Item 1 Cover Page

DIVERGENT FINANCIAL ADVISORY SERVICES, LLC
D.B.A DIFI ADVISORY

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29 August 2022

This brochure provides information about the qualifications and business practices of Divergent Financial Advisory Services, LLC d.b.a DiFi Advisory. If you have any questions about the contents of this brochure, please contact us at the phone number listed above. 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. Registration (e.g., "registered investment advisor") does not imply a certain level of skill or training.

Additional information about DiFi Advisory also is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Material Changes

Pursuant to Oregon and SEC rules, Divergent Financial Advisory Services, LLC d.b.a DiFi Advisory will ensure that clients receive a summary of any material changes to this and subsequent disclosure brochures within 120 days after the Firm's fiscal year end, December 31. This means that if there were any material changes over the past year, clients will receive a summary of those changes no later than April 30. At that time, DiFi Advisory will also offer a copy of its most current disclosure brochure and may also provide other ongoing disclosure information about material changes as necessary. If there are no material changes over the past year, no notices will be sent.

Clients and prospective clients can always receive the most current disclosure brochure for DiFi Advisory at any time by contacting their investment advisor representative.

This is a new brochure as of 08/29/2022

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Brochure

Brochure Supplement: Form ADV Part 2B

ITEM 4 ADVISORY BUSINESS

A. Firm Description

Divergent Financial Advisory Services, LLC d.b.a DiFi Advisory ("DIFI" or the "Firm") is an Oregon registered investment advisor. DIFI was founded on August 9th, 2021.

The Principal Owner and Chief Compliance Officer of DIFI is Alicia Itzaina.

B. Types of Advisory Services

The Firm offers a large variety of services, including portfolio management, investment analysis and financial planning for individuals and high net worth individuals. The Firm offers these services to clients or potential clients ("clients").

Investment Advisory Services:
DIFI offers discretionary and non-discretionary asset management services to advisory clients. DIFI will offer clients ongoing asset management services through determining individual investment goals, time horizons, objectives, and risk tolerance. Investment strategies, selection, asset allocation, portfolio monitoring and the overall investment program will be based on the above factors.

<u>Discretionary</u>

When the client provides DIFI discretionary authority the client will sign a limited trading authorization or equivalent. Accordingly, DIFI will be authorized to perform various functions without further approval from the client, such as the determination of securities to be purchased or sold without prior permission from the client for each transaction. Any and all trades are made in the best interest of the client as part of DIFI' fiduciary duty. However, risk is inherent to any investing strategy and model. Therefore, DIFI does not guarantee any results or returns.

<u>Non-Discretionary</u>

When the client uses DIFI on a non-discretionary basis, DIFI will determine the securities, and the amount, to be bought or sold. However, DIFI will obtain prior approval from the client on every transaction before executing any transaction.

Prior to engaging DIFI to provide any investment advisory services, DIFI requires a written Investment Advisory Agreement ("IAA") signed by the client prior to the engagement of any services. The IAA will outline services to which the client is entitled and fees the client will incur.

DIFI is an asset-based fee investment management firm. DIFI does not receive commissions for purchasing or selling stocks, bonds, mutual funds, real estate investment trusts, or other commissioned products for clients. DIFI is not affiliated with entities that sell financial products or securities. No commissions in any form are accepted.

Financial Planning Services

DIFI provides a variety of standalone financial planning and consulting services to clients for the management of financial resources based upon an analysis of current situation, goals, and objectives. Financial planning services will typically involve preparing a financial plan or rendering a financial consultation for clients based on the client's financial goals and objectives. This planning or consulting may encompass Investment Planning, Retirement Planning, Estate Planning, Charitable Planning, Education Planning, Corporate and Personal Tax Planning, Real Estate Analysis, Mortgage/Debt Analysis, Insurance Analysis, or Business and Personal Financial Planning. Written financial plans or financial consultations rendered to clients usually include general recommendations for a course of activity or specific actions to be taken by the clients. Implementation of the recommendations will be at the discretion of the client. DIFI provides financial planning clients with a written financial plan. Financial consultations are not typically accompanied by a written summary of observations and recommendations, as the process is less formal than the planning service. Assuming that all the information and documents requested from the client are provided promptly, plans or consultations are typically completed within 6 months of the client signing a contract with DIFI.

