

# Item 1: Cover Page

## **Fintentional LLC**

1495 Dorchester Road

Birmingham, Michigan 48009

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

[www.fintentional.com](http://www.fintentional.com)

(248) 607-0672

Dated February 23, 2023

This Brochure provides information about the qualifications and business practices of Fintentional LLC, “Fintentional”. If you have any questions about the contents of this Brochure, please contact us at (248) 607-0672. 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.

Fintentional LLC is registered as an Investment Adviser with the State of MI. Registration of an Investment Adviser does not imply any level of skill or training.

Additional information about Fintentional 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 284829.

## Item 2: Material Changes

The last annual update of this Brochure was filed on January 20, 2023. The following changes have been made to this version of the Disclosure Brochure:

- There are currently no material changes to report. In the future, any material changes during the year will be reported here.

### Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure 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 Fintentional.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at <http://www.adviserinfo.sec.gov> by searching for our firm name or by our CRD number 284829.

You may also request a copy of this Disclosure Brochure at any time, by contacting us at (248) 607-0672.

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# Item 4: Advisory Business

## **Description of Advisory Firm**

Fintentional LLC is registered as an Investment Adviser with the State of MI. Fintentional LLC was founded in June 2016. Michael Palazzolo is the principal owner of Fintentional. We hold ourselves to a fiduciary standard, which means that we act with undivided loyalty in the best interest of our clients. As of December 31, 2022, Fintentional LLC reports \$762,440 discretionary Assets Under Management and \$10,357,014 in non-discretionary Assets Under Management.

## **Types of Advisory Services**

Fintentional provides fee only financial planning and investment advisory services to individuals and families. We collaboratively work with our clients to strategically develop and deploy each client's financial resources in support of their desired life.

The Comprehensive Financial Planning Program is designed for individuals seeking a long-term comprehensive financial planning and investment advisory relationship. The service is provided with an initial portion and related fee that is billed quarterly or monthly in arrears. We may occasionally provide ad hoc services on a fixed project hourly basis via the Limited Scope Project offering.

### **Comprehensive Financial Planning Program**

The Comprehensive Financial Planning Program is designed for those seeking a long-term relationship to develop, monitor and evolve your living financial plan including investments over time.

A complimentary introductory meeting will be held to determine the scope of the engagement. Upon engagement, Fintentional LLC will provide comprehensive financial planning services.

The goals and objectives of each client will be developed, prioritized, and captured during the onboarding phase consisting of "Get Organized" and "Priorities" meetings. The initial client priorities with timeline are mutually defined and a high-level plan is captured electronically in the collaborative financial planning software. A "Deep Dive" meeting is subsequently scheduled to address the first one or two high priority items.

Specific recommendations will be tailored to each client's unique situation and obligations. The implementation of the recommendations is always at the discretion of the client. The client is responsible for implementing or approving each recommendation.

Personalized guidance, implementation assistance and follow-up are provided. This includes email and impromptu video meeting and phone support. Follow up will occur to encourage

implementation of accepted recommendations.

Regularly scheduled reviews will take place to update priorities, decide on next items to address, and review accounts for rebalancing. Online access to your financial plan, document vault, and task list is provided. With proper authorization, we will interface with your other professionals such as estate attorneys or tax advisors.

### **List of Topics Covered Under the Comprehensive Financial Planning Program**

Business Planning, Cash Flow and Debt Management, College Savings, Employee Benefits Optimization, Estate Planning, Financial Goal Development, Insurance Review, Investment Analysis, Retirement Planning, Retirement Withdrawal Strategies, Risk Management, Tax Planning.

### **Investment Advisory Details**

The investment advisory service is part of the Comprehensive Financial Planning Program and is tailored to each client and based on your stated objectives, stage of life, and overall financial picture. The investment advice is focused on helping you determine and select the appropriate asset allocation (i.e. mix between equities and bonds) and specific investments while considering tax implications.

A buy, hold and rebalance strategy is recommended for most portfolios. Retirees will also receive a retirement withdrawal policy in conjunction with the investment strategy. Mutual funds and ETF's are recommended unless there are tax implications to selling current holdings. Low cost index funds are preferred where possible.

