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## FORM ADV PART 2A – FIRM BROCHURE

January 1<sup>st</sup>, 2024

This Brochure provides information about the qualifications and business practices of i2i Analytics LLC (herein referred to as “i2i Analytics”, “i2i”, the “Company”, or the “Advisor”), a registered investment advisor (RIA). Registration does not imply a certain level of skill or training but only indicates that i2i Analytics has registered its business with state and federal regulatory authorities, including the United States Securities and Exchange Commission (SEC). If you have any questions about the contents of this Brochure, please contact us at 773-852-4467. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about i2i Analytics LLC also is available on the SEC's website at:

[www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 – Material Changes

Form ADV 2 is divided into two parts: Part 2A and Part 2B. Part 2A (the “Firm Brochure”) provides information about a variety of topics relating to i2i Analytics LLC’s business practices, its investment strategies, its advisory fees, its code of ethics, and any possible conflicts of interest or disciplinary actions. Part 2B (the “Brochure Supplement”) provides specific background information about the individual advisory personnel at the Company.

At i2i Analytics we believe that communication and transparency are the foundation of our relationship with clients, and we continually strive to provide you with the most complete and accurate information at all times. We encourage all current and prospective investors to read this Firm Brochure and to discuss any questions you may have with us. And of course, we always welcome your feedback.

### Material Changes

This Firm Brochure serves as an annual update that will be made available to our clients and any prospective clients. Since the last filing and distribution of this Firm Brochure on January 1<sup>st</sup>, 2023, there have been no material changes to report. The nature of our business policies and practices, our investment strategies, and our code of ethics at i2i Analytics are discussed at length throughout the remainder of this Firm Brochure.

### Future Changes

From time to time, we may amend this Firm Brochure to reflect changes in our business practices, in regulations, and in routine policies as required by the securities regulators. This complete Firm Brochure shall be provided to each client annually and if a material change occurs in the business practices of i2i Analytics LLC.

At any time, you may view the current Firm Brochure online at the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). To review the firm information for i2i Analytics LLC, please:

- Click Investment Advisor Search in the left navigation menu
- Select the option for Investment Advisor Firm and enter 144637 (our firm’s CRD number) in the field labeled “Firm IARD/CRD Number”
- This will provide access to Form ADV Part 1 and Part 2
- Item 11 of the ADV Part 1 lists legal and disciplinary questions regarding the Advisor
- In the left navigation menu, Form ADV Part 2 is located near the bottom

You may also request a copy of this Firm Brochure at any time by contacting us at (773) 852-4467 or by emailing our Chief Compliance Officer at [dane.rutstein@i2ianalytics.com](mailto:dane.rutstein@i2ianalytics.com).

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## Item 4 – Advisory Business

### A. Description of the Company

#### Our Firm's History

i2i Analytics LLC is a Registered Investment Advisor (RIA) providing wealth management services to affluent and high net worth (“accredited”) investors and their families. The Company was formed by Jennifer Schmitz in May 2007 as a Nevada Limited Liability Company based in California. In 2008 i2i Analytics registered with the State of Illinois and subsequently in 2015 the Company moved its headquarters to Illinois. On March 31<sup>st</sup>, 2017, Ms. Schmitz sold and transferred her 100% interest in i2i Analytics LLC to Anthony K. House and Dane Rutstein. As a result of the transaction, Messrs. House and Rutstein now own respective interests of 51% and 49% in i2i Analytics LLC, having assumed the roles as managing members and officers of the Company while also continuing to serve its clients in an advisory capacity. Jennifer Schmitz resigned from i2i Analytics LLC in 2017 and is no longer affiliated with the Company. As of January 2018, i2i Analytics registered as an RIA with the State of Florida. In September 2021 we “dissolved” the Nevada registration and “domesticated” our filing status with the State of Illinois.

#### Our Principal Owners

The two principal owners and managing members of i2i Analytics LLC are Anthony (“Tony”) House (51% interest) and Dane Rutstein (49% interest). Mr. Rutstein acts in a supervisory role as the Company’s Chief Compliance Officer. As Investment Adviser Representatives, both Tony and Dane share responsibilities in the day-to-day management of client relationships and portfolio management.

### B. Types of Advisory Services Offered

#### Portfolio Management

i2i Analytics provides customized investment advisory solutions for its clients. This is achieved through continuous personal client contact and interaction while providing discretionary investment management and consulting services. i2i Analytics works with each client to identify their investment goals and objectives as well as risk tolerance and financial situation to create a suitable portfolio allocation. These various criteria for determining investor suitability will be documented on the Statement of Investment Policy (SIP), to be signed by clients in conjunction with the initial Investment Advisory Agreement. The Advisor will then construct a client portfolio, consisting primarily of exchange-traded funds (“ETFs”), mutual funds, and individual stocks and bonds to achieve the client’s investment goals. The Advisor may also utilize other security types as necessary to meet the needs of its clients.

At i2i Analytics, our investment philosophy is based on the belief that markets are efficient over the long-term but can remain relatively inefficient and irrational over the shorter term. We strive to maintain a balanced approach to seeking opportunities while managing risk. At the core of our investment management approach is a tactically-managed asset allocation strategy that seeks to capture market inefficiencies in various sectors and asset classes over time while generally maintaining a below-market “beta”, or risk posture – although risk appetite varies from client to client. In so doing, we aim to generate “alpha”, or superior returns on a risk-adjusted basis. This provides clients with a longer-term core solution which is aligned with our belief that markets are efficient and rational over longer periods of time. However, recognizing that markets can operate away from the fundamentals over the shorter term, i2i Analytics manages several technically based strategies designed to capitalize on trends that we see developing in various sectors and asset classes. The goal of these strategies is to limit losses in unfavorable market environments while attempting to outperform the broad market over longer periods of time. The Advisor employs numerous fundamental and technical methods of research and analysis along with a

balance of strategic long-term and tactical short-term investment strategies in managing these accounts (see “Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss” for further details).

Based on its proprietary research methods and due diligence process, i2i Analytics will construct, implement and monitor client portfolios to ensure they meet the goals, objectives, circumstances, and risk tolerance agreed to by the client. Each client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to the acceptance by the Advisor. We may periodically rebalance or adjust client accounts under our management. If the client experiences any significant changes to his/her financial or personal circumstances, the client must notify us so that we can consider such information in managing the client's investments.

i2i Analytics evaluates and selects ETFs and mutual funds as well as individual securities for inclusion in client portfolios only after applying our internal due diligence process. The Advisor may recommend, on occasion, redistributing investment allocations to diversify the portfolio. We may recommend specific positions to increase sector or asset class weightings. We may recommend employing cash positions as a possible hedge against market movement, which may adversely affect the portfolio. i2i Analytics may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position(s) in the portfolio, change in risk tolerance of client, generating cash to meet client needs, or any risk deemed unacceptable for the client's risk tolerance. Prior to rendering investment advisory services, i2i Analytics will ascertain, in conjunction with the client, the client's financial situation, risk tolerance, and investment objectives.

i2i Analytics provides investment advice and portfolio management services and will not provide securities custodial or other administrative services. At no time will i2i Analytics accept or maintain custody of a client's funds or securities. All client assets will be managed within their designated brokerage account, pursuant to the client Investment Advisory Agreement.

