

## Item 1: Cover Page

### Israilov Financial, LLC

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### **Form ADV Part 2A – Firm Brochure**

Dated March 31, 2026

This Brochure provides information about the qualifications and business practices of Israilov Financial, LLC. If you have any questions about the contents of this Brochure, please contact us at 917-626-3628 or [said@israilovfinancial.com](mailto:said@israilovfinancial.com). 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.

Israilov Financial, LLC is a registered investment adviser. Registration does not imply a certain level of skill or training.

Additional information about Israilov Financial, LLC also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov), which can be found using the firm's identification number, 331897.

## Item 2: Material Changes

The last annual update of this Brochure was filed on March 24, 2025. The following material changes have been made since that filing:

- Advisory Business (Item 4): IFL has added Investment Advisory Services as a standalone service offering, separate from Financial Planning. Investment Advisory Services include Investment Policy Statement development, portfolio design, and ongoing monitoring, provided on a non-discretionary basis.
- Fees and Compensation (Item 5): IFL has updated its fee schedule to reflect the addition of Investment Advisory Services (0.50%–1.00% annually, \$5,000 minimum), revised the Comprehensive Financial Plan fee range (\$2,000–\$5,000), replaced the Ongoing Financial Planning flat fee with a percentage-based Ongoing Advisory Service, and added Hourly Advisory Services at \$400 per hour.
- Methods of Analysis, Investment Strategies, and Risk of Loss (Item 8): IFL has added disclosure of a supplemental tactical and active investment strategy, a Non-Discretionary Model section, and two new risk disclosures (Active Management Risk and Implementation Risk).
- Review of Accounts (Item 13): Maksat Stamakunov, Chief Investment Officer, has been added as a reviewer of Client investment holdings and portfolio positioning.
- Investment Discretion (Item 16): Updated to reflect IFL's non-discretionary investment advisory services.
- Requirements for State-Registered Advisers (Item 19): Updated to reflect two principals — Saidislom Israilov (CEO, CCO) and Maksat Stamakunov (CIO).

From time to time, we may amend this Brochure to reflect changes in our business practices, changes in regulations, and routine annual updates as required by securities regulators. Either this complete Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of Israilov Financial, LLC.

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## Item 4: Advisory Business

### Description of Advisory Firm

Israilov Financial, LLC is an Investment Adviser principally located in the state of California. We are a limited liability company founded in May 2024. Israilov Financial, LLC became registered in 2024. Saidislom Israilov and Maksat Stamakunov are the principals of IFL. Saidislom Israilov serves as Chief Executive Officer and Chief Compliance Officer ("CCO"). Maksat Stamakunov serves as Chief Investment Officer ("CIO").

As used in this brochure, the words "IFL", "we", "our firm", "Advisor" and "us" refer to Israilov Financial, LLC and the words "you", "your" and "Client" refer to you as either a client or prospective client of our firm.

### Types of Advisory Services

IFL is a fee-only firm, meaning the only compensation we receive is from our Clients for our services. We offer Financial Planning and Investment Advisory Services. From time to time, IFL recommends third-party professionals such as attorneys, accountants, tax advisors, insurance agents, or other financial professionals. Clients are never obligated to utilize any third-party professional we recommend. IFL is not affiliated with nor does IFL receive any compensation from third-party professionals we may recommend.

### **Financial Planning Services**

Financial planning involves an evaluation of a Client's current and future financial state by using currently known variables to predict future cash flows, asset values, and withdrawal plans. The key defining aspect of financial planning is that through the financial planning process, all questions, information, and analysis will be considered as they affect and are affected by the entire financial and life situation of the Client. Clients purchasing this service will receive a written report, providing the Client with a detailed financial plan designed to help achieve the Client's stated financial goals and objectives.

In general, the financial plan will address some or all of the following areas of concern. The Client and IFL will work together to select specific areas to cover. These areas may include, but are not limited to, the following:

- **Cash Flow and Debt Management:** We will conduct a review of your income and expenses to determine your current surplus or deficit along with advice on prioritizing how any surplus should be used or how to reduce expenses if they exceed your income. Advice may also be provided on which debts to pay off first based on factors such as the interest rate of the debt and any income tax ramifications. We may also recommend what we believe to be an appropriate cash reserve that should be considered for emergencies and other financial goals, along with a review of accounts (such as money market funds) for such reserves, plus strategies to save desired amounts.
- **College Savings:** Includes projecting the amount that will be needed to achieve college or other post-secondary education funding goals, along with advice on ways for you to save the desired amount. Recommendations as to savings strategies are included, and, if needed, we will review your financial picture as it relates to eligibility for financial aid or the best way to contribute to children and grandchildren (if appropriate).

