

**Part 2A of Form ADV: Firm Brochure**

**Item 1: Cover Page**  
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**November 21, 2013**

This brochure provides information about the qualifications and business practices of Finom Financial LLC (Finom). If you have any questions about the contents of this brochure, please contact us at 312-281-5479 or [info@finom.com](mailto:info@finom.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.

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

## **Item 2: Material Changes**

Since the last annual update of our Firm Brochure, we have the following material changes to report:

On April 8, 2013, Finom LLC, the sole direct owner of Finom Financial LLC, was merged with and into Finom, Inc., a Delaware Corporation, with Finom Inc. as the surviving entity.

On April 16, 2013, Rohan Monga resigned from the management of Finom. He remains an indirect owner of Finom Financial LLC, through his single member limited liability company.

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#### **Item 4: Advisory Business**

Finom Financial LLC (“Finom,” “we,” “us,” “our,” etc.) is an SEC registered investment adviser that was founded in July 2011. Finom is solely owned by Finom Inc., which is owned by David Gomel, Aziz Lalljee and Rohan Monga through their single member limited liability companies. David Gomel and Aziz Lalljee are the firm’s officers.

Finom provides information on certain characteristics and performance of selected SEC and State registered investment advisers (“RIA”) to persons who may be prospective clients of these RIAs. Using financial algorithms, we strive to objectively assess the risk-adjusted performance of RIAs with whom we have entered into solicitation agreements. For an RIA to be able to join Finom’s platform, it must provide client-level holdings information to us for analysis. As part of our RIA review process, we will review disclosure documents provided to us by the RIAs for any disciplinary or legal matters. RIAs that provide us performance data and disclosures, who agree to have their professional and investing backgrounds inspected and their performance history simulated and assessed by us, and who agree to meet with persons to whom we provide introductions per our solicitation agreement with the RIA, are included on our platform. RIAs do not pay us to join our platform nor are they clients of Finom. The RIAs that are part of our platform and are chosen by you to be their investment management firm, compensate us through a portion of the management fees you pay to the RIA for investment management services they provide to you. See Item No. 5: Fees and Compensation, within this brochure.

Based on your responses to our online questionnaire and your investment criteria and risk-tolerance (either derived from your answers to the questionnaire or indicated directly), we provide you with a list of unnamed RIAs for your review. The names of specific RIAs will not be provided to you until you choose an RIA based solely on your review of the RIA’s statistical and other information which we provided to you and we have a signed solicitation agreement in place with said RIA. We will then provide the RIA your information for them to make direct contact with you. You may then choose to enter into an investment advisory agreement with one or more RIAs. You will receive a copy of our Brochure and the Brochure of the selected RIA prior to entering into an investment advisory agreement with said chosen RIA. The Brochure of the RIA chosen by you should be carefully reviewed by you prior to making a selection.

Our business is limited to these activities. Finom does not manage, take custody of, or provide asset allocation advice on your assets or those of anyone else.

#### **Item 5: Fees & Compensation**

You do not pay Finom for its services. Rather, Finom generates revenue in its capacity as a solicitor to RIAs with whom we have solicitation agreements and who have entered into an investment advisory agreement with you.

In the event that you enter into an investment advisory agreement with an RIA sourced through Finom, the RIA will pay us for our solicitation services generally based on the pricing schedule as follows:

RIA pays us on an annual basis between 10 and 20 bps of the total assets under management by the selected RIA for the lifetime of your/RIA relationship. Finom bills the RIA quarterly, in arrears, based on the total assets under management in your account with the RIA as of each quarter. The following schedule applies to these types of accounts:

- The first \$500,000 at 20 bps
- Between \$500,000 and \$1,000,000 at 15 bps
- Above \$1,000,000 at 10bps

For example, if \$2,000,000 in assets is managed in your account by an RIA as a result of Finom's online solicitation or introduction, the RIA will be billed by us as follows:

- $\$500,000 \times 20\text{bps} = \$1,000$
- $\$500,000 \times 15\text{bps} = \$750$
- $\$1,000,000 \times 10\text{bps} = \$1,000$
- Total annual payment = \$2,750
- Billed quarterly at \$687.50

We reserve the right to negotiate alternative fee structures with an RIA on a case-by-case basis.