i2i Analytics provides investment advice and portfolio management to its clients based on their current and evolving financial situations. To fully understand our clients' needs, we actively seek to obtain an understanding of each our clients' financial goals, objectives, and concerns. Our advisors will consult with prospective clients to determine whether they are interested in working with our firm; such initial consultations come at no cost to the prospective client and may include a complimentary portfolio evaluation. Once clients decide to actively engage with i2i Analytics, they are required to sign an Investment Advisory Agreement along with a written Statement of Investment Policy (SIP) where the client's various financial goals, objectives, time horizon, and risk tolerance are documented. Clients will have an opportunity to review and update their Statement of Investment Policy with the Advisor at least annually. i2i Analytics and its advisors are available for periodic consultation with clients on matters that may impact their overall financial situation; such matters may include but are not limited to retirement planning, college funding, or real estate/mortgage issues. Such consultation is a service provided to clients *at no additional charge* and is included under our annual management fee; clients may request such consultation on an as-needed basis through telephone conversations, e-mail, and face-to-face meetings. Clients can expect their advisor to devote a reasonable amount of time on any such consultation, depending on the nature and complexity of the issue. Advice provided because of our consultation is non-binding: if the client elects to act on any of the recommendations made by our advisors, the client is under no obligation to proceed with such recommendations through i2i Analytics. **In no way does i2i Analytics LLC offer such consultation as a standalone service; such advice is available to our clients as part of our fiduciary duty to best understand their financial situations and to manage their investment portfolios most effectively.**

### Risk Management

As a complement to portfolio management, i2i believes that it is critical for investors to understand and manage portfolio risk. At i2i Analytics we constantly monitor risk and volatility in the markets and the impact such risks may have on our client portfolios. We regularly assess risk and volatility with respect to individual client holdings as well as at the overall client portfolio level. At the heart of i2i Analytics' risk management approach is our ability to identify and hedge potential risk using a variety of option strategies. Drawing upon our extensive careers as market-makers on the floor of the Chicago Board Options Exchange, Tony House and Dane Rutstein provide clients with over seventy-five years of option trading experience gained through all phases of market cycles. The Advisors work closely with each client on a case-by-case basis to determine the suitability of option strategies, ranging from risk-averse or conservative collars to more aggressive means of generating potential income and/or speculative returns. Clients of i2i are under no obligation to apply for option trading privileges, although most are encouraged to do so at a minimum level commensurate with their trading experience, investment knowledge, and overall ability to bear the risks and potential losses associated with options. Similarly, not all clients are qualified to trade options; i2i Analytics and its advisors will make every attempt to further educate those clients that are granted option trading privileges about the particular risks and tax consequences involved in using such option strategies. i2i Analytics strives to offer its clients a confident and customized approach to risk management that is further addressed in the following section regarding "Tailored Advisory Services and Investment Restrictions".

#### C. Tailored Advisory Services and Investment Restrictions

i2i Analytics tailors investment advisory services to the individual needs of the client. The goals and objectives for each client are documented in our Statement of Investment Policy (SIP), signed by the client pursuant to their initial agreement to work with us and reviewed with the client annually. Client profiles are created to reflect the stated goals of the client including investment objectives, time horizon, risk tolerance, liquidity needs, and tax situation. Clients can impose restrictions on the investments in their account. The Advisor may accept any reasonable limitation or restriction to discretionary authority on the account placed by the client, however, clients must understand that imposed restrictions may limit performance or prevent us from what we deem necessary to maintain the client's investment strategy. That said, we are always willing to respect the uniqueness of each client's situation and work with them in a customized fashion. Among the means that we tailor our advisory services to clients are:

#### Highly Concentrated Stock Position Solutions

A number of our clients own highly concentrated positions in individual common stock(s), typically at a highly appreciated cost basis. i2i Analytics can help such clients reduce the risk and volatility associated with such concentrated positions using a variety of equity option strategies. Working closely together with clients in such a situation, the Advisor seeks to execute a tailored options strategy designed to quantify the client's stated intentions. In some cases, this may involve monetizing a concentrated position through the use of "covered calls" in order to potentially generate an additional income stream for the client. In other circumstances, clients may express the desire to establish a safety net through the use of a "married put" option strategy. Finally, the Advisor may also recommend the use of some combination of puts and calls to establish a "protective collar" for the client's concentrated position(s). Option pricing is subject to the movement of the underlying security and the implied volatility of such holdings as well as that of the overall market. Under all circumstances, the Advisor makes every attempt to educate the client regarding the particular risks and tax consequences involved in using such tailored option strategies.

#### Option Strategies to Mitigate Potential Risk and/or Generate Potential Income

At i2i Analytics LLC we understand that each client faces a unique situation in terms of their investment objectives, risk tolerance, liquidity needs, and tax situation. Whereas most wealth management firms (including ours) create model portfolios designed, in theory, to target suitable asset allocations for each

client, we recognize that, in reality, new clients invariably have pre-existing core holdings and/or a sizable amount of cash that may need to be reallocated over time. Our clients benefit from i2i Analytics' ability to craft tailor-made option strategies designed to mitigate risk or generate potential income through the use of equity option strategies. Such strategies are particularly useful in transitioning new client accounts to our model asset allocations. Over time, many of our clients come to realize that option strategies are an integral and ongoing part of our risk management approach. For example, the Advisor working closely with qualified clients holding excessive cash or an insufficient weighting to equities might determine that the price of an individual stock or overall market is too rich for investment at current levels; in such cases, the Advisor acting on the client's discretion may instead sell "out-of-the-money" put options on the stock with the intent of either (a) generating income from the sale of put options over a specified period of time or (b) ultimately taking possession of the stock at a "discount" to current market prices at the time of the initial put sale, thereby mitigating risk. Conversely, other clients may be in a position where they are overweight or over-exposed to equities and/or face the need to raise cash in their portfolios; in such cases the Advisor may act on the client's discretion and sell "out-of-the-money" calls on existing holdings with the intent of either (a) generating potential income from the sale of call options over a specified period of time or (b) ultimately losing possession of the stock at a "premium" to current market prices at the time of the initial call sale. Finally, in certain instances it may be suitable for qualified investors to speculate on the movement of certain stocks, sectors, or overall asset classes; in such cases, the Advisor may recommend a limited-risk purchase of puts and/or calls to benefit from a favorable directional move in the underlying security or its corresponding implied volatility. Under all circumstances, the Advisor makes every attempt to educate the client regarding the particular risks and tax consequences involved in using such tailored option strategies.

#### Socially Responsible Investing (SRI) and Stock Restrictions

At i2i Analytics we are aware of the growing demand among investors to allocate their portfolio holdings along predominantly Socially Responsible Investing (SRI) principles. We work closely with such clients on an individualized basis to determine their own sensitivities, introducing them to a wide spectrum of high-quality mutual funds and ETFs which adhere strictly to environmental, social, and governance (ESG) factors used to measure the sustainability and ethical impact of their investments. Clients are always encouraged to express any restrictions against purchasing certain stocks or entire subsectors deemed "undesirable" within their investment portfolios. Clients may document such restrictions on the Statement of Investment Policy (SIP) during their initial consultation with the Advisor and through periodic contact by means of quarterly or annual client reviews.

