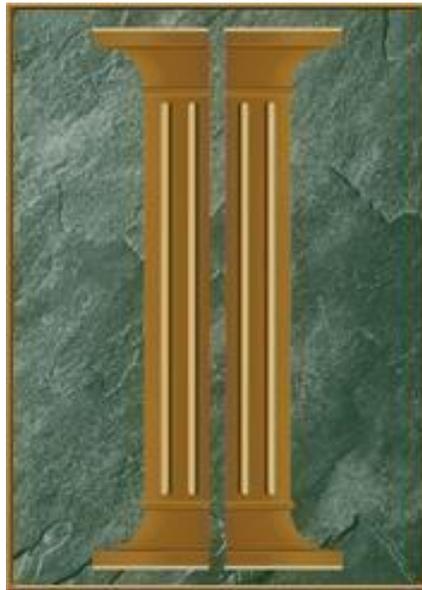


**Item 1. – Cover Page**

**Form ADV, Part 2A**

**Disclosure Brochure of  
Integrity Investors, LLC  
4339 Butler Hill Road, Suite 200  
St. Louis, MO 63128  
(314) 212-1404  
[www.integrityinvestors.com](http://www.integrityinvestors.com)**



**Dated: September 8, 2020**

This brochure provides information about the qualifications and business practices of Integrity Investors, LLC. If you have any questions about the contents of this brochure, please contact us at (314) 212-1404 and [mark@integrityinvestors.com](mailto:mark@integrityinvestors.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority. Registration with the SEC or any state securities authority does not imply a certain level of skill or training.

Additional information about Integrity Investors, LLC also is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Item 2 - Material Changes**

### **Annual Update**

The Material Changes section of this brochure will be updated annually or when material changes occur since the previous release of the Firm Brochure.

### **Material Changes since the Last Update**

Since the last ADV Annual Update Amendment dated March 5, 2020, the Firm has had the following material changes:

- In August 2020, the Firm moved its principal office and place of business address to: 4339 Butler Hill Road, Suite 200, St. Louis, MO 63128.
- In September 2020, the Firm obtained a satellite office at: 1360 S. 5<sup>th</sup> Street, Suite 105, St. Charles, MO 63301. This office is available for representatives of the Firm to meet with clients as a convenience.

### **Full Brochure Available**

Each year we will deliver to you, by no later than April 30<sup>th</sup>, a free updated brochure that includes or is accompanied by a summary of material changes; or a summary of material changes and an offer to provide a copy of the updated brochure and how to obtain it.

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: (314) 212-1404 or at [mark@integrityinvestors.com](mailto:mark@integrityinvestors.com).

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## **Item 4 - Advisory Business**

### *Firm Description*

Integrity Investors, L.L.C. (“Integrity Investors”) is a state-registered investment adviser with its principal office and place of business located in Missouri. Our mission is to provide our clients with personalized financial guidance, and the products and services needed to compliment and realize their financial potential. Integrity Investors has been operating as an investment advisory firm since 2001.

### *Principal Owners*

Integrity Investors principal owner is Mark A. Minnella.

### *Types of Advisory Services*

Integrity Investors provides continuous investment supervisory services, furnishes investment advice through consultations, and at times, may furnish advice to clients on matters not involving securities. These services include financial planning, portfolio management for individuals and small businesses. Integrity Investors also provides clients of other investment advisers such as G.A. Repple & Company with biblically based investment screening and portfolio management services. Integrity Investors may be engaged by an investment adviser for management of all or a portion of their client’s assets for biblically based investing.

From time to time, Integrity Investors may be asked to evaluate clients’ existing or potential investments in real estate, various limited partnerships, real estate partnerships, private placements and real estate investment trusts (REITs). Integrity Investors also may evaluate clients’ investments in insurance products, such as annuities.

Integrity Investors offers two types of investment advisory services:

### **ASSET MANAGEMENT**

Integrity Investors will design a customized client asset allocation strategy that is consistent with the client’s investment objectives and risk tolerance. Portfolio development starts with an interview and confidential assessment to help identify an investment strategy that aligns with each client’s individual goals, values and personal peace quotient. An individual’s established time frame before they will need the use of the assets in their portfolio is a primary indicator used to calculate the maximum exposure tolerances for asset classes and minimum thresholds for cash needs. We also believe an investor’s emotional connection with short-term market activity is as valid as any other determinate in portfolio design.

Integrity Investors will transition the client from his or her current allocation to the recommended asset allocation strategy and thereafter, on an ongoing basis, will monitor the performance of a client’s portfolio and suggest rebalancing as necessary to conform to the recommended allocations. Integrity Investors believes an investment strategy should help clients reach their desired future goal and provide confidence today. Integrity Investors will strive to understand the client, their needs, and peace quotient, then fit an investment strategy to the uniqueness of your life.