Each client can choose to Self-Manage their investment accounts or choose Investment Implementation Assistance to have Fintentional LLC implement recommended trades with your explicit permission (Non-Discretion). In either case, we do not monitor your accounts between scheduled reviews, have discretion over your accounts, or have custody of your assets.

### **Self-Managed**

Specific instructions for approved recommendations are provided on how to reallocate your accounts. Trades are never made on your behalf. Virtual or in person support may be provided to help you follow the instructions.

### **Investment Implementation Assistance**

If you would like help with your investment accounts, we will implement recommended trades on

your behalf after receiving your approval. This service does not apply to employer retirement accounts like 401(k), 403(b) and 457 plans. Under no circumstances will a member of Fintentional be given, or made aware of, your user id and password.

The client can select from service providers that provide a limited authority to have an advisor make trades on their behalf. This non-discretionary service does not include continuous supervision or management of the assets. See item 16 of Form ADV Part 2A for further information.

### **Limited Scope Project**

We provide hourly, as-needed advice to clients at our discretion on a fixed project basis. It is not our intention to offer such advice on a regular basis and is not considered comprehensive financial planning. This one-time service is designed to cover one or two topics from the List of Topics Covered Under the Comprehensive Financial Planning Program.

We discuss and agree upon the scope of each engagement at the time you request service. Each project includes:

- One or two 60 to 90-minute meetings.
- Customized Recommendations Report summarizing the discussion and corresponding Action Plan addressing topics discussed.
- 30 days of email support related to the topics addressed in your Action Plan starting at the conclusion of your second meeting.

Each engagement is concluded at the end of the 30-day email support window. We have no responsibility to provide advice between engagements. If a client chooses to engage Fintentional within one month of completion of a Limited Scope Project, any fees paid may be credited towards the Comprehensive Financial Planning Program.

### **Use of Third Party Managers, Outside Managers, or Sub-Advisors (TAMPs)**

We offer the use of Third Party Managers, Outside Managers, or Sub-Advisors (collectively, “TAMPs”) for portfolio management services. We assist Clients in completing the TAMPs’ investor profile questionnaire, selecting an appropriate asset allocation model, interacting with the TAMPs and conducting an ongoing review of the TAMPs’ investment offerings and investment selection. Our review process and analysis of TAMPs is further discussed in Item 8 of this brochure. Additionally, we will meet with the Client on a periodic basis to discuss changes in their personal or financial situation, suitability, and any new or revised restrictions to be applied to their account(s).

### **Tax Preparation & Tax Planning Assistance**

In certain cases we will recommend tax preparation and tax planning services to our comprehensive financial planning clients and will refer them to recommended third-party accounting and tax planning firms for the preparation and filing of client's federal and state tax returns.

In certain situations we will have the client sign an information sharing agreement allowing us to work with the client and the tax preparer to gather the necessary information, participate in meetings and phone calls, and provide additional support as needed, however, we will not act as the tax preparer or provide tax advice unless we are otherwise qualified to do so. We do not receive any compensation from third parties for recommending their services to our clients.

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

We offer the same suite of services to all of our clients. However, specific client financial plans and their recommendations are dependent upon the client profile which outlines each client's current situation (goals, income, tax levels, level of investment knowledge and risk tolerance levels). This information is used to construct a client specific financial plan including the recommendation of an investment portfolio that incorporates any client restrictions.

As part of any Investment Analysis conducted, we may recommend a specific passive investment portfolio made up primarily of low-cost mutual funds and ETF's as described in Item 8 of the Form ADV Part 2A. As part of the analysis, we can provide specific instructions on how to implement accepted investment recommendations on your own.

A client may request a recommended portfolio that retains positions including individual common stocks, corporate or municipal bonds and other pre-existing positions due to tax implications or excessive fees to liquidate. Clients retain full discretion over all implementation decisions and are free to accept or reject any recommendations we make.

### **Wrap Fee Programs**

We do not participate in wrap fee programs.