- **Estate Planning:** This usually includes an analysis of your exposure to estate taxes and your current estate plan, which may include whether you have a will, powers of attorney, trusts, and other related documents. Our advice also typically includes ways for you to minimize or avoid future estate taxes by implementing appropriate estate planning strategies such as the use of applicable trusts. We always recommend that you consult with a qualified attorney when you initiate, update, or complete estate planning activities. We may provide you with contact information for attorneys who specialize in estate planning when you wish to hire an attorney for such purposes. From time-to-time, we will participate in meetings or phone calls between you and your attorney with your approval or request.
- **Financial Goals:** We will help Clients identify financial goals and develop a plan to reach them. We will identify what you plan to accomplish, what resources you will need to make it happen, how much time you will need to reach the goal, and how much you should budget for your goal.
- **Insurance:** Review of existing policies to ensure proper coverage for life, health, disability, long-term care, liability, home, and automobile.
- **Investment Analysis:** This may involve developing an asset allocation strategy to meet Clients' financial goals and risk tolerance, providing information on investment vehicles and strategies, reviewing employee stock options, as well as assisting you in establishing your own investment account at a selected broker/dealer or custodian. The strategies and types of investments we may recommend are further discussed in Item 8 of this brochure.
- **Retirement Planning:** Our retirement planning services typically include projections of your likelihood of achieving your financial goals, typically focusing on financial independence as the primary objective. For situations where projections show less than the desired results, we may make recommendations, including those that may impact the original projections by adjusting certain variables (e.g., working longer, saving more, spending less, taking more risk with investments).

If you are near retirement or already retired, advice may be given on appropriate distribution strategies to minimize the likelihood of running out of money or having to adversely alter spending during your retirement years.

- **Risk Management:** A risk management review includes an analysis of your exposure to major risks that could have a significant adverse impact on your financial picture, such as premature death, disability, property and casualty losses, or the need for long-term care planning. Advice may be provided on ways to minimize such risks and about weighing the costs of purchasing insurance versus the benefits of doing so and, likewise, the potential cost of not purchasing insurance ("self-insuring").
- **Tax Planning Strategies:** Advice may include ways to minimize current and future income taxes as a part of your overall financial planning picture. For example, we may make recommendations on which type of account(s) or specific investments should be owned based in part on their "tax efficiency," with the consideration that there is always a possibility of future changes to federal, state or local tax laws and rates that may impact your situation.

We recommend that you consult with a qualified tax professional before initiating any tax planning strategy, and we may provide you with contact information for accountants or attorneys who

specialize in this area if you wish to hire someone for such purposes. We will participate in meetings or phone calls between you and your tax professional with your approval.

Financial Planning Services are offered through the following engagements:

***Comprehensive Financial Plan.*** Upon engaging the firm for creation of a comprehensive financial plan, IFL is responsible for obtaining and analyzing all necessary qualitative and quantitative information from the Client that is essential to understanding the Client's personal and financial circumstances; helping the Client identify, select, and prioritize certain financial goals while understanding the effect that pursuing one goal may have on other potential goals; assessing the Client's current course of action and alternative courses of action to identify required changes that provide the best opportunity for the client to meet their financial goals; developing & presenting financial planning recommendations based on the aforementioned actions while including all information that was required to be considered in preparing the recommendations; and ongoing monitoring of the Client's progress toward the goals and objectives that the recommendations are based around. These components all require in-depth communication with the Client in order for the planner to establish a financial plan and implementation strategy that provides the Client with the most appropriate options in pursuing their established goals and objectives.

***Project-Based Financial Planning.*** We provide project-based financial planning services on a limited scope of one-time engagement. Project-Based Financial Planning is available for Clients looking to address specific questions or issues. The Client may choose from one or more of the above topics to cover or other areas as requested and agreed to by IFL. For Project-Based Financial Planning, the Client will be ultimately responsible for the implementation of the financial plan.

## **Investment Advisory Services**

IFL offers non-discretionary investment advisory services as a standalone engagement, separate from financial planning. These services are designed for clients who seek personalized portfolio guidance, ongoing investment monitoring, and a structured investment policy framework.