Clients typically grant Integrity Investors discretionary authority to determine the types of investments and the number, amount and timing of securities purchased or sold for their account.

Integrity Investors is committed to recommending investments that do not actively contribute to the moral decline of our society. All Investment opportunities are screened for Christian values and only those investments that do not promote abortion, pornography, anti-family entertainment, non-married lifestyles, alcohol, tobacco or gambling are recommended.

Integrity Investors acknowledges that under the Employment Retirement Income Security Act (ERISA) of 1974, as amended, that it is a "fiduciary" when the firm's services are subject to the provisions of ERISA.

### *Assets Under Management*

Integrity Investors provides investment advice to clients on a discretionary basis, and as of December 31, 2019, had assets under management of \$33,547,521.

### **FINANCIAL PLANNING SERVICES**

Integrity Investors provides professional financial planning service to its clients. The term "financial planning" refers to formulating the client's financial goals into an understandable report so that the client may then determine which direction he or she will take to best utilize available financial resources. Integrity Investors will review the client's financial condition, and suggest planning concepts designed to reduce taxes, protect against interruption of earning capabilities, as well as premature death and investment advice as to methods of obtaining or increasing financial independence. Recommendations made in a financial plan are solely up to the client to implement.

### *Termination of Advisory Agreement*

A client may terminate his or her Advisory Agreement without penalty or fee within five (5) business days after signing the Agreement. An Advisory Agreement also may be terminated by either the client or Integrity Investors upon ten (10) days' prior written notice. Clients who terminate their Agreement will only be charged for a pro-rated portion of the month before termination and will receive a refund of any advisory fees paid but not earned.

### **Item 5 - Fees and Compensation**

#### **ASSET MANAGEMENT SERVICE FEE:**

Integrity Investors charges its clients up to 2.00% of the market value of the assets under management on an annual basis as the fee for asset management services. Fees are negotiable and may be reduced or waived in certain circumstances. Upon termination, any unearned fees collected in advance will be promptly returned to the client. Fees are billed monthly in arrears, calculated using the average daily balance of Client's assets under management by Advisor for the prior calendar month. The client authorizes Integrity Investors to debit its fee from the client's account in the advisory agreement.

Integrity Investors will not be compensated on the basis of a share of capital gains or upon capital appreciation of the funds of the client. The asset management fee does not include custodial fees, transaction costs or other expenses charged by the client's custodian or broker-dealer. Each mutual fund in which the client's assets may be invested charges its own advisory fee and other expenses as described in the fund's prospectus.

#### **FINANCIAL PLANNING SERVICE FEE**

Clients may elect one of the following options:

**A. HOURLY FEES     \$140.00 per hour**

Hourly fees will be invoiced, in arrears, monthly based upon the number of hours billed that month. Fees include preparation and travel time.

**B. NEGOTIATED PROJECT FEE**

Negotiated fees range from \$500-\$5,000 depending upon the size of the estate and the complexity of the financial plan. A negotiated fee for a financial planning project will be billed upon completion of client's financial plan. Fees include preparation and travel time incurred in the engagement that are approved by the client. After Integrity Investors completes a client's initial financial plan, all subsequent financial planning sessions requested by the client will be billed at the hourly rate set forth above.

#### *Fee Billing*

Clients typically grant Integrity Investors authority to receive monthly payments directly from the client's account held by the independent custodian. The custodian will send to the client a statement, at least quarterly, indicating all the amounts disbursed from the account, including the amount of advisory fees paid directly to Integrity Investors. Clients are urged to verify the fee by comparing the account statements sent from the custodian with the Firm's quarterly reports.

#### *Other Fees and Expenses*

Integrity Investors' fees do not include custodial fees or brokerage commissions or other transaction costs, if any, charged by client's custodian and broker. Mutual funds in which client's assets may be invested charge additional advisory fees and other fees and expenses, as described in the applicable fund's prospectus.

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

Integrity Investors does not charge any performance-based fees.

## **Item 7 -Types of Clients and Minimum Requirements**

Integrity Investors generally provides investment advice to individuals, high net worth individuals, pension and profit-sharing plans, trusts, estates, charitable organizations, corporations and other business entities.

Integrity Investors has certain minimum thresholds that have been established to allow Integrity Investors to provide the high level of personal services and attention which we believe our clients deserve. For Asset Management clients, Integrity Investors' minimum account size is \$100,000, unless waived or reduced in Integrity Investors' discretion.