C. Services Tailored to Clients' Needs

Services are provided based on a client's specific needs within the scope of the services provided as discussed above. A review of the information provided by the client regarding the client's current financial situation, goals, and risk tolerances will be performed and advice will be provided that is in line with available information.

D. Wrap Fee Program

DIFI does not offer a Wrap Fee Program.

E. Assets Under Management

As of November 18, 2021, DIFI has the following assets under management:

Discretionary assets:	$0
Non-discretionary assets:	$0

ITEM 5 FEES AND COMPENSATION

In addition to the information provided in the Advisory Business section, this section provides details regarding Firm services along with descriptions of each service's fees and compensation arrangements.

A. Advisory Services Compensation Description:

DIFI bases its fees on a percentage of assets under management per annum.

Fees for individually managed accounts are tier priced as follows:

Account Size	*Fee (Annual percentage) **
• $0 to $500,000	1.50%
• $500,001 - $1,000,000	1.35%
• $1,000,001 - $2,500,000	1.00%
• $2,500,001 - $5,000,000	0.85%
• $5,000,001 - No Maximum	0.70%

The management fee will be based on the average daily balance for the preceding month as reported by the custodian. All asset-based fees are deducted by the qualified custodian of record on a monthly basis in arrears, or as otherwise indicated in the client agreement.

For example, a client that has $300,000.00 average daily balance for the preceding month of assets under management with DIFI will be charged 0.125% (1.50%÷12) at the end of the last business date of the month, while a client that has $600,000.00 average daily balance for the preceding month of assets under management with DIFI will be charged 0.1125% (1.35%÷12) at the end of the last business date of the month.

For the initial period of an engagement, the fee is calculated on a pro rata basis. In the event the agreement is terminated, the fee for the final billing period is prorated through the effective date of the termination and the unearned portion of the fee is charged to the client, as appropriate.

DIFI, in its sole discretion, may charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, types of assets, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, etc.).

THIRD PARTY/ CUSTODIAN FEES

In addition to the advisory fees paid to DIFI, clients also incur certain charges imposed by other third parties, such as broker-dealers, custodians, trust companies, banks and other financial institutions (collectively "Financial Institutions"). These additional charges include securities brokerage commissions, transaction fees, custodial fees, margin costs, reporting charges, charges imposed directly by a mutual fund or ETF in a client's account, as disclosed in the fund's prospectus (e.g., fund management fees and other fund expenses), deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. The Firm's brokerage practices are described at length in Item 12, below.

DIFI will provide investment advisory services and portfolio management services but will not provide custodial or other administrative services. At no time will DIFI accept or maintain custody of a client's funds or securities except for authorized fee deduction. The Client may contact the Custodian directly for disbursements, or account record changes, and may also do so in writing to the custodian. DIFI may act at the client's convenience to facilitate such written communications to the Custodian, provided that such action is not construed to be custody of client assets.

Fee Deduction Disclosure

Where DIFI deducts its management fee from client accounts utilizing a qualified custodian, DIFI is required to meet the following requirements.

a. Possess written authorization from the client to deduct advisory fees from an account held by a qualified custodian;

b. The firm must send the qualified custodian a written invoice detailing the fee amount to be deducted from the client account; and,

c. The firm must send the client a written invoice itemizing the fee, the invoice must detail any formulae used to calculate the fee, the time period covered by the fee and the amount of assets under management on which the fee was based. This may be included with the client's quarterly performance report.

Right of Cancellation

In addition to the right to terminate an agreement pursuant to its terms, a client may cancel an agreement with DIFI within five (5) business days of first receiving a copy of this disclosure brochure and supplement without penalty or fee.

B. Financial Planning Compensation Description:

DIFI charges on a flat fee basis for financial planning and consulting services. The total estimated fee, as well as the ultimate fee charged, is based on the scope and complexity of our engagement with the client.

For Financial Consulting clients who do not require a full written financial plan, fees are generally charged at a rate of up to $300 for a 90-minute consultation.

The flat fees for Financial Planning range from $1,000 to $5,000. Recurring fees will not exceed $5,000 annually. Our firm requires payment in full upon execution of the Agreement. Our firm will not require a retainer exceeding $500 when services cannot be rendered within 6 months. In the event of termination, the client will be charged for the portion of work performed by the Firm and any unearned fees will be refunded to the client.

ITEM 6 PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

DIFI does not charge or accept performance-based fees therefore this question is not applicable.