Investment Advisory Services include the following:

- **Investment Policy Statement (IPS):** IFL will work with the Client to develop a written IPS documenting the Client's investment objectives, risk tolerance, time horizon, strategic asset allocation, and any investment constraints or restrictions. The IPS serves as the governing framework for all investment recommendations.
- **Portfolio Design:** Based on the IPS, IFL will recommend a target asset allocation and specific investment vehicles — primarily low-cost index funds and exchange-traded funds ("ETFs") — designed to achieve the Client's stated objectives. Where warranted by client-specific circumstances or market conditions, IFL may also recommend tactical adjustments or actively managed positions.

- **Ongoing Monitoring and Reviews:** IFL will monitor the Client's portfolio on an ongoing basis and provide periodic reviews. IFL will recommend rebalancing or adjustments when the portfolio deviates materially from its target allocation or when changes in the Client's circumstances warrant a revision to the investment strategy.

**Non-Discretionary Model.** All investment advisory services provided by IFL are non-discretionary. IFL does not have authority to execute trades or otherwise act on a Client's behalf without prior Client approval of each transaction. Clients are solely responsible for implementing any investment recommendations, including the timing and execution of all transactions. IFL does not custody Client assets. All Client assets are held at qualified custodians selected by the Client.

### **CCR Section 260.235.2 Disclosure**

For Clients who receive our Financial Planning services, we must state when a conflict exists between the interests of our firm and the interests of our Client. The Client is under no obligation to act upon our recommendation. If the Client elects to act on any of the recommendations, the Client is under no obligation to effect the transaction through our firm.

### **Client Tailored Services and Client Imposed Restrictions**

We tailor the delivery of our services to meet the individual needs of our Clients. We consult with Clients initially and on an ongoing basis, through the duration of their engagement with us, to determine risk tolerance, time horizon and other factors that may impact the Clients' investment and/or planning needs.

Clients are able to specify, within reason, any restrictions they would like to place as it pertains to individual securities and/or sectors that will be advised on or recommended. All such requests must be provided to IFL in writing. IFL will notify Clients if they are unable to accommodate any requests.

### **Wrap Fee Programs**

We do not participate in wrap fee programs.

### **Assets Under Management**

IFL does not manage Client's assets.

## Item 5: Fees and Compensation

Please note, unless a Client has received this brochure at least 48 hours prior to signing an Advisory Contract, the Advisory Contract may be terminated by the Client within five (5) business days of signing the Advisory Contract without penalty or incurring any fees.

How we are paid depends on the type of advisory services we perform. Below is a brief description of our fees, however, you should review your executed Advisory Contract for more detailed information regarding the exact fees you will be paying. No increase to the agreed-upon advisory fees outlined in the Advisory Contract shall occur without prior Client consent. Please note, lower fees for comparable services may be available from other sources. At no time do we require prepayment of \$500 or more six months or more in advance of rendering the services. Fees are negotiable and the final agreed upon fee will be outlined in your Advisory Contract.

### **Comprehensive Financial Plan**

IFL collects a fee of \$2,000–\$5,000 for creation of a Comprehensive Financial Plan. The fee range is dependent upon variables including the specific needs of the Client, complexity, estimated time, research, and resources required to provide services to you, among other factors we deem relevant. Fifty percent (50%) of the fee will be collected upfront upon engagement, and the remaining fifty percent (50%) will be collected upon delivery of the completed financial plan.

Clients who complete a Comprehensive Financial Plan and subsequently engage IFL for Ongoing Advisory Services within 90 days will receive a credit equal to 50% of the financial planning fee paid, applied toward the first year's advisory fee.

### **Ongoing Advisory Service**

IFL's Ongoing Advisory Service is a comprehensive, integrated engagement combining investment advisory and financial planning services. Under this arrangement, IFL will develop and maintain the Client's Investment Policy Statement, design and monitor the Client's portfolio, provide ongoing financial planning across relevant areas of the Client's financial life, and review and update the Client's plan and investment strategy as circumstances evolve.

Fees for Ongoing Advisory Services are charged as a percentage of the Client's financial footprint, defined as investable assets plus W-2 and 1099 income. Real estate equity and passive income are excluded from the financial footprint calculation. The standard advisory fee is 0.75% annually, with a range of 0.50%–1.00% depending on the complexity of the engagement. The exact fee will be agreed upon in writing prior to the commencement of services and documented in the Client's Advisory Contract.