If you open subsequent accounts with the RIA or any of your related persons of the client open an account with the RIA, we are compensated on the same basis by the RIA for such accounts.

In the event that you close an account with an RIA, our solicitation agreement with the RIA vis-à-vis your account will cease as of the date of account termination.

You should refer to the RIA's brochure as to the fees you will be charged by the RIA for its services as well as disclosure about transaction costs charged to your account with the RIA (*e.g.*, custodial fees, mutual fund expenses).

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

We do not charge performance-based fees nor enter into side-by-side management arrangements.

#### **Item 7: Types of Persons Provided Services**

Finom typically provides informational services to individuals and small institutions. Finom has no minimum account size requirements for persons opening or maintaining an

account with selected RIAs, except in so far as a featured RIA may have its own account minimum requirement.

For example, Finom would not display to a person who has \$250,000 in assets for management information relating to an RIA that has specified a minimum account size of \$500,000.

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

Our method of analysis is limited to our proprietary analysis of the RIA's holdings data using financial algorithms and other disclosure and practice information provided to us by the RIAs. We rely on generally available market data as well as the information provided by the RIA to us to inform our analysis of the RIA.

Finom seeks to feature RIAs that fit your investment management needs and circumstances. To that end, Finom relies on certain criteria to screen RIAs, which may include your geographic location and proximity preference, account size, risk tolerance, or preferences specified as constraints by you.

Finom displays and rates the screened list of RIAs in order of their risk-adjusted simulated performance, assessed as per our proprietary methodologies. Finom's process for assessing risk-adjusted performance of an RIA incorporates the following: (a) Finom strives to capture your risk tolerance either through a questionnaire completed on-line by you, or as indicated directly by you on our listing page; (b) Finom analyzes portfolios of each RIA, dividing them into risk clusters; and (c) Finom then attempts to link your risk profile to a matching risk cluster of each appropriate RIA on the platform. We display and rate RIAs based on the (risk-adjusted) returns of the cluster deemed to be a match with your risk profile. Our process attempts to simulate how the assets of an individual client with a certain risk tolerance might have fared, after estimated fees, with a specific RIA over a specific holding period. Note that the same RIA may have different ratings for individuals with different risk profiles and different asset sizes.

Finom also attempts to assess each RIA's holdings and/or simulated performance within different investment categories and sub-asset classes (very specific definitions well beyond the typical equity/fixed income/cash), and may further score RIAs on specific characteristics relating to its investment management practice or performance (for example, Breadth of Services, or Portfolio Customization) relative to other RIAs on the platform.

Further, Finom features the RIA in the context of certain other available information (taken from public disclosures (Form ADV filings) of the RIA and disclosures made to Finom by the RIA). This information typically includes estimates fees, professed investing style and approach, investing tenure, education, and experience of the RIA or of its principles or representatives.

You are free to choose specific RIAs for contact from the generated list based solely on your review of the statistical and other information of RIAs on our platform. Once you

have chosen the RIA(s), we inform the selected RIA(s) and provide them with your name and basic contact information for their contact purposes. The RIA then contacts you and offers its investment advisory services directly, without Finom's involvement.

Finom bears no ongoing obligation to monitor the practice or performance of any RIA you may choose to meet or with whom you may enter into an investment advisory management relationship.

As stated earlier, Finom does not manage, take custody of, or provide asset allocation advice on any of your assets. The investment strategies and risks of loss are unique to the selected RIA relationship and you should review this Item 8 in the selected RIA's brochure.