ITEM 7 TYPES OF CLIENTS

DIFI provides investment advice to many different types of clients. These clients generally include individuals, conservatorships, trusts, estates, corporations, and other types of business entities.

DIFI does not require a minimum account size.

ITEM 8 METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

METHODS OF ANALYSIS

The Firm may use the following methods when considering investment strategies and recommendations.

CHARTING REVIEW

Charting is a technical analysis that charts the patterns of stocks, bonds, and commodities to help determine buy and sell recommendations for clients. It is a way of gathering and processing price and volume information in a security by applying mathematical equations and plotting the resulting data onto graphs in order to predict future price movements. A graphical historical record assists the analyst in spotting the effect of key events on a security's price, its performance over a period of time, and whether it is trading near its high, near its low or in between. Chartists believe that recurring patterns of trading, commonly referred to as indicators, can help them forecast future price movements.

FUNDAMENTAL REVIEW

A fundamental analysis is a method of evaluating a company or security by attempting to measure its intrinsic value. Fundamental analysis attempts to determine the true value of a company or security by looking at all aspects of the company or security, including both tangible factors (e.g., machinery, buildings, land, etc.) and intangible factors (e.g., patents, trademarks, “brand” names, etc.). Fundamental analysis also involves examining related economic factors (e.g., overall economy and industry conditions, etc.), financial factors (e.g., company debt, interest rates, management salaries and bonuses, etc.), qualitative factors (e.g., management expertise, industry cycles, labor relations, etc.), and quantitative factors (e.g., debt-to-equity and price-to-equity ratios).

The end goal of performing fundamental analysis is to produce a value that an investor can compare with the security's current price with the aim of determining what sort of position to take with that security (e.g., if underpriced, the security should be bought; if overpriced the security should sold). Fundamental analysis uses real data to evaluate a security's value. Although most analysts use fundamental analysis to value stocks, this method of valuation can be used for many types of securities.

TECHNICAL REVIEW

A technical analysis is a method of evaluating securities that analyzes statistics generated by market activity, such as past prices and volume. Technical analysis does not attempt to measure a security's intrinsic value, but instead uses past market data and statistical tools to identify patterns that can suggest future activity. Historical performance of securities and the markets can indicate future performance.

CYCLICAL REVIEW

A cyclical analysis assumes the market reacts in reoccurring patterns that can be identified and leveraged to provide performance. Cyclical analysis of economic cycles is used to determine how these reoccurring patterns, or cycles, affect the returns of a given investment, asset, or company. Cyclical analysis is a time-based assessment which incorporates past and present performance to determine future value. Cyclical analyses exist because the broad economy has been shown to move in cycles, from periods of peak performance to periods of low performance. The risks of this strategy are two-fold: (1) the markets do not always repeat cyclical patterns; and (2) if too many investors begin to implement this strategy, it changes the very cycles of which they are trying to take advantage.

ECONOMIC REVIEW

An economic analysis determines the economic environment over a certain time horizon. This involves following and updating historic economic data such as U.S. gross domestic product and consumer price index as well as monitoring key economic drivers such as employment, inflation, and money supply for the world’s major economies.

INVESTMENT STRATEGIES

When implementing investment advice to clients, the Firm may employ a variety of strategies to best pursue the objects of clients. Depending on market trends and conditions, DIFI will employee any technique or strategy herein described, at the Firm’s discretion and in the best interests of the client. The Firm does not recommend any particular security or type of security. Instead, the Firm makes recommendations to meet a particular client’s financial objectives. There is inherent risk to any investment and clients may suffer loss of ALL OR PART of a principal investment.

Long-Term Purchases

Long-term purchases are securities that are purchased with the expectation that the value of those securities will grow over a relatively long period, generally greater than one year. Long-term purchases may be affected by unforeseen changes in the company in which a client is invested or in the overall market. Long term trading is designed to capture market rates of both return and risk. Frequent trading can affect investment performance, particularly through increased brokerage and other transaction costs and taxes. Due to its nature, the long-term strategy can expose clients to various other types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include, but are not limited to, inflation (purchasing power) risk, interest rate risk, economic risk, and political/regulatory risk.

Short-Term Purchases

Short-term purchases are securities that are purchased with the expectation that they will be sold within a relatively short period of time, generally less than one year, to take advantage of the securities' short-term price fluctuations. Short-term trading generally holds greater risk. Frequent trading can affect investment performance due to increased brokerage fees and other transaction costs and taxes.