## **Item 5: Fees and Compensation**

Fintentional LLC charges for service with a flat fee via the Comprehensive Financial Planning Program or hourly via the Limited Scope Project offering. These fees are our only form of compensation. All fees are negotiable in certain cases at the discretion of Fintentional LLC.



## Comprehensive Financial Planning Program

The Comprehensive Financial Planning Program consists of an Initial Strategy fee and a Recurring Planning and Investment fee that is paid monthly or quarterly in arrears.

The Initial Strategy fee is for Client onboarding, data gathering, creating the initial client priorities with timeline, and presenting the initial high-level plan. This work will commence after the agreement is signed. The Initial Strategy fee invoice is generated after signing the agreement and typically due by the “Get Organized Meeting.” Therefore, the upfront portion of the fee will not be paid more than 6 months in advance.

The Comprehensive Financial Planning Program fee schedule is based upon the higher of Adjusted Gross Income and Net Worth as described in the table below. The fee will be recalculated every two years. Fee changes will only take place with the client’s approval.

Adjusted Gross Income	Net Worth	Initial Strategy	Monthly Planning and Investment	Quarterly Planning and Investment
Up to \$250,000	Up to \$2,000,000	\$1,100	\$250	\$750
\$250,000 up to \$400,000	\$2,000,000 up to \$5,000,000	\$1,250	\$300	\$900
Over \$400,000	\$5,000,000 up to \$10,000,000*	\$1,400	\$416. <sup>66</sup>	\$1,250

\* Fees for individuals or families with net worth greater than \$10,000,000 are negotiable based upon the scope of services required.

The Comprehensive Financial Planning Program can be terminated any time in writing or email. Any unearned Initial Strategy Fee’s will be returned within 20 days of receiving your notice. The refund will be calculated based upon the equivalent hourly fee earned, in 30-minute increments, prior to the termination notice. Any work completed and suitable for presentation will be provided to the client. Monthly or quarterly fees will not be refunded since they are paid in arrears. However, any future automatic payments will be cancelled upon receiving a termination notice.

## Limited Scope Project

The Limited Scope project is offered on a fixed fee basis at a hourly rate of \$300 for a Certified Financial Planner™ professional. An agreement outlining the total cost is provided. Projects exceeding the scope of effort will result in a negotiated follow up project.

Half of the agreed upon fee is due at the beginning of the engagement and the remainder is due at completion of the engagement. However, Fintentional will not bill an amount above \$500.00 more than 6 months in advance.

The Limited Scope Project can be terminated any time in writing or email prior to completion of the engagement. Any unearned fees will be refunded within 20 days. The refund will be calculated by subtracting any fees earned based upon the stated hourly rate in 30-minute increments. Any work completed and suitable for presentation will be provided to the client.

### **Methods of Payment**

Clients may choose to pay for their services via Electronic Funds Transfer (EFT), check, or credit card. Any client refunds will be made via EFT or check from Fintentional LLC. Return of prepaid fees will never involve a personal check, cash or money order from a member of the firm.

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

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.

Fees for tax preparation services are separate and in addition to our fees and will be billed by the recommended third party tax preparer or planner for any services rendered by them. At our discretion and on a case-by-case basis, we may absorb these fees associated with tax preparation and have them bill us directly.

Item 12 further describes the factors that we consider in selecting or recommending broker-dealers for client's transactions and determining the reasonableness of their compensation (e.g., commissions).

We 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.

## Item 7: Types of Clients

We provide financial planning and portfolio management services to individuals, and high net-worth individuals.

We do not have a minimum account size requirement.

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

When clients have us complete an Investment Analysis (described in Item 4 of this brochure) as part of their financial plan, our primary methods of investment analysis are fundamental, technical, cyclical and charting analysis.

**Fundamental analysis** involves analyzing individual companies and their industry groups, such as a company's financial statements, details regarding the company's product line, the experience, and expertise of the company's management, and the outlook for the company's industry. The resulting data is used to measure the true value of the company's stock compared to the current market value. The risk of fundamental analysis is that information obtained may be incorrect and the analysis may not provide an accurate estimate of earnings, which may be the basis for a stock's value. If securities prices adjust rapidly to new information, utilizing fundamental analysis may not result in favorable performance.

