each transaction is the most favorable under the circumstances. The lowest possible commission, while very important, is not the only consideration. Factors IWS may take into consideration include: quality and promptness of overall execution services provided by the custodian; competitiveness of transaction fees charged by the custodian; quality and accuracy of statements; availability of investment research and tools; efficiency; and reputation. IWS typically recommends the implementation of any investment recommendation be completed through Charles Schwab & Co., Inc. ("Schwab"), member FINRA/SIPC.

IWS evaluates the execution and performance of the broker-dealers it uses at least annually. IWS can elect to change its broker/dealer at any time should it feel that Schwab is not providing an adequate level of service for the associated costs.

### **Research and other soft dollar benefits**

IWS does not have any formal soft dollar arrangements. However, as a registered investment adviser, we have access to the institutional platform of your account custodian. As such, we will also have access to research products and services from your account custodian. These products may include research reports, financial publications, information about particular companies and industries, and other products or services that provide lawful and appropriate assistance to our firm in the performance of our investment decision-making responsibilities. Schwab also makes available software and other technology that provides access to client account data (such as trade confirmations and account statements); facilitates trade execution; facilitates payment of our fees from our clients' accounts; and assists with back-office functions, recordkeeping, and client reporting. Such research products and services are provided to all investment advisers that utilize the institutional services platform of Schwab and are not considered to be paid for with soft dollars. The availability of these services from Schwab benefits us because we do not have to produce or purchase them. This creates a conflict of interest, since we have an incentive to request the use of Schwab, rather than making such a decision based exclusively on your interest in receiving the

best value in custody services and the most favorable execution of your transactions. We believe, however, that taken in the aggregate, our selection of Schwab as custodian and broker is in the best interests of our clients. Our selection is primarily supported by the scope, quality, and price of Schwab's services, and not the services that benefit only us.

#### **Brokerage for client referrals**

IWS does not receive client referrals from any custodians.

#### **Directed Brokerage**

IWS will generally require clients to direct the Firm to execute transactions through a specified broker-dealer. Not all investment advisers require their clients to direct brokerage.

#### **Order Aggregation**

We manage individual portfolios and not "model" portfolios. However, we may aggregate ETF trades in order to obtain the best execution. If IWS decides to purchase or sell the same security for several clients at approximately the same time, allocations are made in an equitable fashion, typically on a pro rata basis.

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

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Clint Thomas and Justina Welch, Owners of IWS, review each client's portfolio no less frequently than once per quarter. At the end of each quarter IWS generates an updated Asset Allocation analysis and trailing period performance report for all investment management clients. The Asset Allocation report is then compared to the client's signed Investment Policy Statement to analyze the variance from the target portfolio allocation. Additionally, performance is compared to broad market averages to ensure that the client is capturing as much of the long-term return of the market as possible. Clients will also receive monthly statements from their custodian (i.e., Schwab). Accounts are also reviewed during an annual portfolio review meeting with the firm's clients to ensure that the advisory services provided to you and/or the portfolio mix are consistent with your current investment needs and objectives.

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

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IWS does not compensate existing clients or other outside professionals (such as CPAs, attorneys, etc.) for client referrals. IWS also does not receive any economic benefit from someone who is not a client for providing investment advice or other advisory services to our clients.

IWS does pay to be listed as a recommended financial advisor on certain third-party websites. These websites are independent blogs and online communities that offer personal finance and investment information to their audiences. These websites have a vetting process, and firms must meet certain criteria and be approved before being listed. IWS does not receive client referrals from these websites in exchange for compensation; rather, the payment is solely for the listing.

## **Item 15 - Custody**

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IWS does not accept physical custody of client funds or securities but is deemed to have constructive custody where IWS has authorization to deduct fees from client accounts. Additionally, certain clients have signed a Standing Letter of Authorization (SLOA) that gives IWS third-party money movement authority.

For client accounts in which IWS is deemed to have custody the Firm will take the following steps:

- i. The client will provide written authorization to IWS, permitting IWS to be paid directly for the client's accounts held by the custodian.
- ii. IWS will send the client a written invoice itemizing the fee, including any formula used to calculate the fee, the date range covered by the fee and the amount of assets under management on which the fee was based.
- iii. The custodian will send at least quarterly statements to the client showing all disbursements for the account, including the amount of the advisory fee.