#### Schwab Personal Choice Retirement Account (PCRA)

Some employer-sponsored retirement plans (e.g., 401(k) and 403(b) plans) allow their participants to open a "self-directed" brokerage option through Charles Schwab's *Personal Choice Retirement Account (PCRA)*. With a Schwab PCRA, clients have the freedom to select investments beyond the limited scope of fund offerings available through their traditional employer-based plans. Clients seeking to benefit from our portfolio management expertise may grant i2i Analytics discretion to advise directly on their Schwab PCRA accounts. We assist clients with all aspects of the "self-directed" brokerage process, including the initial account opening and funding, asset allocation, portfolio management, future contributions to and/or distributions from the Plan, as well as integrating the Schwab PCRA into their overall financial plans. While clients grant us access to manage their PCRA investments directly, Schwab does NOT provide us with the ability to deduct management fees directly from these specific accounts. As a result, clients opting to open a Schwab PCRA must arrange with their Advisor for the external payment of quarterly management fees and will be subject to the same negotiable fee schedule set forth in "Item 5 – Fees and Compensation".

#### Collaborative Relationships with "Advisor-Friendly" Trust Administrators

Certain clients may either deem it necessary or be required to name a Corporate Trustee (such as a Bank) to administer their Trust account. Under such circumstances, we have established collaborative relationships with a select number of "Advisor-Friendly" Trust Administrators which allow clients to

benefit from our expertise on the investment management side of their Trust. Such “Advisor-Friendly” Trustees vary in size, scope, and specialization. As such, we work closely with clients to determine which Administrator might provide the best fit for their Trust and Estate Planning needs. Clients must be aware that they will be subject to any separate fees charged by their Trust Administrator in addition to the quarterly management fee charged by their Advisor and i2i Analytics LLC, as set forth in “Item 5 – Fees and Compensation”.

D. As of the date of this brochure, i2i Analytics LLC does not participate in any Wrap Fee Programs.

E. As of January 1<sup>st</sup>, 2024, i2i Analytics LLC provided advice on \$72,907,767 of financial assets for roughly 30 households. This includes all financial assets of clients who engage i2i Analytics for ongoing advice on their investment portfolios, and this advice is regular and continuous in nature. Of these assets, the vast majority are managed by i2i Analytics on a discretionary basis. This topic will be addressed later in this document in “Item 16 – Investment Discretion”.

## Item 5 – Fees and Compensation

i2i Analytics LLC operates strictly as a “fee-only” Advisor. We do not receive commissions or any type of “third party” payment. We are compensated for our advisory services by charging a management fee based on the net asset value of client accounts at the end of each quarter. Management fees depend upon investment strategy, account size, and complexity. **Fees are entirely negotiable between the client and the Advisor.** The Advisor and client shall document specific account information regarding advisory fees and the selection of a Custodian in the Statement of Investment Policy (SIP); this information will be reviewed by client with their Advisor annually. While i2i Analytics does not adhere to a strict fee schedule, prospective clients should refer to the following table as a guideline to the maximum fee we may charge:

Assets Under Management	Diversified Portfolio	Highly Concentrated Positions
Under \$1 Million	1.25%	1.00%
\$1 Million and above	1.00%	0.75%

Under certain circumstances the Advisor may agree to waive management fees on specific client accounts outside the scope of their core holdings (such as those of a minor child); this may be done by the Advisor as an extended courtesy with the understanding that such accounts may at some point grow in size or complexity such that they would become fully managed discretionary accounts subject to quarterly fees.

Management fees are deducted from client accounts on a quarterly basis by the custodian with which the client maintains his or her account(s). Currently, i2i Analytics has established relationships with two custodians (“broker-dealers”) – Charles Schwab & Co., Inc. (“Schwab”) and Interactive Brokers Group LLC (“IB”). Among other functions, Schwab and IB act as broker-dealers responsible primarily for maintaining custody of client assets and cash equivalents, for executing, clearing and settling trades placed by the Advisor on behalf clients in discretionary client accounts, for providing clients with monthly statements and/or online access to account balances and activity, and for processing client requests to move funds into or out of their accounts. The Advisor calculates advisory fees four times per year (typically within two weeks of the end of each quarter) and submits a request with the appropriate custodian to debit client accounts. The formula used to determine fees is generally a straightforward arithmetic calculation but there are notable differences that exist in that process at each of our two current custodians:



#### Advisory Fees for Client Accounts under Custody of Charles Schwab & Co., Inc.

Clients maintaining accounts at Charles Schwab are billed *in advance for the current quarter*. The Advisor determines such fees based on the closing account balance in each managed client account *at the end of the previous quarter*. The formula used to calculate quarterly management fees is: (closing account balance) x (annual management fee percentage) ÷ 4. In some cases, clients may negotiate for an exception with the Advisor that certain core holdings are to be billed at a reduced fee percentage, or in rare cases, at no fee. Such exceptions are carefully applied to the fee calculation on those particular client accounts. Once the Advisor has determined the fees for each client account, an invoice is submitted to Schwab requesting that accounts be debited for advisory fees the following business day. Should an error in calculation ever appear, whether in favor of or against the client, the Advisor reserves the right to submit a “cancel and re-bill” request with Charles Schwab to accurately reflect the correct management fee. Client accounts must maintain sufficient cash balances to provide Schwab with the ability to process fee requests. The Advisor reserves the right to liquidate at their discretion an appropriate portion of client holdings to generate sufficient cash prior to submitting management fee requests.

#### Advisory Fees for Clients with Schwab Personal Retirement Accounts (PCRA)

As discussed in “Item 4 – Advisory Business,” Charles Schwab does NOT provide us with the ability to deduct management fees directly from *Personal Choice Retirement Accounts*. As a result, clients opting to open a Schwab PCRA must arrange with their Advisor for the external payment of quarterly management fees and will be subject to the same negotiable fee schedule set forth in the fee schedule above. Clients will receive an electronic invoice detailing the Schwab PCRA assets under management, the pay period, the amount payable, along with payment instructions. Once again, fees are entirely negotiable between the client and their Advisor.

#### Advisory Fees for Client Accounts under Custody of Interactive Brokers Group LLC

Clients maintaining accounts at Interactive Brokers are billed *in arrears for the previous quarter*. The Advisor determines such fees based on the closing account balance in each managed client account *at the end of the previous quarter*. The formula used to calculate quarterly management fees is: (closing account balance) x (annual management fee percentage) ÷ 4. In some cases, clients may negotiate for an exception with the Advisor that certain core holdings are to be billed at a reduced fee percentage, or in rare cases, at no fee. Such exceptions are carefully applied to the fee calculation on those particular client accounts. Once the Advisor has determined the fees for each client account, an invoice is submitted to IB requesting that accounts be debited for advisory fees the following business day. Should an error in calculation ever appear, whether in favor of or against the client, the Advisor reserves the right to submit a “cancel and re-bill” request with IB to accurately reflect the correct management fee. Client accounts must maintain sufficient cash balances in order to provide IB with the ability to process fee requests. The Advisor reserves the right to liquidate at their discretion an appropriate portion of client holdings in order to generate sufficient cash prior to submitting management fee requests.