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

### *Methods of Analysis*

Integrity Investors methods of security analysis are primarily fundamental and technical and secondarily, cyclical, based upon sources of information from research materials, corporate rating services, financial newspapers and magazines, annual reports, prospectuses, filings with the SEC and company press releases.

Integrity Investors believes successful investing depends on the type of investments, (such as stocks, bonds, etc.), when invested, and the duration of the investment. Holding an investment too long, or not long enough, can make the difference between a handsome gain and an ugly loss.

Analysis begins by analyzing the broad stock market to determine whether offense or defense is the proper disposition. Then asset class and sector indicators are used to determine which sectors and assets classes have favored status. Finally, possible investments are analyzed to determine which have the strongest technical attributes including positive momentum, relative strength, and positive trend. Once a security has been selected for inclusion into the portfolio, it is continuously monitored for changes in both the company's and the markets' technical strength

Integrity Investors believe the use of technical and fundamental analysis in the development and management of your portfolio gives you the benefit of the best of both worlds. Fundamental analysis is used to identify the strength of a possible investment. It tells us WHAT to buy. Technical analysis is used to identifying buy and sells opportunities. It tells us WHEN to execute.

In all investment selection, Integrity Investors will actively screen to minimize a portfolios exposure to investments that profit from or promote activities that are contrary to Christian values.

When using fundamental analysis, we generally rely on, among other things, company earnings, balance sheet variables and management quality which are used to determine the value of an investment. The data we review is generally considered reliable, but we cannot guarantee, nor have we verified its accuracy.

In addition, the data that we review is sometimes subjective in nature and open to interpretation. Even if our data and interpretation of the data is correct, there may be other factors that determine the value of securities other than those considered in fundamental analysis.

When using technical analysis, we review statistics to determine relative strength, momentum and trends in security prices and make our investment decisions based on the information compiled. This analysis does not try to predict how an investment will perform but help us understand the current risk and possible reward of the investment. In addition, this analysis does not take into account, the more fundamental properties of what an investment may be worth such as company performance and balance sheet variables which may play a part in determining the value of an investment.

### *Principal Investment Strategies*

Integrity Investors generally recommends the purchase of individual stocks and it also recommends mutual funds to its clients. The securities portfolios of mutual funds are managed by the fund's investment advisor and not by Integrity Investors. With respect to the purchase or sale of securities, Integrity Investors relies upon dynamic asset allocation models to determine the appropriate portion of a client's assets to be invested in a certain asset class (i.e., equity or fixed income) at any given time.

### *Principal Investment Risks*

***Investing in securities involves risk of loss that clients should be prepared to bear.*** Risk refers to the possibility that you will lose money (both principal and any earnings) or fail to make money on an investment. Integrity Investors cannot guarantee that it will achieve a client's investment objective. Below are some of the more specific risks of investments which Integrity Investors may recommend to clients:

**Equity Risk.** Equity securities tend to be more volatile than other investment choices. The value of an individual company's securities can be more volatile than the market as a whole. This volatility affects the value of the client's overall portfolio. Small- and mid-cap companies are subject to additional risks. Smaller companies may experience greater volatility, higher failure rates, more limited markets, product lines, financial resources, and less management experience than larger companies. Smaller companies may also have a lower trading volume, which may disproportionately affect their market price, tending to make them fall more in response to selling pressure than is the case with larger companies.

**Investment Companies Risk.** When a client invests in open end mutual funds or ETFs, the client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the client will incur higher expenses, many of which may be duplicative. In addition, the client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives). ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value; (ii) the ETF may employ an investment strategy that utilizes high leverage ratios; or (iii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit

breakers” (which are tied to large decreases in stock prices) halts stock trading generally. CD has no control over the risks taken by the underlying funds in which clients invest.

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

Integrity Investors has no material legal or disciplinary events to report.

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

Mark Minnella, Marita LaChapell, Jason Kreke, and Richard Wolfe are licensed insurance producers and sell insurance products and services through Mark Minnella, Inc. a licensed business entity producer. From time to time, in this capacity they may offer clients of Integrity Investors insurance products and/or services. In this capacity, they may receive compensation from the sale of an insurance product in addition to the advisory fee paid by the client to Integrity Investors. Clients are always free to purchase insurance products through someone else.

Marita LaChapell is President and Owner of ALIGN Financial, LLC. ALIGN Financial is a CPA firm providing business consulting and coaching services. She provides tax preparation and tax advisory services and may provide these services to advisory clients. To the extent that advisory clients purchase any of the above services through ALIGN Financial, they will be charged an agreed upon fee for such services, separate and apart from the advisory relationship or fee charges by Integrity Investors for advisory services.