Strategic Asset Allocation

Asset allocation is a combination of several different types of investments; typically, this includes stocks, bonds, and cash equivalents among various asset classes to achieve diversification. The objective of asset allocation is to manage risk and market exposure while still positioning a portfolio to meet financial objectives.

Risk of Loss

Investing inherently involves risk up to and including loss of the principal sum. Further, past performance of any security is not necessarily indicative of future results. Therefore, future performance of any specific investment or investment strategy based on past performance should not be assumed as a guarantee. DIFI does not provide any representation or guarantee that the financial goals of clients will be achieved.

The potential return or gain and potential risk or loss of an investment varies, generally speaking, with the type of product invested in. Below is an overview of the types of products available on the market and the associated risks of each:

General Risks. Investing in securities always involves risk of loss that you should be prepared to bear. We do not represent or guarantee that our services or methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines. We cannot offer any guarantees or promises that your financial goals and objectives can or will be met. Past performance is in no way an indication of future performance. We also cannot assure that third parties will satisfy their obligations in a timely manner or perform as expected or marketed.

General Market Risk. Investment returns will fluctuate based upon changes in the value of the portfolio securities. Certain securities held may be worth less than the price originally paid for them, or less than they were worth at an earlier time.

Common Stocks. Investments in common stocks, both directly and indirectly through investment in shares of ETFs, may fluctuate in value in response to many factors, including, but not limited to, the activities of the individual companies, general market and economic conditions, interest rates, and specific industry changes. Such price fluctuations subject certain strategies to potential losses. During temporary or extended bear markets, the value of common stocks will decline, which could also result in losses for each strategy.

Portfolio Turnover Risk. High rates of portfolio turnover could lower performance of an investment strategy due to increased costs and may result in the realization of capital gains. If an investment strategy realizes capital gains when it sells its portfolio investments, it will increase taxable distributions to you. High rates of portfolio turnover in a given year would likely result in short-term capital gains and under current tax law you would be taxed on short-term capital gains at ordinary income tax rates, if held in a taxable account.

Non-Diversified Strategy Risk. Some investment strategies may be non-diversified (e.g., investing a greater percentage of portfolio assets in a particular issuer and owning fewer securities than a diversified strategy). Accordingly, each such strategy is subject to the risk that a large loss in an individual issuer will cause a greater loss than it would if the strategy held a larger number of securities or smaller positions sizes.

Model Risk. Financial and economic data series are subject to regime shifts, meaning past information may lack value under future market conditions. Models are based upon assumptions that may prove invalid or incorrect under many market environments. We may use certain model outputs to help identify market opportunities and/or to make certain asset allocation decisions. There is no guarantee any model will work under all market conditions. For this reason, we include model related results as part of our investment decision process but we often weigh professional judgment more heavily in making trades or asset allocations.

ETF Risks, including Net Asset Valuations and Tracking Error. An ETF's performance may not exactly match the performance of the index or market benchmark that the ETF is designed to track because 1) the ETF will incur expenses and transaction costs not incurred by any applicable index or market benchmark; 2) certain securities comprising the index or market benchmark tracked by the ETF may, from time to time, temporarily be unavailable; and 3) supply and demand in the market for either the ETF and/or for the securities held by the ETF may cause the ETF shares to trade at a premium or discount to the actual net asset value of the securities owned by the ETF. Certain ETF strategies may from time to time include the purchase of fixed income, commodities, foreign securities, American Depository Receipts, or other securities for which expenses and commission rates could be higher than normally charged for exchange-traded equity securities, and for which market quotations or valuation may be limited or inaccurate. Clients should be aware that to the extent they invest in ETF securities they will pay two levels of advisory compensation – advisory fees charged by DIFI plus any advisory fees charged by the issuer of the ETF. This scenario may cause a higher advisory cost (and potentially lower investment returns) than if a Client purchased the ETF directly. An ETF typically includes embedded expenses that may reduce the ETF's net asset value, and therefore directly affect the ETF's performance and indirectly affect a Client’s portfolio performance or an index benchmark comparison. Expenses of the ETF may include investment advisor management fees, custodian fees, brokerage commissions, and legal and accounting fees. ETF expenses may change from time to time at the sole discretion of the ETF issuer. ETF tracking error and expenses may vary.