- Example A: Client with \$200,000 W-2 and 1099 income and \$500,000 investable assets would pay \$5,250 per year (0.75% \* (\$200,000 + \$300,000))

- Example B: Client with \$90,000 W-2 income and \$1,000,000 investable assets would pay \$8,175 per year ( $0.75\% * (\$90,000 + 1,000,000)$ )

The minimum annual fee for Ongoing Advisory Services is \$5,000. Fees are paid quarterly in advance and will be outlined in the Advisory Contract. No increase to the agreed-upon fee shall occur without prior Client consent.

IFL may, at its discretion, waive or reduce advisory fees for up to six months for Clients who experience involuntary unemployment during the course of their engagement. Clients grandfathered under prior fee arrangements will retain their original rates.

### **Project-Based Financial Planning**

We charge a fixed fee for Project-Based Financial Planning. Fixed fee rates range from \$1,000 to \$3,000. The fee range is dependent upon variables including the specific needs of the Client, complexity, estimated time, research, and resources required to provide services to you, among other factors we deem relevant. IFL collects a portion of the fee to be collected in advance with the remainder due upon completion of the services.

### **Hourly Advisory Services**

IFL offers advisory services on an hourly basis for Clients seeking guidance on specific financial or investment questions outside of an ongoing engagement. The hourly rate is \$400 per hour. The scope of work and estimated hours will be agreed upon in writing prior to commencement of services. Fifty percent (50%) of the estimated fee will be collected upfront, with the remaining balance due upon completion of services.

### **Fee Payment**

Fees are paid by electronic funds transfer (EFT). We use an independent third party payment processor in which the Client can securely input their banking information and pay their fee. We do not have access to the Client's banking information at any time. The Client will be provided with their own secure portal in order to make payments.

### **Other Types of Fees and Expenses**

As disclosed in Item 12, all investment transactions are executed by Clients through custodians of their choosing. IFL does not execute trades on behalf of Clients and does not custody Client assets. When implementing an investment recommendation, the Client may incur additional fees such as brokerage commissions, transaction fees, and other related costs and expenses. Clients may incur certain charges imposed by broker-dealers, and other third parties such as custodial fees, 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. Mutual fund and exchange-traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees, and commissions are

exclusive of and in addition to our fee, and we shall not receive any portion of these commissions, fees, and costs.

Clients may incur fees from third-party professionals such as accountants and attorneys that IFL may recommend, upon Client request. Such fees are separate and distinct from IFL's advisory fees.

### **Terminations and Refunds**

For Ongoing Advisory Services, the Advisory Contract may be terminated with written notice at least 30 calendar days in advance. For fees paid in advance, a prorated refund will be provided for any unearned portion upon termination.

For creation of a Comprehensive Financial Plan and Project-Based Financial Planning services, this service is not an ongoing engagement, thus upon receipt of the final fees and completion of service, the Advisory Contract will automatically be terminated. Clients may terminate at any time provided written notice. For fees paid in advance, a prorated refund will be given, if applicable, upon termination of the Advisory Contract for any unearned fee. For fees paid in arrears, Client shall be charged a pro-rata fee based upon the percentage of the work done up to the date of termination.

### **Sale of Securities or Other Investment Products**

Advisor and its supervised persons do not accept compensation for the sale of securities or other investment products including asset-based sales charges or service fees from the sale of mutual funds.

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

We do not offer performance-based fees and do not engage in side-by-side management.

## Item 7: Types of Clients

We provide financial planning and investment advisory services to individuals and high net-worth individuals.

We do not have a minimum account size requirement to open or maintain an account.

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

Below is a brief description of our methods of analysis and primary investment strategies when we provide securities recommendations in the context of a financial plan.

### **Methods of Analysis**

#### **Modern Portfolio Theory (MPT)**

The underlying principles of MPT are:

- Investors are risk averse. The only acceptable risk is that which is adequately compensated by an expected return. Risk and investment return are related and an increase in risk requires an increased expected return.
- Markets are efficient. The same market information is available to all investors at the same time. The market prices every security fairly based upon this equal availability of information.
- The design of the portfolio as a whole is more important than the selection of any particular security. The appropriate allocation of capital among asset classes will have far more influence on long-term portfolio performance than the selection of individual securities.
- Investing for the long-term (preferably longer than ten years) becomes critical to investment success because it allows the long-term characteristics of the asset classes to surface.
- Increasing diversification of the portfolio with lower correlated asset class positions can decrease portfolio risk. Correlation is the statistical term for the extent to which two asset classes move in tandem or opposition to one another.