**Technical analysis** involves using chart patterns, momentum, volume, and relative strength in an effort to pick sectors that may outperform market indices. However, there is no assurance of accurate forecasts or that trends will develop in the markets we follow. In the past, there have been periods without discernible trends and similar periods will presumably occur in the future. Even where major trends develop, outside factors like government intervention could potentially shorten them.

Furthermore, one limitation of technical analysis is that it requires price movement data, which can translate into price trends sufficient to dictate a market entry or exit decision. In a trendless or erratic market, a technical method may fail to identify trends requiring action. In addition, technical methods may overreact to minor price movements, establishing positions contrary to overall price trends, which may result in losses. Finally, a technical trading method may underperform other trading methods when fundamental factors dominate price moves within a given market.

**Cyclical analysis** is a type of technical analysis that involves evaluating recurring price patterns and trends based upon business cycles. Economic/business cycles may not be predictable and may have

many fluctuations between long term expansions and contractions. The lengths of economic cycles may be difficult to predict with accuracy and therefore the risk of cyclical analysis is the difficulty in predicting economic trends and consequently the changing value of securities that would be affected by these changing trends.

**Charting analysis** involves the gathering and processing of price and volume information for a particular security. This price and volume information is analyzed using mathematical equations. The resulting data is then applied to graphing charts, which is used to predict future price movements based on price patterns and trends. Charts may not accurately predict future price movements. Current prices of securities may not reflect all information about the security and day-to-day changes in market prices of securities may follow random patterns and may not be predictable with any reliable degree of accuracy.

We may suggest the use of sub-advisers (“outside managers”). Our analysis of outside managers involve the examination of the experience, expertise, investment philosophies, and past performance of the outside managers 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 monitor the manager’s underlying holdings, strategies, concentrations and leverage as part of our overall periodic risk assessment. Additionally, as part of our due-diligence process, we survey the manager’s compliance and business enterprise risks. A risk of investing with an outside manager who has been successful in the past is that he/she may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in an outside manager’s portfolio. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the portfolio, making it a less suitable investment for our clients. Moreover, as we do not control the manager’s daily business and compliance operations, we may be unaware of the lack of internal controls necessary to prevent business, regulatory or reputational deficiencies.

## **Passive Investment Management**

We primarily practice passive investment management. Passive investing involves building portfolios that are comprised of various distinct asset classes. The asset classes are weighted in a manner to achieve a 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).

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. Academic research indicates most active managers underperform the market.

## **Material Risks Involved**

Investment recommendations may be made as part of the 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.

**Strategy Risk:** The Adviser's investment strategies and/or investment techniques may not work as intended.

**Small and Medium Cap Company Risk:** Securities of companies with small and medium market capitalizations are often more volatile and less liquid than investments in larger companies. Small and medium cap companies may face a greater risk of business failure, which could increase the volatility of the client's portfolio.

**Turnover Risk:** At times, the strategy may have a portfolio turnover rate that is higher than other strategies. A high portfolio turnover would result in correspondingly greater brokerage commission expenses and may result in the distribution of additional capital gains for tax purposes. These factors may negatively affect the account's performance.

**Limited markets:** Certain securities may be less liquid (harder to sell or buy) and their prices may at times be more volatile than at other times. Under certain market conditions we may be unable to sell or liquidate investments at prices we consider reasonable or favorable, or find buyers at any price.

**Concentration Risk:** Certain investment strategies focus on particular asset-classes, industries, sectors or types of investment. From time to time these strategies may be subject to greater risks of adverse developments in such areas of focus than a strategy that is more broadly diversified across a wider variety of investments.

**Interest Rate Risk:** Bond (fixed income) prices generally fall when interest rates rise, and the value may fall below par value or the principal investment. The opposite is also generally true: bond prices generally rise when interest rates fall. In general, fixed income securities with longer

maturities are more sensitive to these price changes. Most other investments are also sensitive to the level and direction of interest rates.

**Legal or Legislative Risk:** Legislative changes or Court rulings may impact the value of investments, or the securities' claim on the issuer's assets and finances.