Inflation, Currency, and Interest Rate Risks. Security prices and portfolio returns will likely vary in response to changes in inflation and interest rates. Inflation causes the value of future dollars to be worth less and may reduce the purchasing power of an investor’s future interest payments and principal.

Inflation also generally leads to higher interest rates, which in turn may cause the value of many types of fixed income investments to decline. In addition, the relative value of the U.S. dollar-denominated assets primarily managed by DIFI may be affected by the risk that currency devaluations affect Client purchasing power.

Liquidity Risk. Liquidity is the ability to readily convert an investment into cash to prevent a loss, realize an anticipated profit, or otherwise transfer funds out of the particular investment. Generally, investments are more liquid if the investment has an established market of purchasers and sellers, such as a stock or bond listed on a national securities exchange. Conversely, investments that do not have an established market of purchasers and sellers may be considered illiquid. Your investment in illiquid investments may be for an indefinite time, because of the lack of purchasers willing to convert your investment to cash or other assets.

Legislative and Tax Risk. Performance may directly or indirectly be affected by government legislation or regulation, which may include, but is not limited to: changes in investment advisor or securities trading regulation; change in the U.S. government's guarantee of ultimate payment of principal and interest on certain government securities; and changes in the tax code that could affect interest income, income characterization and/or tax reporting obligations, particularly for options, swaps, master limited partnerships, Real Estate Investment Trust, Exchange Traded Products/Funds/ Securities. We do not engage in tax planning, and in certain circumstances a Client may incur taxable income on their investments without a cash distribution to pay the tax due. Clients and their personal tax advisors are responsible for how the transactions in their account are reported to the IRS or any other taxing authority.

Foreign Investing and Emerging Markets Risk. Foreign investing involves risks not typically associated with U.S. investments, and the risks maybe exacerbated further in emerging market countries. These risks may include, among others, adverse fluctuations in foreign currency values, as well as adverse political, social and economic developments affecting one or more foreign countries. In addition, foreign investing may involve less publicly available information and more volatile or less liquid securities markets, particularly in markets that trade a small number of securities, have unstable governments, or involve limited industry. Investments in foreign countries could be affected by factors not present in the U.S., such as restrictions on receiving the investment proceeds from a foreign country, foreign tax laws or tax withholding requirements, unique trade clearance or settlement procedures, and potential difficulties in enforcing contractual obligations or other legal rules that jeopardize shareholder protection. Foreign accounting may be less transparent than U.S. accounting practices and foreign regulation may be inadequate or irregular.

Information Security Risk. We may be susceptible to risks to the confidentiality and security of its operations and proprietary and customer information. Information risks, including theft or corruption of electronically stored data, denial of service attacks on our website or websites of our third-party service providers, and the unauthorized release of confidential information are a few of the more common risks faced by us and other investment advisers. Data security breaches of our electronic data infrastructure could have the effect of disrupting our operations and compromising our customers' confidential and personally identifiable information. Such breaches could result in an inability of us to conduct business, potential losses, including identity theft and theft of investment funds from customers, and other adverse consequences to customers. We have taken and will continue to take steps to detect and limit the risks associated with these threats.

Tax Risks. Tax laws and regulations applicable to an account with DIFI may be subject to change and unanticipated tax liabilities may be incurred by an investor as a result of such changes. In addition, customers may experience adverse tax consequences from the early assignment of options purchased for a customer's account. Customers should consult their out tax advisers and counsel to determine the potential tax-related consequences of investing.

Advisory Risk. There is no guarantee that our judgment or investment decisions on behalf of particular any account will necessarily produce the intended results. Our judgment may prove to be incorrect, and an account might not achieve her investment objectives. In addition, it is possible that we may experience computer equipment failure, loss of internet access, viruses, or other events that may impair access to accounts' custodians' software. DIFI and its representatives are not responsible to any account for losses unless caused by DIFI breaching our fiduciary duty.

Dependence on Key Employees. An accounts success depends, in part, upon the ability of our key professionals to achieve the targeted investment goals. The loss of any of these key personnel could adversely impact the ability to achieve such investment goals and objectives of the account.

DIFI does not primarily recommend a particular type of security.

ITEM 9 DISCIPLINARY INFORMATION

Registered investment advisers are required to disclose any legal or disciplinary events that are material to a client's or prospective client's evaluation of the advisory business or integrity of the Firm's management.