At times, Integrity Investors may provide investment management services to the accounts of clients of G.A. Repple & Company and other investment advisers for purposes of providing biblically based investing.

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

#### *Code of Ethics*

The firm has adopted a Code of Ethics which is based on the principle that Integrity Investors and its employees owe a fiduciary duty to clients. In complying with this duty, advisory personnel must avoid activities or interests that might interfere with making decisions in the best interests of clients. Each person subject to the Code of Ethics is required to report all violations of which such person becomes aware. Integrity Investors will provide a copy of its Code of Ethics, free of charge, upon the written or oral request of any client or prospective client.

#### *Personal Trading*

From time to time, Integrity Investors’ representatives may purchase securities for their personal accounts that they also recommend to clients. In such cases, Integrity Investors’ representatives will not affect transactions for their personal accounts which will be contrary to recommendations being made to clients. Further, Integrity Investors’ representatives will not compete with clients in connection with

such transactions. Integrity Investors has adopted an Insider Trading Policy that prohibits its representatives from trading on non-public information.

## **Item 12 - Brokerage Practices**

### *Recommending Brokerage Firms*

Integrity Investors will assist Asset Management clients who have selected an asset management program in opening a custodial/brokerage account.

Integrity Investors utilizes Equity Advisor Solutions / Equity Trust to serve as custodian of their clients' assets and to execute their securities transactions. Integrity Investors recommends Equity Advisor Solutions based on its transaction fees, best execution capabilities and financial stability. While Integrity Investors believes the commissions or rates established by Equity Advisor Solutions to be competitive, transactions may not always be executed at the lowest available rate.

If a client directs the use of a broker/dealer other than through Equity Advisor Solutions, client's independent broker-dealer will determine the commission rate or fee schedule to apply in connection with the brokerage transactions. Each client that directs the use of a broker/dealer other than Equity Advisor Solutions should understand that the client will lose (i) the possible advantage that Integrity Investors' other clients derive from aggregation of orders for several clients as a single transaction for the purchase or sale of a security and (ii) the ability of Integrity Investors to effectively negotiate reduced commission rates. Trades effected other than through Equity Advisor Solutions are normally effected after the trades of clients that have selected Equity Advisor Solutions, primarily due to delays in communicating the orders to the appropriate broker/dealers.

### *Best Execution*

As a fiduciary, with respect to transactions it implements on behalf of its advisory clients, the Adviser has an obligation to obtain best execution of under the circumstances of the particular transaction. The Adviser seeks to execute client transactions in such a manner that the client's total cost or proceeds in each transaction is the most favorable under the circumstances.

### *Soft Dollars*

Integrity Investors may receive so-called "soft dollar arrangements" wherein Integrity Investors directs client commissions to a broker-dealer that provides research and brokerage services to Integrity Investors. The firm's custodian provides software reporting to the firm. The receipt of this benefit is not a material conflict of interest and falls within the safe harbor provision for soft dollars under the Advisers' Act.

### *Order Aggregation*

Integrity Investors frequently follows the practice of bunching orders for various clients, which typically results in better execution of those orders. In certain cases, where the aggregate order is executed in a series of transactions at various prices on a given day, each participating client's proportionate share of such order reflects the average price paid or received with respect to the total order placed on that day.

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

Asset management accounts typically are reviewed at least quarterly by Mark A. Minnella, Principal of Integrity Investors, L.L.C. Financial planning accounts are reviewed annually.

Integrity Investors, L.L.C. provides quarterly reports to clients that include the present values and the values for prior quarters of the client's assets under management, the rate of return for the quarter, and current positions for all transactions. Clients also receive monthly statements from their broker-dealer/custodian detailing the transactions in the client's account.

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

#### *Incoming Referrals*

At present, Integrity Investors does not have any relationships whereby they compensate a party for referring a client to them. If Integrity Investors would compensate a party for referring a client, Integrity Investors will enter into written agreements with that individual in accordance with the requirements of the Missouri Securities Act. The individual or entity who solicits the client account will receive a portion of the total fee paid to Integrity Investors for managing the account. Integrity Investors' referral agreement is in compliance with the federal regulations as set out in 17 CFR Section 275.206(4)-3, and where state law requires, each client is given a copy of the referral agreement prior to or at the time of entering into an advisory contract.

#### *Referrals of Other Professionals*

Integrity Investors does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them. Integrity Investors will refer clients to other service professionals if requested or deemed necessary, based on the specific needs of the client. For example, Integrity Investors may refer clients to legal counsel, accountants and insurance agents. It is possible that these professionals may, in turn, make referrals of their clients seeking investment advice to Integrity Investors.