#### Pro-Rated Billing of New Client Accounts

In addition to the “forward-looking” quarterly management fee normally assessed on discretionary accounts, i2i Analytics reserves the right to charge management fees in arrears on new client accounts on a pro-rated basis for the period of that prior quarter during which the account was initially funded. If there is more than one date upon which cash is initially deposited or assets are transferred into a new account, then a pro-rated fee will be calculated and assessed for each partial deposit of cash or transfer of assets.

#### Additional Fees

All fees paid to i2i Analytics are separate and distinct from expenses charged by mutual funds and exchange-traded funds (ETFs) to their shareholders. These fees and operating expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. If the fund sponsor also imposes a sales charge, a client may pay an initial- or a

deferred-sales or surrender charge. **As a rule, i2i Analytics purchases “no-load” mutual funds for its client accounts and owns such funds beyond the minimum holding period to avoid early redemption fees.**

A client could invest in these products directly, without the services of i2i Analytics. In that case, the client would not receive the services provided by i2i Analytics which are designed, among other things, to assist the client in determining which products or services are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the product sponsor and the fees charged by i2i Analytics to fully understand the total fees to be paid.

Traditionally, clients have paid brokerage commissions and exchange fees charged by custodians for executing trades. Our quarterly management fee is separate and distinct from such execution costs. Recently, however, Charles Schwab eliminated its trading commission on stocks and ETFs. Additionally, regarding our client accounts held at Schwab, i2i Analytics seeks to further reduce costs by selecting mutual funds from Schwab's no-load/commission-free OneSource platform. Clients should be aware that Schwab may receive remuneration from mutual funds and ETFs, their providers, and their affiliates for inclusion onto the OneSource platform. Custodians typically do not charge monthly or annual account maintenance fees, however, Charles Schwab and Interactive Brokers will assess monthly interest charges, when applicable, based on debit balances held in margin accounts. Custodians may also charge clients incidental fees for services such as same-day bank fund wires or expedited check delivery via overnight shipping.

#### Termination of Contract and Pro-Ration of Fees

Clients may request to terminate their advisory contract with i2i Analytics, in whole or in part, by providing thirty (30) days advance written notice. The client shall be responsible for any management fees up to and including the effective date of termination. Upon termination, any fees paid in advance shall be prorated to the date of the termination and any excess will be calculated and refunded to the client within a reasonable amount of time. The client's Investment Advisory Agreement with the Advisor is non-transferable without client's written approval.

**Pursuant to state regulations, unless a client has received a copy of this Firm Brochure at least 48 hours prior to signing the Investment Advisory Agreement, the contract may be terminated by the client within five (5) business days of signing the contract without incurring any advisory fees.**

**Neither i2i Analytics nor any of its advisors or supervised persons accepts compensation for the sale of any securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds. This practice presents a conflict of interest and would give the Advisor an incentive to recommend investment products based on the compensation received, rather than on a client's needs. When the Advisor recommends that clients purchase mutual funds, we generally recommend "no-load" funds. Clients have the option to purchase investment products that we recommend through other brokers or agents that are not affiliated with i2i Analytics LLC.**

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

i2i Analytics does not charge or accept performance-based fees for capital gains or appreciation of client assets (such as those charged by a hedge fund). The Advisor receives no financial incentive to recommend any particular investment options to its clients. Our advisory fees are only those charges as disclosed above in “Item 5 – Fees and Compensation”.

## Item 7 – Types of Clients

i2i Analytics provides investment advice to affluent and high net worth (“accredited”) investors and their families. We manage portfolios for such households in a variety of account types including individual retirement accounts (IRAs, SEP-IRAs, SIMPLE IRAs, Roth IRAs, Inherited or Beneficiary IRAs, and Individual 401(k)s as well as taxable accounts (individual, joint, or custodial accounts and Trust accounts). The Advisor does consider the client’s overall financial situation when managing accounts, including those held with other advisors or brokers. Under some circumstances, if desired, clients may seek general portfolio allocation advice on outside accounts with limited fund menu selections such as 401(k) or 529 Plans which are “held away”; typically, this is done as a courtesy in conjunction with the client’s stated financial objectives and with the understanding that the Advisor is ultimately not responsible for the execution of securities trades in or the performance of such outside accounts.

The relative percentage of each type of client is available on i2i Analytics’ Form ADV Part 1. Currently over 75% of our clients are considered high net worth (“accredited”) investors and their families. The remainder of our client base consists of affluent investors and their families with over \$100,000 of liquid assets to invest. These percentages will vary over time. i2i Analytics does not require a minimum account size or a minimum net worth to work with our advisors, especially insofar as many households maintain a variety of smaller, tangential accounts outside of their core holdings. At the present time, the average assets under management (AUM) per client household at i2i Analytics is \$2.35 million dollars.

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

### A. Methods of Analysis and Investment Strategies

i2i Analytics relies on both fundamental analysis and technical analysis methods in generating investment strategies for its clients. Fundamental analysis is derived from numerous sources, including research reports made available through broker-dealers and global asset managers, as well as data and research from third-party providers like Morningstar®. We also receive periodic releases and updates from mutual fund managers and providers of exchange-traded funds (ETFs) including their commentary on economic outlook, observations on market cycles, and recommendations for asset allocation. Our advisors track analyst coverage of individual stocks and client holdings in the financial media and through quarterly earnings and conference calls, annual corporate reports, and press releases. We have developed a proprietary methodology used to screen and evaluate mutual funds and ETFs for their inclusion into our asset allocation models and client portfolios. This methodology strives to identify mutual funds and ETFs that offer an optimal blend of modern portfolio theory (MPT) metrics (e.g., alpha, beta, Sharpe ratio, standard deviation, upside vs. downside capture) along with consistently high fund rankings from Morningstar® and/or performance versus its benchmark and peers. In the actively managed space, special consideration is given to fund managers with a unique or “niche” management style that is not replicable, while in the passively managed area we screen particularly for “smart beta” funds that target innovative “factors” such as high-quality earnings, long-term dividend consistency, or low volatility to redefine well-known benchmarks. We also perform extensive technical analysis of chart patterns and use numerous studies to assess the health of individual stocks, indices, and futures in order to anticipate trends and market behavior over multiple timeframes. As a rule, our process of screening and selecting stocks, mutual funds and ETFs relies largely upon our methods of fundamental analysis, while determining execution price points for trades is based to a large extent on our use of technical analysis.