**Mutual Fund and/or ETF Analysis:** We look at the experience and track record of the manager of the mutual fund or ETF in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We also look at the underlying assets in a mutual fund or ETF in an attempt to determine if there is significant overlap in the underlying investments held in other funds in the Client's portfolio. In addition, we monitor the funds or ETFs in an attempt to determine if they are continuing to follow their stated investment strategy.

A risk of mutual fund and/or ETF analysis is that, as in all securities investments, past performance does not guarantee future results. A manager who has been successful may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in a fund or ETF, managers of different funds held by the client may purchase the same security, increasing the risk to the client if that security were to fall in value. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the fund or ETF, which could make the fund or ETF less suitable for the Client's portfolio.

### **Investment Strategies**

#### **Passive Investment Management**

Passive investing involves building portfolios that are composed of various distinct asset classes. The asset classes are weighted in a manner to achieve the desired relationship between correlation, risk, and return. Funds that passively capture the returns of the desired asset classes are placed in the portfolio. The funds that are used to build passive portfolios are typically index mutual funds or exchange-traded funds.

Passive investment management is characterized by low portfolio expenses (i.e. the funds inside the portfolio have low internal costs), minimal trading costs (due to infrequent trading activity), and relative tax efficiency (because the funds inside the portfolio are tax efficient and turnover inside the portfolio is minimal).

While IFL's primary investment approach is passive, IFL may from time to time recommend tactical adjustments or selectively recommend actively managed positions where client-specific circumstances or market conditions warrant. Such recommendations may include adjustments to target asset class weights, sector tilts, or the use of actively managed funds where IFL believes the potential benefit justifies the additional cost or complexity. Tactical recommendations are made based on IFL's professional judgment and are not systematic or formulaic in nature. IFL does not guarantee that any tactical recommendation will outperform a purely passive approach, and clients should be aware that active and tactical positions may result in higher costs and do not assure better outcomes.

In contrast, active management involves a single manager or managers who employ some method, strategy or technique to construct a portfolio that is intended to generate returns that are greater than the broader market or a designated benchmark.

### **Non-discretionary Model**

All investment recommendations made by IFL are provided on a non-discretionary basis. IFL does not have authority to execute trades, make investment decisions, or otherwise act on a client's behalf without the client's prior review and approval of each transaction. Clients retain sole responsibility for implementing any investment recommendations made by IFL, including the timing and method of execution. IFL does not custody client assets. All client assets are held at qualified custodians selected independently by the client.

### **Material Risks Involved**

IFL provides investment advisory and financial planning services. **All investing strategies we offer involve risk and may result in a loss of your original investment which you should be prepared to bear.** Many of these risks apply equally to stocks, bonds, commodities, and any other investment or security. Material risks associated with our investment strategies are listed below.

**Market Risk:** Market risk involves the possibility that an investment's current market value will fall because of a general market decline, reducing the value of the investment regardless of the operational success of the issuer's operations or its financial condition.

**Active Management Risk:** Tactical and active investment recommendations involve judgment-based decisions that may not produce better outcomes than a purely passive investment strategy. There is no assurance that active or tactical positions will outperform relevant benchmark indices, and such positions may underperform over any given time period. Additionally, actively managed funds typically carry higher internal expenses than passive index funds, which may reduce net returns to the client.

**Implementation Risk:** Because IFL provides investment advice on a non-discretionary basis and clients are solely responsible for executing their own trades, there may be a delay between the time IFL makes a recommendation and the time the client implements it. Market conditions may change materially during any such delay, which could affect the outcome of the recommendation. IFL is not responsible for the

results of any recommendation that is implemented at a different time or price than that at which it was made.

### **Risks Associated with Securities**

Apart from the general risks outlined above which apply to all types of investments, specific securities may have other risks.

**Exchange Traded Funds** prices may vary significantly from the Net Asset Value due to market conditions. Certain Exchange Traded Funds may not track underlying benchmarks as expected. ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above (premium) or below (discount) their net asset value and an ETF purchased at a premium may ultimately be sold at a discount; (ii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are delisted from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. The Adviser has no control over the risks taken by the underlying funds in which the Clients invest.

**Mutual Funds** When a Client invests in open-end mutual funds or ETFs, the Client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the Client will incur higher expenses, many of which may be duplicative. In addition, the Client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives).