DIFI has no disciplinary disclosures. Alicia Itzaina, the owner and operator of DIFI, has no disciplinary disclosures.

ITEM 10 OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

A. <u>Registration as a Broker/Dealer or Broker/Dealer Representative</u>

DIFI is not registered and does not have an application pending to register, as a broker/dealer and its management persons are not registered as broker/dealer representative.

B. <u>Registration as a Futures Commission merchant, Commodity Pool Operator</u>

DIFI and its management persons are not registered and do not have application pending to register, as a futures commission merchant, commodity pool operator/advisor.

C. <u>Relationships Material to this Advisory Business and Possible Conflicts of Interest</u>

DIFI and its representatives do not engage in any relationship's material to our advisory business.

D. <u>Selection of Other Advisors</u>
DIFI does not recommend or select other investment advisers for its clients.

ITEM 11 CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

A. Fiduciary Status

According to Oregon law, an investment advisor is considered a fiduciary. As a fiduciary, it is an investment advisor's responsibility to provide fair and full disclosure of all material facts. In addition, an investment advisor has a duty of utmost good faith to act solely in the best interest of each of its clients. DIFI and its representatives have a fiduciary duty to all clients. DIFI and its representatives' fiduciary duty to clients is considered the core underlying principle for DIFI' Code of Ethics and represents the expected basis for all representatives' dealings with clients. DIFI has the responsibility to ensure that the interests of clients are placed ahead of it or its representatives' own investment interest. All representatives will conduct business in an honest, ethical, and fair manner. All representatives will comply with all federal and state securities laws at all times. Full disclosure of all material facts and potential conflicts of interest will be provided to clients prior to services being conducted. All representatives have a responsibility to avoid circumstances that might negatively affect or appear to affect the representatives' duty of complete loyalty to their clients.

DIFI and/or its investment advisory representatives may from time-to-time purchase or sell products or investments that they may recommend to clients. DIFI has adopted a Code of Ethics that sets forth the basic policies of ethical conduct for all managers, officers, and employees of the adviser.

In addition, the Code of Ethics governs personal trading by each employee of DIFI deemed to be an Access Person and is intended to ensure that securities transactions effected by Access Persons of DIFI are conducted in a manner that avoids any actual or potential conflict of interest between such persons and clients of the adviser or its affiliates.

DIFI collects and maintains records of securities holdings and securities transactions effected by Access Persons. These records are reviewed to identify and resolve potential conflicts of interest. DIFI' Code of Ethics is available upon request.

ITEM 12 BROKERAGE PRACTICES

A. Selection and Recommendation

DIFI has a duty to select brokers, dealers and other trading venues 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, taking into account all relevant factors. The lowest possible commission, while very important, is not the only consideration. The broker dealers DIFI currently utilizes are Charles Schwab/TD Ameritrade.

It is the policy of the Firm to seek best execution in all portfolio trading activities for all investment disciplines and products, regardless of whether commissions are charged. This applies to trading in any instrument, security, or contract including equities, bonds, and forward or derivative contracts.

The standards and procedures governing best execution are set forth in several written policies. Generally, to achieve best execution, DIFI considers the following factors, without limitation, in selecting brokers and intermediaries:

1. Execution capability;
2. Order size and market depth;
3. Availability of competing markets and liquidity;
4. Trading characteristics of the security;

5. Availability of accurate information comparing markets;
6. Quantity and quality of research received from the broker dealer;
7. Financial responsibility of the broker-dealer;
8. Confidentiality;
9. Reputation and integrity;
10. Responsiveness;
11. Recordkeeping;
12. Ability and willingness to commit capital;
13. Available technology; and
14. Ability to address current market conditions.

DIFI evaluates the execution, performance, and risk profile of the broker-dealers it uses at least annually.

B. Research and Other Soft Dollar Benefits

Soft dollar practices are arrangements whereby an investment adviser directs transactions to a broker-dealer in exchange for certain products and services that are allowable under SEC and Oregon rules. Client commissions may be used to pay for brokerage and research services and products as long as they are eligible under Section 28(e) of the Exchange Act of 1934. Section 28(e) sets forth a "safe harbor," which provides that an investment adviser that has discretion over a client account is not in breach of its fiduciary duty when paying more than the lowest commission rate available if the adviser determines in good faith that the rate paid is commensurate with the value of brokerage and research services provided by the broker-dealer.