Note: all RIA measures and ratings provided by Finom are internally generated by Finom on the basis of information provided by the RIAs with respect to their client holdings data and as per Finom's proprietary methodologies. The information provided to Finom by the RIA may or may not be representative of the types or names of holdings that the RIA may recommend to you as a client. While we strive to accurately and objectively (Finom is not related to any of the RIAs that it includes on its platform) present RIA information, Finom does not make any representations on behalf of any RIA, and does not guarantee, either explicitly or implicitly, the performance of any RIA. The RIA measures and ratings provided by Finom are "hypothetical". Consequently, you should view them only as one possible method to help you select a RIA, and are not intended to replicate or represent the possible performance by the RIA while managing the assets in your account.

### **Item 9: Disciplinary Information**

We are required to disclose any and all material facts regarding any legal or disciplinary events that would be material to your evaluation of Finom or the integrity of our management. As such, we are advising you that neither Finom nor any of its supervised persons have been subject to any legal or disciplinary events which would require disclosure.

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

Finom has no other financial industry activities or affiliations at this time.

### **Item 11: Code of Ethics and Personal Trading**

Finom has adopted a comprehensive Code of Ethics for all employees which addresses Standards of Business, Prohibition Against Insider Trading, Personal Securities Transactions, Gifts and Entertainment, and Customer Privacy. A copy of this Code will be provided upon request.

**Item 12: Brokerage Practices**

We do not enter securities orders for you and therefore have no brokerage practices to describe.

**Item 13: Review of Accounts**

We do not review your account as such account is maintained with and reviewed by the RIA you select. You should review Item 13 of the RIA's brochure.

**Item 14: Referrals and Other Compensation**

We do not compensate any person for referrals.

**Item 15: Custody**

We do not maintain custody of your funds or securities. You should refer to Item 15 in the RIA's brochure as to whether it maintains custody of your funds or securities.

You will not receive any account statements from us but rather such statements should be provided to you from the custodian of the RIA or the RIA itself.

**Item 16: Investment Discretion**

We do not have investment discretion over your assets. Such investment discretion is with the RIA with whom you enter into an investment management arrangement. You should review Item 16 in the RIA's brochure.

**Item 17: Voting Securities**

We do not vote proxies for you. Your RIA may or may not vote proxies for you based on the investment management agreement between you and the RIA. You should review Item 17 in the RIA's brochure.

**Item 18: Financial Information**

Finom has no financial commitment that impairs its ability to meet its contractual commitments, and has not been the subject of a bankruptcy proceeding.



## **Part 2B of Form ADV: Brochure Supplement**

## **Brochure Supplement – Aziz Lalljee**

### **Item 1: Cover Page**

Aziz Lalljee  
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November 21, 2013

This supplement provides information about Aziz Lalljee that supplements Finom's brochure. You should have received a copy of that brochure. Please contact Aziz Lalljee at the address or telephone number above if you did not receive the Finom brochure or if you have any questions about the contents of this supplement.

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

**Name:** Aziz Lalljee, Co-Chief Executive Officer

**Year of Birth:** 1985

### **Formal Education after High School:**

M.B.A., The University of Chicago Booth School of Business, Chicago, IL  
08/2010 - 06/2012

B.S., Economics, University of Pennsylvania, The Wharton School, Philadelphia, PA  
09/2003 – 06/2007

B.A., History, University of Pennsylvania, School of Arts and Sciences,  
Philadelphia, PA 09/2003 - 06/2007

### **Business Background for Preceding Five Years:**

Finom, Chicago, Illinois, Co-Founder and Managing Partner, 11/2010 – Present

Tamarix Capital, New York, New York, Summer Associate, 05/2010 – 08/2010

Navigant Consulting, Philadelphia, Pennsylvania, Senior Consultant,  
08/2007 – 02/2010

## **Item 3. Disciplinary Information**

None.

## **Item 4. Other Business Activities**

Mr. Lalljee does not engage in outside business activities that conflicts with his responsibilities at Finom.

## **Item 5. Additional Compensation**

Mr. Lalljee does not receive material economic benefit for advisory services other than fees generated from RIA's that you engage.

## **Item 6. Supervision**

Mr. Lalljee is Chief Compliance Officer and Co-Chief Executive Officer of Finom. His work is performed in consultation with David Gomel, Co-Chief Executive Officer of Finom.

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

N/A