## Item 9: Disciplinary Information

### **Criminal or Civil Actions**

IFL and its management persons have not been involved in any criminal or civil action.

### **Administrative Enforcement Proceedings**

IFL and its management persons have not been involved in any administrative enforcement proceedings.

### **Self-Regulatory Organization Enforcement Proceedings**

IFL and its management persons have not been involved in any self-regulatory organization (SRO) proceedings.

## Item 10: Other Financial Industry Activities and Affiliations

### **Broker-Dealer Affiliation**

Neither IFL or its management persons is registered, or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

### **Other Affiliations**

Neither IFL or its management persons is registered, or have an application pending to register, as a futures commission merchant, commodity pool operator, commodity trading advisor, or an associated person of the foregoing entities.

### **Related Persons**

Neither IFL or its management persons have any relationship or arrangement with any outside financial industry related parties.

### **Recommendations or Selections of Other Investment Advisers**

IFL does not recommend or select other investment advisers for our clients.

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

As a fiduciary, our firm has a duty of utmost good faith to act solely in the best interests of each Client. Our Clients entrust us with their funds and personal information, which in turn places a high standard on our conduct and integrity. Our fiduciary duty is a core aspect of our Code of Ethics and represents the expected basis of all of our dealings. The firm also adheres to the Code of Ethics and Professional Responsibility adopted by the CFP® Board of Standards Inc., and accepts the obligation not only to comply with the mandates and requirements of all applicable laws and regulations but also to take responsibility to act in an ethical and professionally responsible manner in all professional services and activities.

### **Code of Ethics Description**

This Code of Ethics does not attempt to identify all possible conflicts of interest, and compliance with each of its specific provisions will not shield our firm or its access persons from liability for misconduct that violates a fiduciary duty to our Clients. A summary of the Code of Ethics' Principles is outlined below.

- Integrity - Access persons shall offer and provide professional services with integrity.
- Objectivity - Access persons shall be objective in providing professional services to Clients.
- Competence - Access persons shall provide services to Clients competently and maintain the necessary knowledge and skill to continue to do so in those areas in which they are engaged.
- Fairness - Access persons shall perform professional services in a manner that is fair and reasonable to Clients, principals, partners, and employers, and shall disclose conflict(s) of interest in providing such services.
- Confidentiality - Access persons shall not disclose confidential Client information without the specific consent of the Client unless in response to proper legal process, or as required by law.
- Professionalism - Access persons conduct in all matters shall reflect the credit of the profession.
- Diligence - Access persons shall act diligently in providing professional services.

We periodically review and amend our Code of Ethics to ensure that it remains current, and we require all firm access persons to attest to their understanding of and adherence to the Code of Ethics at least annually. Our firm will provide a copy of its Code of Ethics to any Client or prospective Client upon request.

### **Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest**

Neither our firm, its access persons, or any related person is authorized to recommend to a Client or effect a transaction for a Client, involving any security in which our firm or a related person has a material financial interest, such as in the capacity as an underwriter, adviser to the issuer, principal transaction, among others.

### **Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest**

Neither our firm or its related person purchases the same securities that are recommended to Clients.

### **Trading Securities At/Around the Same Time as Client's Securities**

Neither our firm or its related persons buys or sells securities for client accounts at or about the same time that we or a related person buys or sells the same securities for our own accounts.

## Item 12: Brokerage Practices

### **Factors Used to Select Custodians**

As a fee-only adviser providing non-discretionary investment advisory services, IFL does not execute trades on behalf of Clients and IFL does not custody client assets.

### **Brokerage for Client Referrals**

We receive no referrals from a custodian, broker-dealer or third party.

### **Clients Directing Which Broker/Dealer/Custodian to Use**

As a fee-only adviser providing non-discretionary investment advisory services, IFL does not execute trades on behalf of Clients and IFL does not custody client assets.

### **Aggregating (Block) Trading for Multiple Client Accounts**

Some investment advisers execute Client accounts on an aggregated basis as a way to lower expenses. As a fee-only adviser providing non-discretionary investment advisory services, IFL does not execute trades on behalf of Clients and IFL does not custody client assets. As a result, it is up to the Client to negotiate their own trading costs with their custodian.

### **Research and Other Soft-Dollar Benefits**

We do not have any soft-dollar arrangements with custodians.