At i2i Analytics we generally adopt a buy-and-hold approach to investing on behalf of our clients. Our client allocations – predominantly quality “blue-chip” individual stocks and core mutual funds and ETFs –

are usually held for well over a year. That said, as seasoned traders, each with twenty-five years of experience as market-makers on the trading floor of the Chicago Board Options Exchange, we strive to be prudent whenever short-term risks or opportunities present themselves. We try to anticipate and react to such risks and opportunities by means of several tactical investment strategies. We may use “dollar-cost averaging”, especially when clients come to us with overwhelmingly large cash positions as the result of a liquidity event (e.g., real estate or business sale, inheritance, 401(k) rollover). We use option strategies to hedge existing positions and/or to potentially generate income on underinvested portfolios with large cash balances. Conversely, we may raise cash as an important asset class during periods of volatility and heightened market uncertainty; the conventional wisdom is that cash can smooth out returns during down-market cycles, but we particularly value cash as an asset class because it enables us to participate opportunistically during choppy or sideways churning market conditions where positive absolute returns may be elusive. For clients with accounts at Charles Schwab, we utilize the transaction-free/no-load OneSource platform to rebalance quality core holdings periodically in a frictionless and highly cost-effective manner by systematically adding to or scaling out of core mutual funds and ETFs, particularly in retirement accounts where there are no immediate tax consequences. Taxable accounts may receive favorable treatment by utilizing “tax-loss harvesting” to lower a client’s tax liability whenever possible; such a strategy should be coordinated with the client and his/her tax advisor so that we are in concert with their overall tax situation in any given fiscal year. Finally, our investment philosophy is based on a firm belief that, all things being equal, proactive incremental shifts are more prudent than occasional yet massive reactions. Simply stated, we adhere to the old market adage: “never sell on one day’s news.”

**Despite our efforts to research meaningful trends and opportunities, despite our efforts to identify and manage potential risks – investing in securities involves risk of loss that clients should be prepared to bear. i2i Analytics and its advisors cannot guarantee any performance or that a client will avoid a loss of account assets.**

## B. Material Risks Involved in Our Methods of Analysis and Investment Strategies

When evaluating risk, financial loss may be viewed differently by each client and may depend on many different risk items, each of which may affect the probability of adverse consequences and the magnitude of any potential losses. The following risks may not be all-inclusive but should be considered carefully by a prospective client before retaining i2i’s services. These risks should be considered as possibilities, with additional regard to their actual probability of occurring and the effect on a client if there is in fact an occurrence:

- **Market Risk** – The price of any security or the value of an entire asset class can decline for a variety of reasons outside of i2i’s control, including, but not limited to, changes in the macroeconomic environment, unpredictable market sentiment, forecasted or unforeseen economic developments, interest rates, regulatory changes, and domestic or foreign political, demographic, or social events. If a client has a high allocation in a particular asset class, it may negatively affect overall performance to the extent that the asset class underperforms relative to other market assets. Conversely, a low allocation to a particular asset class that outperforms other asset classes in a particular period will cause that client account to underperform relative to the overall market.
- **Advisory Risk** – There is no guarantee that i2i’s judgment or investment decisions about particular securities or asset classes will necessarily produce the intended results. i2i’s judgment may prove to be incorrect, and a client might not achieve his/her investment goals.
- **Volatility and Correlation Risk** – Clients should be aware that i2i’s asset selection process is based in part on a careful evaluation of past price performance and volatility in trading instruction to evaluate future probabilities. However, it is possible that different or unrelated asset classes may exhibit similar price changes in similar directions which may adversely affect a client and may become more acute in times of market upheaval or high volatility.

- Liquidity and Valuation Risk – High volatility and/or the lack of deep and active liquid markets for a security may prevent a client from selling his/her securities at all, or at an advantageous time or price because i2i Analytics and the client’s broker-dealer may have difficulty finding a buyer and may be forced to sell at a significant discount to market value. Some securities (including ETFs) that hold or trade financial instruments may be adversely affected by liquidity issues as they manage their portfolios. While i2i Analytics values the securities held in client accounts based on reasonably available exchange-traded security data, i2i Analytics may from time to time receive or use inaccurate data, which could adversely affect security valuations.
- Business Risk – These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- Option Risk – Investments in options contracts have the risk of losing a large part or even all their value in a relatively short period of time. Option contracts are leveraged instruments that allow the holder of a single contract to control many shares of an underlying stock. This leverage can compound gains or losses. Strategies that i2i Analytics uses for its clients may involve the use of selling option contracts; any such short option positions – regardless of whether they are considered to be “covered”, “hedged”, “spread”, or “naked” – involve the risk of “assignment” where the client assumes the risk of either buying or selling a corresponding amount of the underlying stock or security. Option positions such as covered calls may limit potential gains in underlying holdings; clients may potentially face unrealized losses from an option position that could “cap” an otherwise highly profitable move in an underlying stock. Options are typically short-term, limited lifespan securities and clients should be aware of the risks of incurring unfavorable short-term capital gains/loss treatment when using options. Any client who is granted approval to trade options will receive from their broker-dealer a copy of the options disclosure document, “Characteristics & Risks of Standardized Options”. Prior to buying or selling an option, investors must read a copy of this options disclosure document, which is also available online through the Options Clearing Corporation (OCC) website at [www.theocc.com](http://www.theocc.com).
- Credit Risk – i2i Analytics cannot control and clients are exposed to the risk that financial intermediaries or security issuers may experience adverse economic consequences that may include impaired credit ratings, default, bankruptcy or insolvency, any of which may affect portfolio values or management.
- 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.
- Frequent Trading Risks – Clients of i2i Analytics need to be particularly aware of the risks involved in frequent trading of securities. Two of our strategies involve frequent trading that may adversely affect investment performance because of their embedded cost structure. First, options trading involves short-term limited lifespan instruments that can be traded repetitively from one expiration to the next (e.g., weekly, monthly, quarterly). As a result, option strategies that may be consistently profitable by nature can also lead to increased commissions costs which clients need to recognize. Option trading involves a brokerage commission based on the contract volume per trade. Client accounts using options run the risk of incurring such fees on a frequent basis. Secondly, for clients maintaining accounts at Charles Schwab, i2i Analytics adheres to a strategy of frequently dollar-cost averaging into or out of core mutual funds and ETFs, whether this arises as the result of allocating or raising cash, periodic rebalancing, or tactical/opportunistic trading. Under ordinary circumstances, such frequent trading might generate increased or even undue transaction costs and taxes; however, as highlighted in “Item 5 – Fees and Compensation”, the vast majority of our

mutual funds and ETFs are selected from Schwab's OneSource platform which enables us to scale into and out of positions seamlessly at virtually no additional transaction cost to our clients. Moreover, in taxable accounts we tend to avoid frequent sales of core mutual fund and ETF positions to mitigate tax consequences.

### C. Material Risks in Recommending Primarily One Type of Security

We use a balanced approach and recommend holding a wide range of types of securities, including individual stocks and bonds, traditional mutual funds, and exchange-traded funds (ETFs). We are keenly aware of the need to maintain liquidity and diversification in our client's portfolios, particularly during periods of extreme market uncertainty. Individual stocks can be traded during extended pre- and post-market hours, albeit at reduced liquidity, thereby enabling us to participate in market moves during potentially impactful events that might occur outside of traditional trading hours. Both individual stocks and ETFs offer us the ability to make tactical allocations during normal trading hours, in a way that mutual funds do not. Mutual funds, on the other hand, offer our clients the advantage of specialized active management that we may not be able to derive using passive ETFs. Finally, mutual funds and ETFs both offer diversification that we cannot achieve in many smaller client accounts through individual stocks alone. As a result, our approach of using several types of securities reduces (or at least balances) the material risks inherent in recommending a portfolio reliant primarily on only one type of security.