**Inflation:** Inflation may erode the buying-power of your investment portfolio, even if the dollar value of your investments remains the same.

## **Risks Associated with Securities**

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

**Commercial Paper** is, in most cases, an unsecured promissory note that is issued with a maturity of 270 days or less. Being unsecured the risk to the investor is that the issuer may default.

**Common stocks** may go up and down in price quite dramatically, and in the event of an issuer's bankruptcy or restructuring could lose all value. A slower-growth or recessionary economic environment could have an adverse effect on the price of all stocks.

**Corporate Bonds** are debt securities to borrow money. Generally, issuers pay investors periodic interest and repay the amount borrowed either periodically during the life of the security and/or at maturity.

Alternatively, investors can purchase other debt securities, such as zero-coupon bonds, which do not pay current interest, but rather are priced at a discount from their face values and their values accrete over time to face value at maturity. The market prices of debt securities fluctuate depending on such factors as interest rates, credit quality, and maturity. In general, market prices of debt securities decline when interest rates rise and increase when interest rates fall. The longer the time to a bond's maturity, the greater its interest rate risk.

**Bank Obligations** including bonds and certificates of deposit may be vulnerable to setbacks or panics in the banking industry. Banks and other financial institutions are greatly affected by interest rates and may be adversely affected by downturns in the U.S. and foreign economies or changes in banking regulations.

**Municipal Bonds** are debt obligations generally issued to obtain funds for various public purposes, including the construction of public facilities. Municipal bonds pay a lower rate of return than most other types of bonds. However, because of a municipal bond's tax-favored status, investors should compare the relative after-tax return to the after-tax return of other bonds, depending on the investor's tax bracket. Investing in municipal bonds carries the same general risks as investing in bonds in general. Those risks include interest rate risk, reinvestment risk, inflation risk, market risk, call or redemption risk, credit risk, and liquidity and valuation risk.

**Options and other derivatives** carry many unique risks, including time-sensitivity, and can result in

the complete loss of principal. While covered call writing does provide a partial hedge to the stock against which the call is written, the hedge is limited to the amount of cash flow received when writing the option. When selling covered calls, there is a risk the underlying position may be called away at a price lower than the current market price.

**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.

**Investment Companies Risk.** When a client invests in open end mutual funds or ETFs, the client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the client will incur higher expenses, many of which may be duplicative. In addition, the client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives). ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value; (ii) the ETF may employ an investment strategy that utilizes high leverage ratios; or (iii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. The Adviser has no control over the risks taken by the underlying funds in which client's invest.

## Item 9: Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of the intentional or the integrity of our management. We have no information applicable to this Item.

## Item 10: Other Financial Industry Activities and Affiliations

Michael Palazzolo currently does not participate in other financial industry activities and is not affiliated with other financial firms.

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

As a fiduciary, our firm and its associates have 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.

This code does not attempt to identify all possible conflicts of interest, and literal compliance with each of its specific provisions will not shield associated persons from liability for personal trading or other conduct that violates a fiduciary duty to advisory clients. A summary of the Code of Ethics' Principles is outlined below.

- Integrity - Associated persons shall offer and provide professional services with integrity.
- Objectivity - Associated persons shall be objective in providing professional services to clients.
- Competence - Associated 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 - Associated 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 - Associated 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 - Associated persons' conduct in all matter shall reflect credit of the profession.
- Diligence - Associated persons shall act diligently in providing professional services.

We will, upon request, promptly provide a complete code of ethics. Please email Michael Palazzolo, Chief Compliance Officer, at [mike@fintentional.com](mailto:mike@fintentional.com) to request a copy of the document.

Our firm and its "related persons" (associates, their immediate family members, etc.) may buy or sell securities the same as, similar to, or different from, those we recommend to clients for their accounts. The securities previously mentioned are limited to open ended mutual funds. A recommendation made to one client may be different in nature or in timing from a recommendation made to a different client. Clients often have different objectives and risk tolerances. At no time, however, will our firm or any related party receive preferential treatment over our clients.