## Item 13: Review of Accounts

### **Periodic Reviews**

Saidislom Israilov, Founder, CEO and CCO of IFL, and Maksat Stamakunov, Chief Investment Officer of IFL, will work with Clients to obtain current information regarding their assets and investment holdings. Saidislom Israilov reviews this information as part of IFL's financial planning services. Maksat Stamakunov reviews Client investment holdings and portfolio positioning as part of IFL's investment advisory services, including monitoring adherence to each Client's Investment Policy Statement and recommending adjustments where appropriate. IFL does not provide specific reports to Clients, other than financial plans and investment-related communications as agreed upon in the Client's Advisory Contract.

### **Triggers of Reviews**

Events that may trigger a special review would be unusual performance, addition or deletions of Client-imposed restrictions, excessive draw-down, volatility in performance, or buy and sell decisions from the firm or per Client's needs.

### **Review Reports**

Clients will receive trade confirmations from the custodian(s) for each transaction in their accounts as well as monthly or quarterly statements and annual tax reporting statements from their custodian showing all activity in the accounts, such as receipt of dividends and interest.

## Item 14: Client Referrals and Other Compensation

### **Compensation Received by Israilov Financial, LLC**

IFL is a fee-only firm that is compensated solely by its Clients. IFL does not receive commissions or other sales-related compensation.

### **Client Referrals from Solicitors**

IFL does not, directly or indirectly, compensate any person who is not advisory personnel for Client referrals.

## Item 15: Custody

IFL does not have custody of client funds or securities, and IFL does not deduct fees from client's assets.

## Item 16: Investment Discretion

IFL provides non-discretionary investment advisory services. All investment recommendations are made by IFL on a non-discretionary basis, meaning IFL does not have the authority to execute trades or make investment decisions on behalf of Clients without prior Client approval of each transaction. Clients retain full control over the implementation of any investment recommendations, including the timing and execution of all trades. IFL does not custody Client assets. All Client assets are held at qualified custodians independently selected by the Client.

## Item 17: Voting Client Securities

We do not vote Client proxies. Therefore, Clients maintain exclusive responsibility for: (1) voting proxies, and (2) acting on corporate actions pertaining to the Client's investment assets. The Client shall instruct the Client's qualified custodian to forward to the Client copies of all proxies and shareholder communications relating to the Client's investment assets. If the Client has any questions on a particular proxy vote, they may contact us at the number listed on the cover of this brochure.

In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward you any electronic solicitation to vote proxies.

## Item 18: Financial Information

We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to our Clients, nor have we been the subject of any bankruptcy proceeding. We do not have custody of Client funds or securities, except as disclosed in Item 15 above, or require or solicit prepayment of more than \$500 in fees six months or more in advance.

## Item 19: Requirements for State-Registered Advisers

### **Principal Officers**

Saidislom Israilov and Maksat Stamakunov serve as principals of IFL. Saidislom Israilov serves as Chief Executive Officer and Chief Compliance Officer ("CCO"). Maksat Stamakunov serves as Chief Investment Officer ("CIO"). Information about each principal's education, business background, and outside business activities can be found in their respective ADV Part 2B Brochure Supplements attached to this Brochure.

### **Outside Business**

All outside business information, if applicable, of IFL is disclosed in Item 10 of this Brochure.

### **Performance-Based Fees**

Neither IFL, Saidislom Israilov, nor Maksat Stamakunov is compensated by performance-based fees.

### **Material Disciplinary Disclosures**

No management person at IFL has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

### **Material Relationships That Management Persons Have With Issuers of Securities**

Neither IFL, Saidislom Israilov, nor Maksat Stamakunov have any relationship or arrangement with issuers of securities.

### **Business Continuity Plan**

IFL maintains a written Business Continuity Plan that identifies procedures related to an emergency or significant business disruptions, including the death of the investment adviser or any of its representatives.

### **Disclosure of Material Conflicts**

All material conflicts of interest under CCR Section 260.238(k) are disclosed regarding IFL, its representatives or any of its employees, which could be reasonably expected to impair the rendering of unbiased and objective advice.

## Item 1: Cover Page

### Israilov Financial, LLC

10870 N Stelling Road  
Cupertino, CA 95014  
917-626-3628

<https://www.israilovfinancial.com/>

### **Form ADV Part 2B – Brochure Supplement**

Dated March 31, 2026

*For*

### **Saidislom Israilov**

Founder, CEO and Chief Compliance Officer

This brochure supplement provides information about Saidislom Israilov that supplements the Israilov Financial, LLC (“IFL”) brochure. You should have received a copy of that brochure. Please contact Saidislom Israilov if you did not receive IFL’s brochure or if you have any questions about the contents of this supplement.