#### *Other Compensation*

Some of Integrity Investors' advisory representatives are licensed agents of various insurance companies. A client of Integrity Investors may implement his or her financial plan or other investment advice by purchasing insurance products through a representative of Integrity Investors. In the event a client chooses to implement his or her financial plan or other investment advice by making such purchases, the representative will receive economic benefits in the form of commissions paid directly to them by the applicable insurance company. The selection of the individuals and entities through which the financial plan or other investment advice is implemented is solely within the discretion of each client.

## **Item 15 - Custody**

Integrity Investors does not maintain physical custody of client assets, which are held by the independent qualified custodian selected by the client. All checks deposited into client's custodial accounts must be made payable either to the custodian or for the benefit of the account name. Integrity Investors may be deemed to have custody of client assets since it has the authority to deduct its fees from the client's custodial account. Clients will receive account statements from their custodian at least quarterly. Clients should review their account statements carefully. Clients are encouraged to compare the account statements received from their qualified custodian with any reports received from Integrity Investors.

## **Item 16 - Investment Discretion**

### *Discretionary Trading Authority*

Integrity Investors provides investment advice on a discretionary basis to clients. The client and Integrity Investors execute an investment advisory agreement wherein the client grants to Integrity Investors discretionary authority to act on the client's behalf for the limited purpose of buying, selling and trading securities and all actions necessary or incident to such activities. Clients may impose reasonable restrictions or limitations on Integrity Investors' investment discretion. Clients are contacted at least annually to determine whether there are any changes to their financial circumstances or restrictions they wish to impose.

### *Limited Power of Attorney*

Clients typically grant Integrity Investors a limited power of attorney over their brokerage account for trading purposes to determine the amount and number of securities to be bought and sold, to negotiate transaction costs on their behalf where possible and to periodically rebalance the client's account to the recommended allocation.

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

It is currently Integrity Investors' policy not to exercise proxy voting authority over client securities. Integrity Investors does not have authority to vote proxies for its clients on any matters regardless of whether Integrity Investors' investment authority is discretionary or non-discretionary. Each client retains sole and absolute authority and responsibility to vote proxies at client's own expense with respect to investments owned by the client. Clients will receive their proxies or other solicitations directly from their custodian. Clients are free to contact Integrity Investors about a particular solicitation and our office may provide them with assistance.

## **Item 18 - Financial Information**

Integrity Investors is capitalized in compliance with applicable regulations and is not aware of any financial condition that is reasonably likely to impair the fulfillment of our contractual commitments to our clients.

## Item 19 - Requirements for State Registered Advisers

This Item is not applicable as Integrity Investors nor its associated persons have any such event to disclose as to having ever been found liable or required to pay any award for an arbitration claim or other civil proceeding related to an investment related activity of \$2,500, *involving* any of the following:

- (a) an investment or an *investment-related* business or activity;
- (b) fraud, false statement(s), or omissions;
- (c) theft, embezzlement, or other wrongful taking of property;
- (d) bribery, forgery, counterfeiting, or extortion; or
- (e) dishonest, unfair, or unethical practices.

An award or otherwise being *found* liable in a civil, *self-regulatory organization*, or administrative proceeding *involving* any of the following:

- (a) an investment or an *investment-related* business or activity;
- (b) fraud, false statement(s), or omissions;
- (c) theft, embezzlement, or other wrongful taking of property;
- (d) bribery, forgery, counterfeiting, or extortion; or
- (e) dishonest, unfair, or unethical practices.

**Item 1 – Cover Page Part 2B of Form ADV: Brochure Supplement**

**Mark A. Minnella, CFS<sup>®</sup>, CFCA<sup>®</sup>, CKA<sup>®</sup>**  
**CRD# 2215742**  
**Integrity Investors, LLC**  
**4339 Butler Hill Road, Suite 200**  
**St. Louis, MO 63128**  
**(314) 212-1404**

**September 8, 2020**

This brochure supplement provides information about Mark A. Minnella that supplements the Integrity Investors, LLC brochure. You should have received a copy of that brochure. Please contact Mark Minnella at (314) 212-1404 if you did not receive Integrity Investors, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Mark Minnella is available on the SEC's website at: [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Item 2 - Educational Background and Business Experience**

Mark A. Minnella - YOB: 1955

Mr. Minnella uses certifications that are required to be explained in further detail.

### CFS®, Certified Fund Specialist

The CFS® designation program at the Institute of Business and Finance is an intermediate-to-advanced course on mutual funds, ETFs, REIT's, closed-end funds, and similar investments.

#### Qualifications and Education Requirements:

- Candidates must have a bachelors' degree or 2,000 hours of financial services work experience:
- Candidates must complete self-study program
- Pass three exams, and
- Meet continuing education requirements

### CFCA®, Christian Financial Consultant and Advisor

The CFCA® designation is a professional designation available for Christian financial consultants. Developed by the National Association of Christian Financial Consultants for their members for incorporating biblical principles into the financial planning practice.