## Item 9 – Disciplinary Information

As registered investment advisors, we are required to disclose all material facts regarding any legal or disciplinary events that may be material to your evaluation of i2i Analytics LLC or the integrity of i2i's management.

In 2016 i2i Analytics LLC was issued an Order Summary Revoking Certificate from the State of California for failure to renew as a Registered Investment Advisor in that state. This order was issued to the Company on January 29<sup>th</sup>, 2016. [Please note: the failure to renew in California occurred before Tony House and Dane Rutstein became principal owners and officers of the Company. As discussed in Items 2 and 4 of this Brochure, neither Mr. House nor Mr. Rutstein had any material role in overseeing the regulatory compliance of i2i Analytics prior to their purchase of the Company on March 31<sup>st</sup>, 2017.]

**There are no legal, regulatory, or disciplinary events to report involving the Company's current principal owners and managing members, Tony House and Dane Rutstein.**

## Item 10 – Other Financial Activities and Affiliations

As a registered investment adviser, i2i Analytics must disclose information regarding our business activities (other than giving investment advice), our other activities in the financial industry, and any arrangements with related persons that are material to you or our advisory business. We are also required to disclose if we receive cash or other economic benefits from a third-party in connection with advising you.

Neither i2i Analytics nor its advisors are registered as a broker-dealer or as representatives of a broker-dealer. Furthermore, neither the firm nor its advisors are registered as a futures commission merchant, commodity pool operator or a commodity trading advisor. We may provide referrals to other financial service providers (e.g., accountants, attorneys, insurance agents) as a service to our clients. The Advisor

does not have agreements with or receive referral fees from any other firms or individual professionals. We do not utilize nor select other advisors or third-party managers. All client assets are managed by i2i Analytics and its advisors.

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

### A. Code of Ethics

i2i Analytics’ paramount ethical, professional, and legal duty is always to act as a fiduciary to its clients. This means that i2i puts the interests of our clients ahead of its own and carefully manages for any perceived or actual conflict of interest that may arise in relation to its advisory services. We have adopted a Code of Ethics that covers all supervised persons of the Company including its principal owners, Anthony House and Dane Rutstein. Our Code of Ethics sets forth, among other things, general provisions and guidelines regarding the ethical conduct and “best practices” for us to adhere to on a day-to-day basis. Our Code of Ethics deals specifically with our business practices with respect to our proprietary trading activities and includes explicit policies prohibiting the use of insider information. Clients may obtain a copy of our Code of Ethics upon written request by contacting our Chief Compliance Officer, Dane Rutstein, at 773-852-4467 or [dane.rutstein@i2ianalytics.com](mailto:dane.rutstein@i2ianalytics.com).

### B. Participation or Interest in Client Transactions and Personal Trading

i2i Analytics LLC, its advisors, or any individuals employed by the Company may buy or sell securities identical to or different than those recommended to clients for their personal accounts. In addition, any related person(s) may have an interest or position in certain securities which may also be recommended to a client. It is the expressed policy of i2i Analytics that no manager, advisor or any other person employed by i2i may purchase or sell any security prior to a transaction(s) being implemented for an advisory account, and therefore, preventing such employees from benefiting from transactions placed on behalf of advisory clients. To avoid any potential conflict of interest with its clients, i2i Analytics, its advisors, and its employees may trade in the same securities with client accounts only on an *aggregated basis*. In such circumstances, the affiliated personal employee accounts and client accounts will share commission costs equally and receive securities at the shared total average price. As a result, employees at i2i Analytics (including its advisors) will not face a conflict of interest when purchasing or selling securities that the Company recommends to any of its clients. In the event that a partial fill is obtained on any aggregated order that may have been intended to include an i2i Analytics employee account, allocations to client accounts shall always take precedent before any allocations to i2i Analytics employee accounts may be made. (A more general discussion of our practice of aggregating client trades can be found in the following section, “Item 12 – Brokerage Practices”.)

## Item 12 – Brokerage Practices

### A. Recommended Relationships with Broker-Dealers

i2i Analytics LLC currently maintains relationships with two broker-dealers: Charles Schwab & Co., Inc. (“Schwab”) and Interactive Brokers Group LLC (“IB”). While clients are free to choose any broker-dealer or other service provider as their custodian, we strongly recommend that clients establish an account with a brokerage firm with which we have an existing relationship. Such relationships may include benefits provided to our firm, including but not limited to market information and administrative services that help our firm manage client accounts. We believe that the recommended broker-dealers provide quality

execution services for our clients at competitive prices. Price is not the sole factor we consider in evaluating best execution. We also consider the quality of the brokerage services provided by recommended broker-dealers, including the value of the firm's reputation, execution capabilities, commission rates, and responsiveness to our clients and our firm. In recognition of the value of the services recommended broker-dealers provide, clients may pay higher commissions and/or trading costs than those that may be available elsewhere.

As a registered investment adviser, i2i Analytics has access to the institutional platform of your account custodian. As such, we will also have access to research products and services from your account custodian and/or other brokerage firms. These products may include financial publications, information about particular companies and industries, research software, and other products or services that provide lawful and appropriate assistance to our firm in the performance of our investment decision-making responsibilities. Such research products and services are provided to all investment advisers that utilize the institutional services platforms of these firms and are not considered to be paid for with "soft dollars". However, clients should be aware that the commissions charged by a particular broker for a particular transaction or set of transactions may be greater than the amounts another broker who did not provide research services or products might charge.

#### B. Policy Regarding Aggregated Trade Orders

In the interest of better trade execution, i2i Analytics may, but is not required to, aggregate orders for a client's account with orders of other clients. In connection therewith, i2i may aggregate securities sale and purchase orders for a client with similar orders being made contemporaneously for other client accounts. In such an event, the average price of the securities purchased or sold in such a transaction will be determined by the custodian, and each client would share commission costs equally and receive securities at the shared total average price. As a result, the price may be either more or less favorable to the client than it would be if similar transactions were not being executed concurrently for other accounts. In reality, the practice of aggregating trades is particularly useful when allocating or reallocating among ETFs or individual stocks or option positions that are commonly held (or desired to be held) across multiple client accounts. Such allocations and reallocations may occur due to a variety of factors, including market fluctuation or updated research reports and a subsequent need to rebalance portfolios.

### Item 13 – Review of Accounts

#### A. Day-to-Day and Periodic Review of All Client Accounts

The day-to-day review of discretionary client accounts is the hallmark of our active management philosophy at i2i Analytics. Individual securities held in client accounts under our firm's management are monitored daily by our firm's principal owners and primary financial advisors, Tony House and Dane Rutstein. Accounts are also frequently reviewed at the portfolio level on an aggregate basis per household in order to ensure that the client's overall asset allocation is in line with their stated investment objectives and level of risk tolerance. Increased scrutiny of portfolio allocations may be triggered by factors such as a material change in a client's financial circumstances, or by dramatic shifts in the political and economic landscape and a corresponding uptick in market volatility.