Clients should receive at least quarterly statements from the custodian that holds and maintains client's investment assets. Clients of IWS are encouraged to carefully review such statements and compare official custodial records to the account reports and invoices that IWS may provide to the client and notify IWS of any discrepancies. IWS reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain strategies.

## **Item 16 - Investment Discretion**

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As outlined in our Asset Management Agreement, IWS requires discretionary authority over clients' investment portfolio under our management, including the type of security and number of shares. Having discretion over mutual fund and ETF trades allows us to be more flexible for those clients who prefer not to discuss each trade with us.

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

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IWS does not proxy vote for our clients' investment positions. Clients will receive proxy solicitations directly from the custodian. We are happy to discuss these solicitations with our clients.

Further, we will have no power, authority, responsibility, or obligation to take any action with regard to any claim or potential claim in any bankruptcy proceeding, class action securities litigation or other litigation or proceeding relating to securities held at any time in a client account, including without limitation, to file proofs of claim or other documents related to such proceeding, or to investigate, initiate, supervise, or monitor class action or other litigation involving client assets.

## **Item 18 - Financial Information**

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IWS does not require the prepayment of more than \$1,200 in fees six months or more in advance. IWS has no outstanding liabilities or financial impairments that would inhibit our ability to provide promised services to clients. No owner or employee of IWS has ever filed for bankruptcy.

**Part 2B of Form ADV Brochure Supplement for:**

**Clint Thomas**

Integrity Wealth Solutions LLC  
4725 S. Monaco Street, Suite 335  
Denver, CO 80237  
Phone: 303.716.5777  
clint@integrity-wealth.com

March 4, 2025

This brochure supplement provides information about Clint Thomas that supplements the Integrity Wealth Solutions Part 2A of form ADV Firm Brochure. You should have received a copy of that brochure, if you did not or have questions on the brochure, please contact us at 303.716.5777 and a copy will be provided to you.

Additional information about Clint is available at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by a unique identifying number, known as a CRD number. The CRD number for Clint Thomas is 4310393.

## Educational Background and Business Experience

**Name:** Clint Thomas

**DOB:** 10/27/1975

### Education and Training

Bachelor of Business Administration, Lubbock Christian University, 1998

Master of Science in Finance, University of Denver, 2003

Certified Financial Planner (CFP®), 2007

### CERTIFIED FINANCIAL PLANNER™ (CFP®)

I am certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). Therefore, I may refer to myself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and I may use these and CFP Board's other certification marks (the "CFP Board Certification Marks"). CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold CFP® certification. You may find more information about CFP® certification at [www.cfp.net](http://www.cfp.net).

CFP® professionals have met CFP Board's high standards for education, examination, experience, and ethics. To become a CFP® professional, an individual must fulfill the following requirements:

- **Education** – Earn a bachelor's degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirements through other qualifying credentials.
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual's ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.
- **Experience** – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
- **Ethics** – Satisfy the *Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement* and agree to be bound by CFP Board's *Code of Ethics and Standards of Conduct ("Code and Standards")*, which sets forth the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements to remain certified and maintain the right to continue to use the CFP Board Certification Marks:

- **Ethics** – Commit to complying with CFP Board's *Code and Standards*. This includes a commitment to CFP Board, as part of the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial advice and financial planning. CFP Board may sanction a CFP® professional who does not abide by this commitment, but CFP Board does not guarantee a CFP® professional's services. A client who seeks a similar commitment should obtain a written engagement that includes a fiduciary obligation to the client.
- **Continuing Education** – Complete 30 hours of continuing education hours every two years to

maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the *Code and Standards*.

### **Business Background**

From August 2016 to present, Clint is a Principal and Co-Owner of Integrity Wealth Solutions.

From 2003 to 2016, Clint was a Financial Consultant with M.J. Smith and Associates.

From 2000 to 2002, Clint was a Financial Representative with Merrill Lynch.

### **Disciplinary Information**

Clint Thomas has no record of any disciplinary event with the SEC, any other federal regulatory agency, state regulatory agency or foreign financial regulatory authority.