#### Qualifications:

- Membership in the National Association of Christian Financial Consultants, self-study and a thesis

### CKA®, Certified Kingdom Advisor

The CKA® designation is issued by Kingdom Advisors, Inc. to demonstrate their knowledge and expertise in applying Biblical principles of financial planning.

#### Qualifications and Education Requirements:

- Candidates must hold a valid certification demonstrating expertise in their given field
- Candidates must meet minimum experience threshold
- Pass a qualifying examination and commit to uphold the principles in their personal lives

### Education Background

1975-1976, St. Louis Community College at Meramec, St. Louis, MO

1977-1978, Kansas State University, Manhattan, KS

1986-1987, Missouri Baptist College, St. Louis, MO

### Business Background

Managing Member/CCO, Integrity Investors, L.L.C., October 2001 to Present

Registered Principal, WFG Investments, Inc. (formerly Williams Financial Group), October 2001 to 2014

Director, The Timothy Plan Family of Funds, June 2000 to December 2003

Financial Planner, The Financial Engineering Center, Inc., 1992 to February 2001

President, Macro Logic, 1994-2014

### **Item 3 - Disciplinary Information**

Mark Minnella has never been the subject of any kind of legal or disciplinary event material to a client's evaluation of his integrity.

### **Item 4 - Other Business Activities**

Mark A. Minnella, Managing Member and CCO of Integrity Investors, is also a licensed insurance producer. To the extent that advisory clients purchase insurance products through Mr. Minnella, he may receive, through Mark Minnella, Inc., the usual and customary commissions paid with respect to those products.

Mark A. Minnella is President and Owner of Mark Minnella, Inc., a professional services firm and licensed business entity producer for insurance.

Mark A. Minnella is the Executive Director of More Than Money, Inc. (MTM). MTM is a nonprofit corporation formed as a faith-based organization dedicated to promoting financial stewardship in low-income communities through the use of education workshops and materials. He spends approximately 2-3 hours a week in this capacity.

### **Item 5 - Additional Compensation**

Mark A. Minnella, is a licensed insurance producer. To the extent that clients purchase insurance products through Mr. Minnella, he will receive the usual and customary commissions paid with respect to those products through Mark Minnella, Inc.

Mr. Minnella does not receive compensation from his other business activities with More Than Money.

### **Item 6 - Supervision**

Our investment advisory representatives and employees are required to adhere to our compliance policies and procedures in the performance of their daily activities and responsibilities to us and you. Our compliance policies and procedures include an overview of the various state statutes and regulations governing our operations and are designed to comply with applicable regulations and to facilitate the timeliness and quality of our compliance activities.

Mark Minnella is responsible for supervising all advisory activities. If you have any questions or concerns about your account, you are asked to contact Mark Minnella by calling 314-212-1404 or email to [mark@integrityinvestors.com](mailto:mark@integrityinvestors.com).

### **Item 7 - Requirements for State-Registered Advisers**

Mark A. Minnella has not been involved in any arbitration claims, self-regulatory organization or administrative proceeding, or been the subject of any bankruptcy petition.

**Item 1 – Cover Page Part 2B of Form ADV: Brochure Supplement**

**Marita L. LaChapell, CPA, PFS, CLTC<sup>®</sup>, CKA<sup>®</sup>**  
**CRD# 5468222**  
**Integrity Investors, LLC**  
**4339 Butler Hill Road, Suite 200**  
**St. Louis, MO 63128**  
**(314) 212-1404**

**September 8, 2020**

This brochure supplement provides information about Marita L. LaChapell that supplements the Integrity Investors, LLC brochure. You should have received a copy of that brochure. Please contact Mark Minnella at (314) 212-1404 if you did not receive Integrity Investors, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Marita LaChapell is available on the SEC's website at: [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Item 2 - Educational Background and Business Experience**

Marita L. LaChapell - YOB: 1959

Ms. LaChapell uses certifications that are required to be explained in further detail.

### CPA, Certified Public Accountant

The CPA credential is issued by each state, in accordance with uniform requirements established, in part, in cooperation with the American Institute of Certified Public Accountants (AICPA). This is a professional certification that demonstrates the individuals' knowledge across several topics, including Tax, Audit, Financial Reporting and Presentation, Accounting Theory and Ethics.