#### B. Ongoing Review of Client Accounts with Option Positions and/or Option Trading Privileges

Because of its widespread use of and extensive familiarity with options and sophisticated option strategies, i2i Analytics maintains an additional and ongoing level of scrutiny of those client accounts with current



option positions and/or option trading privileges. Options are *limited lifespan time-sensitive securities*, and each option strategy entails a *rapidly shifting risk/reward dynamic*. As a result, our advisors must continuously track a variety of factors that may have a material impact on client accounts including:

- monitoring current option positions held by clients and constantly assessing the changing risk/reward metrics of those positions based upon variables such as price, time decay, direction, and volatility
- maintaining awareness of approaching expiration dates of current option positions held by clients and assessing the appropriate timeframe, if any, within which to close out or “roll” the current position
- screening underlying securities for upcoming earnings releases, dividend ex-dates or other important events that may have a material impact on the underlying security as well as current or potential option positions
- monitoring client accounts, particularly those with Level 3 option trading privileges, for potential and actual put or call option assignments that would significantly impact client cash balances upon being obligated to buy or sell shares of an underlying stock
- proactively maintaining awareness of client account holdings and cash balances with respect to the client’s allocation needs and suitability to participate readily in tactical option opportunities which may arise suddenly and unpredictably during normal hours or extended market trading sessions

### C. Performance Reporting and Portfolio Analysis

i2i Analytics provides all clients with continuous online access via their custodial websites to real-time reporting information about account status, securities positions, and balances. Clients receive monthly statements and trade confirmations directly from their custodial broker-dealers, and mutual fund or ETF companies, as applicable. In addition to correspondences and alerts from custodians, clients can also expect to receive periodic e-mail communications or phone calls from i2i Analytics offering a description of portfolio performance, recent account activity, or relevant market commentary. Although not required, clients may also receive a monthly recap from the Advisor via e-mail, however, in some cases reporting is done more or less frequently via routine phone conversations or at face-to-face meetings with the client. [Note: clients with highly concentrated stock positions must be aware of the challenges of reporting performance of their portfolio holdings relative to an appropriate benchmark. In such cases, the Advisor may periodically update the client regarding performance while reminding him/her of the risks of maintaining concentrated positions.]

Portfolio analysis is routinely performed by the Advisor utilizing software tools made available through independent third-party investment research providers such as JP Morgan Asset Management, BlackRock Advisors, and Morningstar®. Such portfolio analysis is critical for the Advisor in developing portfolio models suitable for clients and for determining the extent to which a given account is in line with the client’s targeted asset allocation. These reports are intended primarily for internal use by the Advisor as a diagnostic tool and are not required to be transmitted to clients. However, clients who are interested may periodically obtain an updated portfolio analysis upon request; such reports will indicate current asset allocations, sector allocations, geographic allocations, market cap analysis, as well as specific risk/reward metrics including alpha, beta, Sharpe ratio, and standard deviation.

## Item 14 – Client Referrals and Other Compensation

### A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients

i2i Analytics LLC or its advisors do not receive any economic benefit, directly or indirectly, from any third-party for advice rendered to the firm's clients.

### B. Compensation to Non-Advisory Personnel for Client Referrals

i2i Analytics LLC does not directly or indirectly compensate any person who is not part of the firm's personnel in exchange for client referrals. i2i Analytics does not engage paid solicitors for client referrals.

## Item 15 – Custody

i2i Analytics does not accept or maintain custody of any client accounts. All clients must place their assets with a qualified custodian. Clients are required to select their own custodian to retain their funds and securities and direct i2i Analytics to utilize that custodian for the client's security transactions. As highlighted in "Item 5 – Fees and Compensation", i2i Analytics currently maintains relationships with two custodians, Charles Schwab and Interactive Brokers. Clients may grant i2i Analytics and its advisors the authority to move funds into and out of their accounts as directed, however, this is not construed as having custody of client funds. Furthermore, as outlined in "Item 5 – Fees and Compensation", clients may consent to have i2i Analytics deduct advisory fees from their accounts by its custodians. Custodians do not verify the accuracy of our advisory fee calculations. Custodians provide clients with statements indicating all amounts disbursed from their accounts including the amount of advisory fees paid directly to i2i Analytics. Although we strongly encourage clients to reach out to us for any service requests, the following information may be helpful in the event that clients must contact their Custodian directly:

- Schwab Alliance 800-515-2157 (Monday – Friday, 8:30 am – 7:00 pm ET)
- Interactive Brokers Service Desk 866-694-2757 (Monday – Friday, 8:00 am – 8:00 pm ET)

## Item 16 – Investment Discretion

For discretionary clients, i2i Analytics LLC requests that it be provided with written authority to determine which securities and the amounts of securities that are bought and sold. This authority is provided through the executed i2i Analytics Investment Advisory Agreement. Any limitations on this discretionary authority shall be included in this written authority statement. Clients are also encouraged to amend these limitations as required. Such limitations on advisor discretion shall also be documented through the Statement of Investment Policy (SIP), made available when the client initially begins working with the Advisor and made further available at the time of each client's annual review with the Advisor. Clients ultimately grant i2i Analytics and its advisors the authority to exercise discretion by signing and submitting paperwork with the custodian of their account(s).

## Item 17 – Voting Client Securities

It is our policy that i2i Analytics will not accept authority of voting proxies on behalf of its clients. We encourage our clients to vote their own proxies as a way of familiarizing themselves with their investment holdings. Clients will receive proxies and other solicitations directly from the custodian or transfer agent

for their investments. As advisors, we are available for consultation with clients to assist them when voting on important corporate actions such as mergers and acquisitions, tender offers, Dutch auctions, and other material events that would directly impact our client's investments.

## Item 18 – Financial Information

This section is not applicable since i2i Analytics LLC does not have discretionary authority or custody of client funds or securities, nor does it require or solicit prepayment of more than \$500 in fees per client six months in advance. Neither i2i Analytics nor its principal owners, Tony House and Dane Rutstein, have any financial conditions that are likely to reasonably impair our ability to meet contractual commitments to clients. As required by law to report, i2i Analytics has never been the subject of a bankruptcy petition.

## Item 19 – Requirements for State-Registered Advisers

### A. Educational Background and Business Experience of Principal Officers

The principal owners and managing members of i2i Analytics are Anthony K. House and Dane Rutstein. Information regarding the formal education and business background of the firm's principal owners is included in Item 2 of each officer's Form ADV Part 2B – Brochure Supplement (attached below).

### B. Other Business Activities of Principal Officers

Advisory persons of i2i Analytics have no additional business activities as detailed in "Item 10 – Other Financial Activities and Affiliations" and in each advisor's Form ADV Part 2B – Brochure Supplement.

### C. Performance Fee Calculations

i2i Analytics does not charge performance-based fees for its investment advisory services. The fees charged by i2i Analytics LLC, and its advisors, are as described in "Item 5 – Fees and Compensation" above and are not based upon the capital appreciation of the funds or securities held by any client. 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.

### D. Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding either of our advisors, Anthony House or Dane Rutstein. Neither i2i Analytics nor its advisors have ever been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against i2i Analytics or any of its advisors.

### E. Material Relationships with Issuers of Securities

Neither i2i Analytics nor its advisors have any relationships or arrangements with issuers of securities.