### **Other Business Activities**

Clint Thomas is not engaged in any other investment-related business and does not receive compensation in connection with any business activity outside of Integrity Wealth Solutions, LLC.

### **Additional Compensation**

Clint Thomas receives no additional compensation for any investment related services outside of the work performed for Integrity Wealth Solutions.

### **Supervision**

The individual responsible for monitoring Clint Thomas' advisory activities is Justina Welch, Co-Owner and Chief Compliance Officer of Integrity Wealth Solutions. Justina Welch is responsible for ensuring that Clint Thomas adheres to all required regulations regarding the activities of an Investment Adviser Representative, as well as all policies and procedures outlined in the firm's Code of Ethics and compliance manual. Justina Welch may be reached at 303.716.5777

**Part 2B of Form ADV Brochure Supplement for:**

**Justina Welch**

Integrity Wealth Solutions  
4725 S. Monaco Street, Suite 335  
Denver, CO 80237  
Phone: 303.716.5777  
justina@integrity-wealth.com

March 4, 2025

This brochure supplement provides information about Justina Welch that supplements the Integrity Wealth Solutions Part 2A of form ADV Firm Brochure. You should have received a copy of that brochure, if you did not or have questions on the brochure, please contact us at 303.716.5777 and a copy will be provided to you.

Additional information about Justina is available at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by a unique identifying number, known as a CRD number. The CRD number for Justina Welch is 3276656.



## Educational Background and Business Experience

**Name:** Justina Welch

**DOB:** 2/3/1976

### Education and Training

Bachelor of Science, Business Administration, Finance - University of Colorado, 1998

Master of Business Administration, Corporate Financial Management - University of Colorado, 2010

Certified Financial Planner (CFP®), 2013

### CERTIFIED FINANCIAL PLANNER™ (CFP®)

I am certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). Therefore, I may refer to myself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and I may use these and CFP Board's other certification marks (the "CFP Board Certification Marks"). CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold CFP® certification. You may find more information about CFP® certification at [www.cfp.net](http://www.cfp.net).

CFP® professionals have met CFP Board's high standards for education, examination, experience, and ethics. To become a CFP® professional, an individual must fulfill the following requirements:

- **Education** – Earn a bachelor's degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirement through other qualifying credentials.
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual's ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.
- **Experience** – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
- **Ethics** – Satisfy the *Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement* and agree to be bound by CFP Board's *Code of Ethics and Standards of Conduct ("Code and Standards")*, which sets forth the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements to remain certified and maintain the right to continue to use the CFP Board Certification Marks:

- **Ethics** – Commit to complying with CFP Board's *Code and Standards*. This includes a commitment to CFP Board, as part of the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial advice and financial planning. CFP Board may sanction a CFP® professional who does not abide by this commitment, but CFP Board does not guarantee a CFP® professional's services. A client who seeks a similar commitment should obtain a written engagement

that includes a fiduciary obligation to the client.

- **Continuing Education** – Complete 30 hours of continuing education hours every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the *Code and Standards*.

### **Business Background**

From August 2016 to present, Justina is a Principal and Co-Owner of Integrity Wealth Solutions

From 2012 to July 2016, Justina was a Financial Consultant with M.J. Smith & Associates.

From 2011 to 2012, Justina was an Investment Counselor with Fisher Investments.

From 1996 to 2011, Justina was the Vice President of Hofgard & Co, Inc. and Hofgard Insurance, a financial services consulting firm.

### **Disciplinary Information**

Justina Welch has no record of any disciplinary event with the SEC, any other federal regulatory agency, state regulatory agency or foreign financial regulatory authority.

### **Other Business Activities**

Justina Welch is not engaged in any other investment-related business and does not receive compensation in connection with any business activity outside of Integrity Wealth Solutions, LLC.

### **Additional Compensation**

Justina Welch receives no additional compensation for any investment related services outside of the work performed for Integrity Wealth Solutions.

### **Supervision**

As Chief Compliance Officer, Justina Welch is responsible for supervising all activities of the Firm. Justina Welch adheres to and is bound by all firm policies and procedures outlined in the firm's Code of Ethics and Compliance Manual. Justina Welch may be reached at 303.716.5777.