DIFI does not currently have any soft dollar benefit arrangements.

C. Brokerage for Client Referrals

DIFI does not receive client referrals from any broker-dealer or third party as a result of the firm selecting or recommending that broker-dealer to clients.

D. Directed Brokerage.

Securities transactions are executed by brokers selected by DIFI in its discretion and without the consent of clients.

E. Trade Aggregation

Trade aggregation is the act of trading a large block of a security in a single order. Shares of a purchased security are then allocated to the appropriate accounts in the appropriate proportion. The main purposes of order aggregation are (i) for ease of trading and (ii) to obtain a lower transaction cost associated with trading a larger quantity.

DIFI will sometimes place trades on a block trade basis, but will typically trade portfolio securities on an individual basis based on the client's profile, needs and objectives.

In a situation where we do not aggregate trades, clients purchasing securities around the same time may receive a less favorable price than other clients.

Accounts for DIFI or our employees may be included in a block trade with client accounts.

ITEM 13 REVIEW OF ACCOUNTS

A. Periodic Reviews

The Firm regularly reviews and evaluates client accounts for compliance with each client's investment objectives, policies and restrictions. The Firm analyzes rates of return and allocation of assets to determine model strategy effectiveness. Such reviews are conducted by the Chief Compliance Officer of DIFI and shall occur at least once per calendar year.

B. Intermittent Review Factors

Intermittent reviews may be triggered by substantial market fluctuation, economic or political events, or changes in the client's financial status (such as retirement, termination of employment, relocation, inheritance, etc.). Clients are advised to notify DIFI promptly if there are any material changes in their financial situation, investment objectives, or in the event they wish to place restrictions on their account.

C. Reports

Clients may receive confirmations of purchases and sales in their accounts and will receive, at least monthly, statements containing account information such as account value, transactions, and other relevant information. Confirmations and statements are prepared and delivered by the custodian.

D. Financial Plans

All financial planning accounts are reviewed upon financial plan creation and plan delivery by DIFI. There are multiple levels of review for each financial plan. Each financial planning client will receive the financial plan upon completion.

ITEM 14 CLIENT REFERRALS AND OTHER COMPENSATION

A. Client Referrals

DIFI will not receive any economic benefit from another person or entity for soliciting or referring clients.

B. Other Compensation

DIFI will not pay another person or entity for referring or soliciting clients for DIFI.

ITEM 15 CUSTODY

DIFI exercises limited custody over the client's funds by direct debit management fees from the account. Where DIFI deducts its management fee from client accounts utilizing a qualified custodian, the State of Oregon requires the firm to meet the following requirements:

a. DIFI must possess written authorization from the client to deduct advisory fees from an account held by a qualified custodian;

b. DIFI must send the qualified custodian a written invoice detailing the fee amount to be deducted from the client account; and,

c. DIFI must send the client a written invoice itemizing the fee, the invoice must detail any formulae used to calculate the fee, the time period covered by the fee and the amount of assets under management on which the fee was based. This may be included with the client's quarterly performance report.

The client will also receive written statements no less than monthly from the custodian. DIFI encourages clients to carefully review their account statements for any inaccuracies. Any discrepancies should be immediately brought to the firm's attention.

ITEM 16 INVESTMENT DISCRETION

DIFI generally has discretion over the selection and amount of securities to be bought or sold in client accounts without obtaining prior consent or approval from the client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the client and agreed to by DIFI in an investment policy statement.

Discretionary authority will only be authorized upon full disclosure to the client. The granting of such authority will be evidenced by the client's execution of an Investment Advisory Agreement containing all applicable limitations to such authority. All discretionary trades made by DIFI will be in accordance with each client's investment objectives and goals and consistent with the Investment Policy statement.

The Client must understand that gains and losses are realized by discretionary activity and that these are taxable events, and that the client has authorized such activity in granting discretion. While some sensitivity to taxation is possible with discretion, if the client requires control of the taxable events, a non-discretionary approach is needed and therefore recommended, and this would require that the client's investment contract indicate the account is non-discretionary.

ITEM 17 VOTING CLIENT SECURITIES

DIFI will not vote, nor advise clients how to vote, proxies for securities held in client accounts. The client clearly keeps the authority and responsibility for the voting of these proxies. Also, DIFI cannot give any advice or take any action with respect to the voting of these proxies. The client and DIFI agree to this by contract.