#### Qualifications and Education Requirements:

- Candidates must complete a 5-year degree in accounting from an accredited university
- Candidates must complete minimum experience thresholds which vary by state
- Pass a 5-part qualifying examination

### PFS®, Personal Financial Specialist

The PFS® credential is issued by the American Institute of Certified Public Accountants (AICPA) and allows CPA's to demonstrate their knowledge and expertise in personal financial planning.

#### Qualifications and Education Requirements:

- Candidates must hold a valid and active CPA license and be a member of the AICPA
- Candidates must complete a minimum of 75 hours of personal financial planning education prior to application for a PFS credential and meet minimum experience thresholds; and
- Pass a qualifying examination

### CKA®, Certified Kingdom Advisor

The CKA® designation is issued by Kingdom Advisors, Inc. to demonstrate their knowledge and expertise in applying Biblical principles of financial planning.

#### Qualifications and Education Requirements:

- Candidates must hold a valid certification demonstrating expertise in their given field
- Candidates must meet minimum experience threshold
- Pass a qualifying examination and commit to uphold the principles in their personal lives

### CLTC, Certified in Long Term Care

The CLTC designation is issued by The CLTC Board of Standards, Inc. and focuses on the discipline of extended care planning. It provides professionals the critical tools necessary to discuss the subject of longevity and its consequences on their client's family and finances.

#### Qualifications and Education Requirements:

- Candidates must hold a valid and active insurance license
- Candidates must complete specialized training; and
- Pass a qualifying examination

## Education Background

Michigan Technological University-Degree awarded - BSBA-Public Accounting  
Northern Michigan University – Coursework towards Masters in School Business Administration

## Business Background

Investment Adviser Representative, Integrity Investors, LLC, August 2018 to Present  
Insurance Producer, Mark Minnella, Inc., August 2018 to Present  
Sales Representative, Monat Market Partner, June 2018 to Present  
President & Owner, Align Financial, LLC, August 2017 to Present  
Investment Adviser Representative, Creative Financial Designs, Inc., August 2017 to August 2018  
Registered Representative, CFD Investments, Inc., August 2017 to August 2018  
Registered Representative, Thrivent Investment Management, Inc., September 2012 to June 2017  
Partner, Thrivent Financial for Lutherans, August 2012 to October 2016

## **Item 3 - Disciplinary Information**

Marita LaChapell has never been the subject of any kind of legal or disciplinary event.

## **Item 4 - Other Business Activities**

Marita LaChapell is also an insurance producer. To the extent that advisory clients purchase insurance products through Ms. LaChapell she may receive through Mark Minnella, Inc. the usual and customary commissions paid with respect to those products.

Marita LaChapell is President and Owner of ALIGN Financial, LLC. ALIGN Financial is a CPA firm providing business consulting and coaching services. She provides tax preparation and tax advisory services and may provide these services to advisory clients. To the extent that advisory clients purchase any of the above services through ALIGN Financial, they will be charged an agreed upon fee for such services, separate and apart from the advisory relationship or fee charges by Integrity Investors for advisory services.

## **Item 5 - Additional Compensation**

Marita LaChapell does not receive any additional economic benefits or compensation for providing advisory services.

## **Item 6 - Supervision**

Our investment advisory representatives and employees are required to adhere to our compliance policies and procedures in the performance of their daily activities and responsibilities to us and you. Our compliance policies and procedures include an overview of the various state statutes and regulations governing our operations and are designed to comply with applicable regulations and to facilitate the timeliness and quality of our compliance activities.

Mark Minnella is responsible for supervising all advisory activities of Ms. LaChapell. If you have any questions or concerns about your account, you are asked to contact Mark Minnella by calling 314-212-1404 or email to [mark@integrityinvestors.com](mailto:mark@integrityinvestors.com).

#### **Item 7 - Requirements for State-Registered Advisers**

Ms. LaChapell has not been involved in any arbitration claims, self-regulatory organization or administrative proceeding.

**Item 1 – Cover Page Part 2B of Form ADV: Brochure Supplement**

**Jason A. Kreke**  
**CRD# 6149663**  
**Integrity Investors, LLC**  
**4339 Butler Hill Road, Suite 200**  
**St. Louis, MO 63128**  
**(314) 212-1404**

**September 08, 2020**

This brochure supplement provides information about Jason A. Kreke that supplements the Integrity Investors, LLC brochure. You should have received a copy of that brochure. Please contact Mark Minnella at (314) 212-1404 if you did not receive Integrity Investors, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Jason Kreke is available on the SEC's website at: [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Item 2 - Educational Background and Business Experience**

Jason A. Kreke - YOB: 1978

### Education Background

Southern University Illinois, Edwardsville, IL, 08/2003 – 05/2004

### Business Background

Investment Adviser Representative, Integrity Investors, LLC, March 2019 to Present

Insurance Producer, Mark Minnella, Inc., October 2019 to Present

Registered Representative, LPL Financial, LLC, February 2018 – March 2019

Financial Advisor Trainee, Edward Jones, January 2013 – January 2018

## **Item 3 - Disciplinary Information**

Jason Kreke has never been the subject of any kind of legal or disciplinary event.