In an effort to reduce or eliminate certain conflicts of interest involving the firm or personal trading, our policy may require that we restrict or prohibit associates' transactions in specific securities transactions. Any exceptions or trading pre-clearance must be approved by our Chief Compliance



Officer in advance of the transaction in an account, and we maintain the required personal securities transaction records per regulation.

## Item 12: Brokerage Practices

### **Factors Used to Select Custodians and/or Broker-Dealers**

Fintentional LLC does not have any affiliation with Broker-Dealers. Specific custodian recommendations are made to client based on their need for such services. We recommend custodians based on the reputation and services provided by the firm.

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

We currently receive soft dollar benefits by nature of our custodian relationship with TD Ameritrade Institutional, Division of TD Ameritrade, Inc., member FINRA/SIPC.

#### **2. Brokerage for Client Referrals**

We receive no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

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

As a fee only financial planner, we do not have a concern over which custodian or broker-dealer a client may choose whether you Self Manage or choose Investment Implementation Assistance. Pros and cons of different custodians will be provided. The client will be made aware that some custodians may charge a client more for trades or execution.

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

Fintentional is not engaged in continuous investment supervisory services, nor do we have discretionary authority over accounts and, therefore, aggregating trades on behalf of client accounts will not be conducted. Since transactions are completed independently at a service provider of the client's choice, the client may potentially pay more for their transaction or experience wider price spreads than accounts where trades have been aggregated.

### **The Custodian and Brokers We Use (TD Ameritrade)**

Fintentional participates in TD Ameritrade's institutional customer program and may recommend TD Ameritrade to clients for custody and brokerage services. There is no direct link between Fintentional's participation in the program and the investment advice it gives to its clients, although Fintentional receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate client statements and

confirmations; research related products and tools; consulting services; access to a trading desk serving Fintentional participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts); the ability to have advisory fees deducted directly from client accounts; access to an electronic communications network for client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to Fintentional by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by Fintentional's related persons. Some of the products and services made available by TD Ameritrade through the program may benefit Fintentional but may not benefit its client accounts. These products or services may assist Fintentional in managing and administering client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help Fintentional manage and further develop its business enterprise. The benefits received by Fintentional or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, Fintentional endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by Fintentional or its related persons in and of itself creates a potential conflict of interest and may indirectly influence Fintentional's choice of TD Ameritrade for custody and brokerage services.

## **The Custodian and Brokers We Use (Betterment)**

Fintentional does not maintain custody of your assets that we manage, although we may be deemed to have custody of your assets if you give us the authority to withdraw advisory fees from your account (see Item 15—Custody, below). Your assets must be maintained in an account at a "qualified custodian," generally a broker-dealer or bank. We may recommend that our Clients use MTG, LLC dba Betterment Securities ("Betterment Securities"), a registered broker-dealer, member SIPC, as the qualified custodian. We are independently owned and operated and are not affiliated with Betterment Securities. Betterment Securities will hold your assets in a brokerage account and buy and sell securities when we and/or you instruct them to. While we may recommend that you use Betterment Securities as custodian/broker, you will decide whether to do so and will open your account with Betterment Securities by entering into an account agreement directly with them. We do not open the account for you, although we may assist you in doing so. If you do not wish to place your assets with Betterment Securities, then we cannot manage your account on Betterment For Advisors (defined below).

### **Your Brokerage and Custody Costs**

For our Clients' accounts that Betterment Securities maintains, Betterment Securities generally

does not charge you separately for custody services but is compensated as part of the Betterment For Advisors (defined below) platform fee, which is a percentage of the dollar amount of assets in the account in lieu of commissions. We have determined that having Betterment Securities execute trades is consistent with our duty to seek "best execution" of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above (see "Factors Used to Select Custodians and/or Broker-Dealers").