For accounts subject to the provisions of the Employee Retirement Income Security Act of 1974 ("ERISA"), the plan fiduciary specifically keeps the authority and responsibility for the voting of any proxies for securities held in plan accounts. Also, DIFI cannot give any advice or take action with respect to the voting of these proxies.

ITEM 18 FINANCIAL INFORMATION

A. Balance Sheet Requirement

DIFI does not require or solicit prepayment of more than $500 in fees per client, six months or more in advance.

B. Financial Condition

DIFI has discretionary authority over client accounts and is not aware of any financial condition that will likely impair its ability to meet contractual commitments to clients. If DIFI does become aware of any such financial condition, this brochure will be updated and clients will be notified.

C. **Bankruptcy Petition**

DIFI has not been the subject of a bankruptcy petition at any time during the last 10 years.

ITEM 19 REQUIREMENTS FOR STATE-REGISTERED ADVISERS

A. Identify each of your principal executive officers and management persons, and describe their formal education and business background.

Alicia Itzaina, Manager and CCO

Alicia Itzaina, age 33, Chemeketa Community College (no degree). Relationship Banker (investment licensed), JPMorgan Chase– 2006-2017, Financial Advisor, Waddell & Reed – 2017-2018, Financial Advisor, Morgan Stanley– 2018-2020, Financial Advisor, Capstone Wealth Advisors– 2020-2021.

B. Describe any business in which the firm is actively engaged (other than giving investment advice) and the approximate amount of time spent on that business.

DIFI is not engaged in any business other than investment advisory services.

C. In addition to the description of your fees in response to Item 5 of Part IIA, if you or a supervised person are compensated for advisory services with performance-based fees, explain how these fees will be calculated. Disclose specifically that performance-based compensation may create an incentive for the advisor to recommend an investment that may carry a higher degree of risk to the client.

Neither DIFI nor any of its supervised persons is compensated in any way other than the investment advisory fees described above.

D. If you or a management person has been involved in one of the events listed below, disclose all material facts regarding the event.

1. An award or otherwise being *found* liable in an arbitration claim alleging damages in excess 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.

2. 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.

DIFI has nothing to report under this section.

E. In addition to any relationship or arrangement described in response to Item 10.C. of Part 2A, describe any relationship or arrangement that you or any of your *management persons* have with any issuer of securities that is not listed in Item 10.C. of Part 2A.

DIFI has no relationship or arrangement as described herein.

Form ADV Part 2B

Item 1 Brochure Supplement

This brochure supplement provides information about Alicia Itzaina that supplements the Divergent Financial Advisory Services, LLC d.b.a DiFi Advisory brochure. Their individual CRD number is 6109911. Please contact Alicia Itzaina if the Firm brochure was not provided. Additional information about Alicia Itzaina is available on the SEC's website at www.adviserinfo.sec.gov.

This Brochure Supplement is new as of 11/18/2021.

Item 2 Education Background and Business Experience

Alicia Itzaina, age 33, Chemeketa Community College (no degree). Relationship Banker (investment licensed), JPMorgan Chase– 2006-2017, Financial Advisor, Waddell & Reed – 2017-2018, Financial Advisor, Morgan Stanley– 2018-2020, Financial Advisor, Capstone Wealth Advisors– 2020-2021.

Item 3 Disciplinary Information

Adviser has nothing to report under this section.

Item 4 Other Business Activities

Adviser is a licensed insurance agent/broker. She may offer insurance products and receive customary fees as a result of insurance sales. A conflict of interest may arise as these insurance sales may create an incentive to recommend products based on the compensation earned. To mitigate this potential conflict, Alicia Itzaina, as a fiduciary, will act in the client's best interest.

Item 5 Additional Compensation

Neither Adviser nor any of its supervised persons is compensated in any way other than the investment advisory fees described above.

Item 6 Supervision

Alicia Itzaina is the owner and president of Divergent Financial Advisory Services, LLC d.b.a DiFi Advisory. She is also the chief compliance officer and chief investment strategist. Alicia Itzaina is not supervised by someone else because they are the sole investment professional at DiFi Advisory. However, she is bound by our Firm's Code of Ethics.

Item 7 Requirement for State Registered Advisers

A. Alicia Itzaina has not been involved with any arbitration or administrative proceeding events.
B. Alicia Itzaina has not been the subject of a bankruptcy petition.