Additional information about Saidislom Israilov is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) which can be found using the identification number 6089397.

## Item 2: Educational Background and Business Experience

### Saidislom Israilov

Born: 1991

#### Educational Background

- 2024 – Continuing Education, Certified Financial Planner Program, Stockton University
- 2014 – Bachelors of Science in Applied Economics and Business Minor, Cornell University

#### Business Experience

- 05/2024 – Present, Israilov Financial, LLC, Founder, CEO and CCO
- 10/2023 – 05/2024 Sabbatical / Continuing Education
- 01/2019 – 10/2023, Charles Schwab, Corporate Development & Strategy Senior Manager
- 05/2017 – 01/2019, Levi Strauss, Corporate Development & Strategy Senior Analyst

#### Professional Designation(s)

##### **Certified Financial Planner (CFP®):**

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

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

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

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

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

### Item 3: Disciplinary Information

Saidislom Israilov has never been involved in an arbitration claim of any kind or been found liable in a civil, criminal, self-regulatory organization (SRO) proceedings, administrative proceedings, formal adjudications or other hearings.

### Item 4: Other Business Activities

Saidislom Israilov is not involved in any outside business activities.

### Item 5: Additional Compensation

Saidislom Israilov does not receive any economic benefit from any person, company, or organization, in exchange for providing Clients advisory services through IFL.

### Item 6: Supervision

Saidislom Israilov as Chief Compliance Officer of IFL, supervises the advisory activities of our firm. Saidislom Israilov is bound by and will adhere to the firm’s policies and procedures and Code of Ethics. Clients may contact Saidislom Israilov at the phone number on this brochure supplement.

### Item 7: Requirements for State Registered Advisers

Saidislom Israilov has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.

## Item 1: Cover Page

### Israilov Financial, LLC

10870 N Stelling Road  
Cupertino, CA 95014  
917-626-3628

<https://www.israilovfinancial.com/>

### **Form ADV Part 2B – Brochure Supplement**

Dated March 31, 2026

*For*

### **Maksat Stamakunov**

Portfolio Manager and Chief Investment Officer

This brochure supplement provides information about Maksat Stamakunov that supplements the Israilov Financial, LLC (“IFL”) brochure. You should have received a copy of that brochure. Please contact Saidislom Israilov if you did not receive IFL’s brochure or if you have any questions about the contents of this supplement.

Additional information about Maksat Stamakunov is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) which can be found using the identification number 8015100.

## Item 2: Educational Background and Business Experience

### **Maksat Stamakunov**

Born: 1992

#### **Educational Background**

- 2015 – MSc in Management with Project Management, BPP University
- 2013 – BA in Business Studies, Cardiff Metropolitan University

#### **Business Experience**

- 12/2024 – Present, Israilov Financial, LLC, Portfolio Manager and Chief Investment Officer
- 04/2024 – 11/2024 Sabbatical
- 08/2021 – 03/2024, Britannia Global Markets, Equity Analyst
- 08/2017 – 06/2021, Dolfin Financial UK, Financial Analyst

#### **Professional Designation(s)**

**Chartered Financial Analyst (CFA®):** The CFA charter is a graduate-level professional designation established in 1962 and awarded by CFA Institute. To earn the CFA charter, candidates must pass three sequential, six-hour examinations over two to four years. The three levels of the CFA Program test a wide range of investment topics, including ethical and professional standards, fixed-income analysis, alternative, and derivative investments, and portfolio management and wealth planning. In addition, CFA charterholders must have at least four years of acceptable professional experience in the investment decision-making process and must commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

## Item 3: Disciplinary Information

Maksat Stamakunov has never been involved in an arbitration claim of any kind or been found liable in a civil, criminal, self-regulatory organization (SRO) proceedings, administrative proceedings, formal adjudications or other hearings.

## Item 4: Other Business Activities

Maksat Stamakunov is not involved in any outside business activities.

## Item 5: Additional Compensation

Maksat Stamakunov does not receive any economic benefit from any person, company, or organization, in exchange for providing Clients advisory services through IFL.

## Item 6: Supervision

Saidislom Israilov as Chief Compliance Officer of IFL, supervises the advisory activities of Maksat Stamakunov. Clients may contact Saidislom Israilov at the phone number on this brochure supplement.

## Item 7: Requirements for State Registered Advisers

Maksat Stamakunov has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.