#### Services Available to Us via Betterment For Advisors

Betterment Securities serves as broker-dealer to Betterment For Advisors, an investment and advice platform serving independent investment advisory firms like us ("Betterment For Advisors"). Betterment For Advisors also makes available various support services which may not be available to Betterment's retail customers. Some of those services help us manage or administer our Clients' accounts, while others help us manage and grow our business. Betterment For Advisors' support services are generally available on an unsolicited basis (we don't have to request them) and at no charge to us. Following is a more detailed description of Betterment For Advisors' support services:

1. **SERVICES THAT BENEFIT YOU.** Betterment For Advisors includes access to a range of investment products, execution of securities transactions, and custody of Client assets through Betterment Securities. Betterment Securities' services described in this paragraph generally benefit you and your account.
2. **SERVICES THAT MAY NOT DIRECTLY BENEFIT YOU.** Betterment For Advisors also makes available to us other products and services that benefit us, but may not directly benefit you or your account. These products and services assist us in managing and administering our Clients' accounts, such as software and technology that may:
  - a. Assist with back-office functions, recordkeeping, and Client reporting of our Clients' accounts.
  - b. Provide access to Client account data (such as duplicate trade confirmations and account statements).
  - c. Provide pricing and other market data.
  - d. Assist with back-office functions, recordkeeping, and Client reporting.
3. **SERVICES THAT GENERALLY BENEFIT ONLY US.** By using Betterment For Advisors, we will be offered other services intended to help us manage and further develop our business enterprise. These services include:
  - a. Educational conferences and events.
  - b. Consulting on technology, compliance, legal, and business needs.
  - c. Publications and conferences on practice management and business succession.

#### Our Interest in Betterment Securities' Services

The availability of these services from Betterment For Advisors benefits us because we do not have to produce or purchase them. In addition, we don't have to pay for Betterment Securities' services. These services may be contingent upon us committing a certain amount of business to Betterment Securities in assets in custody. We may have an incentive to recommend that you maintain your account with Betterment Securities, based on our interest in receiving Betterment For Advisors and Betterment Securities' services that benefit our business rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a potential conflict of interest. We believe, however, that our selection of Betterment Securities as custodian and broker is in the best interests of our Clients. Our selection is primarily supported by the scope, quality, and price of Betterment Securities' services and not Betterment For Advisors and Betterment Securities' services that benefit only us.

## Item 13: Review of Accounts

### **Comprehensive Financial Planning Program**

Periodic financial check-ups or reviews will occur up to four times a year, but not less than annually. See Item 4 in this Form ADV Part 2 for more information.

Agreed upon, non-periodic reviews, may also take place throughout the year with respect to recommendation follow up and other client needs.

Clients may also initiate a non-periodic review when they anticipate or have experienced significant changes in their financial situation.

Michael Palazzolo, President and COO of Fintentional, will conduct all reviews. Michael will work with clients to obtain current information regarding any changes to their situation including updated investment holdings since Fintentional does not continuously monitor investment accounts. The information will be reviewed and a modified plan with new or updated recommendations may result. Clients who have implemented investment recommendations on their own, or with assistance, should review the account statements provided by their custodian for accuracy and clarity on an ongoing basis.

### **Limited Scope Project**

The engagement for clients opting for a Limited Scope Project is complete when the thirty-day support window is closed. No further account reviews will take place. Clients who have implemented investment recommendations should review the account statements provided by their custodian for accuracy and clarity on an ongoing basis.

# Item 14: Client Referrals and Other Compensation

We receive a non-economic benefit from Betterment For Advisors and Betterment Securities in the form of the support products and services it makes available to us and other independent investment advisors whose Clients maintain their accounts at Betterment Securities. These products and services, how they benefit us, and the related conflicts of interest are described above (see Item 12—Brokerage Practices). The availability to us of Betterment For Advisors and Betterment Securities' products and services is not based on us giving particular investment advice, such as buying particular securities for our Clients.

# Item 15: Custody

Fintentional does not accept custody of client funds.

# Item 16: Investment Discretion

We do not provide ongoing discretionary investment management services. The client has the final decision on whether or not to proceed with any investment recommendations.

Clients using the Investment Implementation Assistance Service may authorize Fintentional to execute the sale and/or purchase of investments on a non-discretionary basis. Nondiscretionary refers to the requirement to obtain your express permission and approval, on each individual trade. Although you may wish to sign a written Limited Power of Attorney with your service provider, your Financial Planning Agreement specifically prohibits us from making trades in client accounts without having obtained agreement on the trade beforehand.