**i2i Analytics LLC**  
**2747 McDaniel Avenue**  
**Evanston, IL 60201**  
**[www.i2ianalytics.com](http://www.i2ianalytics.com)**

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## **FORM ADV PART 2B – BROCHURE SUPPLEMENT**

for

**Anthony K. House**  
**143 Bear's Paw Trail**  
**Naples, FL 34105**  
**(847) 650-1925**

**January 1<sup>st</sup>, 2024**

This Brochure Supplement provides information about Anthony K. House that supplements the i2i Analytics LLC Firm Brochure. You should have received a copy of that Brochure. Please contact our Chief Compliance Officer, Dane Rutstein, at 773-852-4467 if you did not receive i2i Analytics LLC's Brochure or if you have any questions about the contents of this supplement.

Additional information about Anthony K. House is available on the SEC's website at:

[www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

## Item 2 – Educational Background and Business Experience

Anthony (“Tony”) House is a 51% principal owner and managing member of i2i Analytics LLC. Mr. House, born in 1948, is dedicated to serving the clients of i2i Analytics LLC. Tony earned a Bachelor of Arts degree in English and Political Science from Marquette University in 1970. He served active duty in the United States Army from October 1970 to June 1971 and then remained active in the United States Army Reserves until receiving an Honorable Discharge in 1976. Tony studied Political Science at the graduate level at Loyola University of Chicago from 1971-72.

### Employment History

April 2017 – Present: i2i Analytics LLC – Principal Owner, Managing Member and Financial Advisor

June 2007 – March 2017: i2i Analytics LLC – Financial Advisor

March 1978 – June 2007: Chicago Board Options Exchange – independent Market-Maker/Floor Trader. (Served in conjunction with the CBOE marketing committee team and traveled to various cities to educate brokerage firms on the use of options.)

### Securities Industry Licensing

Series 65 - Uniform Investment Adviser Law Examination – passed March 2008

Series 7 – General Securities Representative Examination – passed October 2005

## Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. House. He has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. House.

Securities law requires a Registered Investment Advisor to disclose any instances where the Advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. House.

## Item 4 – Other Business Activities

Mr. House is not actively engaged in any investment-related business or occupation beyond his role at i2i Analytics, nor is he actively engaged in any other business or occupation for compensation.

## Item 5 – Additional Compensation

Mr. House does not receive any additional compensation outside the scope of his arrangement with i2i Analytics LLC. He does not receive economic benefits from any other sources, including sales awards and other prizes.

## Item 6 – Supervision

Mr. House serves as a principal owner and managing member of i2i Analytics LLC and is supervised by the Company's Chief Compliance Officer, Dane Rutstein. Mr. Rutstein regularly monitors the activities of Mr. House and reviews the advice he provides to his clients. i2i Analytics has implemented a Code of Ethics and internal compliance that guide each advisor in meeting their fiduciary obligations to our clients. Further, i2i Analytics is subject to regulatory oversight by various agencies. These agencies require registration by i2i Analytics and its employees. As a registered entity, i2i Analytics and its advisors are subject to examinations by regulators, which may be announced or unannounced. i2i Analytics is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor. Any questions regarding supervision or compliance should be directed to our Chief Compliance Officer, Dane Rutstein, at 773-852-4467.

## Item 7 – Requirements for State-Registered Advisers

There are no legal, civil or disciplinary events to disclose regarding Anthony K. House. He has not been involved in any arbitration claims, civil, self-regulatory organization or administrative proceedings of any kind. Mr. House has not been the subject of a bankruptcy petition.



**i2i Analytics LLC**  
**2747 McDaniel Avenue**  
**Evanston, IL 60201**  
**[www.i2ianalytics.com](http://www.i2ianalytics.com)**

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## **FORM ADV PART 2B – BROCHURE SUPPLEMENT**

for

**Dane Rutstein**  
**2747 McDaniel Avenue**  
**Evanston, IL 60201**  
**(773) 852-4467**

**January 1<sup>st</sup>, 2024**

This Brochure Supplement provides information about Dane Rutstein that supplements the i2i Analytics LLC Firm Brochure. You should have received a copy of that Brochure. Please contact our Chief Compliance Officer, Dane Rutstein, at 773-852-4467 if you did not receive i2i Analytics LLC's Brochure or if you have any questions about the contents of this supplement.

Additional information about Dane Rutstein is available on the SEC's website at:

[www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

## Item 2 – Educational Background and Business Experience

Dane Rutstein is a 49% principal owner and managing member of i2i Analytics LLC. Mr. Rutstein, born in 1960, is dedicated to serving the clients of i2i Analytics LLC. Dane earned a Bachelor of Arts degree in Political Science from Haverford College (Pennsylvania) in 1982.

### Employment History

April 2017 – Present: i2i Analytics LLC – Principal Owner, Managing Member and Financial Advisor (Serves as Senior Portfolio Manager and Chief Compliance Officer at i2i Analytics LLC.)

June 2013 – March 2017: i2i Analytics LLC – Financial Advisor

August 2010 – May 2013: Morgan Stanley Smith Barney – Financial Advisor

August 1986 – July 2010: The Dane Group, Ltd. – President – Chief Equity & Index Options Strategist. Traded as independent Market-Maker/Floor Trader on the Chicago Board Options Exchange from August 1986 – February 2008. (Served in conjunction with the CBOE marketing committee team and traveled to various cities to educate brokerage firms on the use of options.)

August 1984 – August 1986: Chicago Board Options Exchange – independent Market-Maker/Floor Trader

### Securities Industry Licensing

Series 66 - Uniform Combined State Law Examination – passed October 2010

Series 7 – General Securities Representative Examination – passed September 2010

## Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Rutstein. He has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Rutstein.

Securities law requires a Registered Investment Advisor to disclose any instances where the Advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Rutstein.

## Item 4 – Other Business Activities

Mr. Rutstein is not actively engaged in any investment-related business or occupation beyond his role at i2i Analytics, nor is he actively engaged in any other business or occupation for compensation.

## Item 5 – Additional Compensation

Mr. Rutstein does not receive any additional compensation outside the scope of his arrangement with i2i Analytics LLC. He does not receive economic benefits from any other sources, including sales awards and other prizes.



## Item 6 – Supervision

Mr. Rutstein serves as a principal owner and managing member of i2i Analytics LLC and is self-supervised under his role as the Company's Chief Compliance Officer. Mr. Rutstein regularly monitors the activities and the advice he provides to his clients. i2i Analytics has implemented a Code of Ethics and internal compliance that guide each advisor in meeting their fiduciary obligations to our clients. Further, i2i Analytics is subject to regulatory oversight by various agencies. These agencies require registration by i2i Analytics and its employees. As a registered entity, i2i Analytics and its advisors are subject to examinations by regulators, which may be announced or unannounced. i2i Analytics is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor. Any questions regarding supervision or compliance should be directed to our Chief Compliance Officer, Dane Rutstein, at 773-852-4467.

## Item 7 – Requirements for State-Registered Advisers

There are no legal, civil or disciplinary events to disclose regarding Dane Rutstein. He has not been involved in any arbitration claims, civil, self-regulatory organization or administrative proceedings of any kind. Mr. Rutstein has not been the subject of a bankruptcy petition.