## **Item 4 - Other Business Activities**

Jason Kreke is also an insurance producer. To the extent that advisory clients purchase insurance products through Mr. Kreke, he may receive through Mark Minnella, Inc. the usual and customary commissions paid with respect to those products.

## **Item 5 - Additional Compensation**

Jason Kreke does not receive any additional economic benefits or compensation for providing advisory services.

## **Item 6 - Supervision**

Our investment advisory representatives and employees are required to adhere to our compliance policies and procedures in the performance of their daily activities and responsibilities to us and you. Our compliance policies and procedures include an overview of the various state statutes and regulations governing our operations and are designed to comply with applicable regulations and to facilitate the timeliness and quality of our compliance activities.

Mark Minnella is responsible for supervising all advisory activities of Mr. Kreke. If you have any questions or concerns about your account, you are asked to contact Mark Minnella by calling 314-212-1404 or email to [mark@integrityinvestors.com](mailto:mark@integrityinvestors.com).

## **Item 7 - Requirements for State-Registered Advisers**

Mr. Kreke has not been involved in any arbitration claims, self-regulatory organization or administrative proceeding.

**Item 1 – Cover Page Part 2B of Form ADV: Brochure Supplement**

**Richard L. Wolfe**  
**CRD# 4633741**  
**Integrity Investors, LLC**  
**4339 Butler Hill Road, Suite 200**  
**St. Louis, MO 63128**  
**(314) 212-1404**

**September 08, 2020**

This brochure supplement provides information about Richard L. Wolfe that supplements the Integrity Investors, LLC brochure. You should have received a copy of that brochure. Please contact Mark Minnella at (314) 212-1404 if you did not receive Integrity Investors, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Richard Wolfe is available on the SEC's website at: [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Item 2 - Educational Background and Business Experience**

Richard L. Wolfe - YOB: 1957

### Education Background

East Central College, Union, MO 1974 - 1977

### Business Background

Investment Adviser Representative, Integrity Investors, LLC	9/2020 to Present
Agent, Dillard & Associates d/b/a Midwest Medicare	8/2014 to Present
Owner, Agent, Wolfe Financial Solutions	7/2006 to 8/2020
Agent, CFD Investments, Inc.	1/2016 to 8/2020
Investment Adviser Representative, Creative Financial Designs, Inc.	1/2016 to 8/2020
Partner, Agent, Pathfinder Financial Advocates	7/2014 to 7/2018
Agent, O.N Equity Sales Company	7/2015 to 12/2015
Investment Adviser Representative, ON Investment Management Co	7/2015 to 12/2015
Agent, Investment Adviser Representative, OneAmerica Securities, Inc	3/2014 to 6/2015
Executive Financial Group	3/2014 to 6/2015
Agent, Western & Southern Brokerage Services, Inc.	2/2013 to 2/2014
Agent, Western & Southern Life	2/2013 to 2/2014
Agent, Investment Adviser Representative, New England Securities	4/2011 to 1/2013
Investment Adviser Representative, Aspen Financial Management	6/2009 to 5/2011

## **Item 3 - Disciplinary Information**

Richard L. Wolfe has never been the subject of any kind of legal or disciplinary event.

## **Item 4 - Other Business Activities**

Richard Wolfe is also an insurance producer. To the extent that advisory clients purchase insurance products through Mr. Wolfe, he may receive through Mark Minnella, Inc. or Midwest Medicare the usual and customary commissions paid with respect to those products.

## **Item 5 - Additional Compensation**

Richard Wolfe does not receive any additional economic benefits or compensation for providing advisory services.

## **Item 6 - Supervision**

Our investment advisory representatives and employees are required to adhere to our compliance policies and procedures in the performance of their daily activities and responsibilities to us and you. Our compliance policies

and procedures include an overview of the various state statutes and regulations governing our operations and are designed to comply with applicable regulations and to facilitate the timeliness and quality of our compliance activities.

Mark Minnella is responsible for supervising all advisory activities of Mr. Wolfe. If you have any questions or concerns about your account, you are asked to contact Mark Minnella by calling 314-212-1404 or email to [mark@integrityinvestors.com](mailto:mark@integrityinvestors.com).

#### **Item 7 - Requirements for State-Registered Advisers**

Mr. Wolfe has not been involved in any arbitration claims, self-regulatory organization or administrative proceeding.