Advisor will have the discretion to facilitate the selection of, and changes to, the Betterment For Advisors portfolio allocation. Betterment For Advisors provides software tools for advisors to facilitate the purchase and sale of securities in the Client's accounts, including the amounts of securities to be bought and sold to align with the Client's goals and risk tolerance, through a series of 101 incremental model portfolio allocations ranging from 0% to 100% in equities.

## **Limited Power of Attorney**

A limited power of attorney is a trading authorization. Clients often sign a limited power of attorney with their service provider so that we may execute the trades that the client has approved.

## Item 17: Voting Client Securities

Fintentional does not provide discretionary investment management services and does not vote client securities. 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 would like our opinion 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

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about our financial condition. We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to clients, and we have not been the subject of a bankruptcy proceeding.

We do not have custody of client funds or securities or require or solicit prepayment of more than \$500 in fees per client six months in advance.

# Item 19: Requirements for State-Registered Advisers

Michael Palazzolo

Born: 1970

## Educational Background

- 2009 – Master's Certificate - Personal Financial Planning, Oakland University
- 1996 – MS Computer Science and Engineering, Oakland University
- 1992 – BS Computer Science w/Management Minor, Oakland University

## Business Experience

- 07/2016 – Present, Fintentional LLC, President and CCO
- 07/2011 – 05/2016, Portfolio Solutions, LLC, Financial Advisor/Senior Investment Specialist
- 03/2007 – 07/2011, GreenPath Debt Solutions, Consumer Credit and Housing Counselor
- 11/2003 – 03/2007, Ford Motor Company, Senior Software Engineer

## Professional Designations, Licensing & Exams

**CERTIFIED FINANCIAL PLANNER™, CFP®** and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 68,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- **Education** – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning

subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;

- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- **Experience** – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- **Ethics** – Agree to be bound by CFP Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- **Continuing Education** – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- **Ethics** – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

### **Other Business Activities**

Michael Palazzolo is not involved with outside business activities.

### **Performance Based Fees**

Please refer to Item 6 of this brochure.

### **Material Disciplinary Disclosures**



No management person at Fintentional LLC 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**

Fintentional LLC, nor Michael Palazzolo, have any relationship or arrangement with issuers of securities.

Fintentional LLC

1495 Dorchester Road

Birmingham, MI 48009

(248) 294-0783

## Form ADV Part 2B – Brochure Supplement

*For*

**Michael Palazzolo**

President, and Chief Compliance Officer

Dated January 2023

This brochure supplement provides information about Michael Palazzolo that supplements the Fintentional LLC (“Fintentional”) brochure. A copy of that brochure precedes this supplement. Please contact Michael Palazzolo if the Fintentional brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Michael Palazzolo is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2: Educational Background and Business Experience

Please refer to Item 19 of the Form ADV Part 2A.

## Item 3: Disciplinary Information

Please refer to Item 19 of the Form ADV Part 2A.

## Item 4: Other Business Activities

Please refer to Item 19 of the Form ADV Part 2A.

## Item 5: Additional Compensation

Michael Palazzolo does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through Fintentional.

## Item 6: Supervision

Michael Palazzolo, as President and Chief Compliance Officer of Fintentional, is responsible for supervision. He may be contacted at the phone number on this brochure supplement.

## Item 7: Requirements for State Registered Advisers

1. Michael Palazzolo has NOT been involved in any of the events listed below.
  - a. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
    - i. An investment or an investment-related business or activity;
    - ii. Fraud, false statements, or omissions;
    - iii. Theft, embezzlement, or other wrongful taking of property;
    - iv. Bribery, forgery, counterfeiting, or extortion; or

- v. Dishonest, unfair, or unethical practices.
  - b. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
    - i. An investment or an investment-related business or activity;
    - ii. Fraud, false statements, or omissions;
    - iii. Theft, embezzlement, or other wrongful taking of property;
    - iv. Bribery, forgery, counterfeiting, or extortion; or
    - v. Dishonest, unfair, or unethical practices.
2. Michael Palazzolo has NOT been the subject of a bankruptcy petition at any time.