

Form ADV Part 2A Disclosure Brochure



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**This brochure provides information about the qualifications and business practices of Muntz Financial, LLC. If you have any questions about the contents of this brochure, please contact us at 215-283-1933 and/ or [David@muntzfinancial.com](mailto:David@muntzfinancial.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 Muntz Financial also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

**Muntz Financial is a Registered Investment Advisor. This registration does not imply a certain level of skill or training, by itself. Review this brochure, in full, for an explanation of our competencies.**

## Item 2 Material Changes

The following material changes have occurred from the last annual updating amendment on March 31, 2024 of Muntz Financial, LLC:

- Muntz Financial, LLC is registered with the Securities and Exchange Commission.
- Disciplinary Information in Item 9 has been updated.

Material changes relate to Muntz Financial LLC's policies, practices or conflicts of interest.

Item 3

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#### Item 4 Advisory Business

Muntz Financial was founded by David M. Muntz, C(k)P, CRPC, AIF in December of 2007. David is the sole owner of the Advisor and serves as the President. Z.

Muntz Financial operates as a fee-only investment advisor, charging a negotiated fee in lieu of commission to our clients based on their Assets Under Management. We manage our client's positions and portfolios on an ongoing basis and tailor our advice to each individual client, participant or company's needs based upon the individual goals, objectives, time horizon, and risk tolerance of each client. In addition, we incorporate our client's thoughts and opinions in our recommendation and offer significant flexibility for the imposition of restrictions on individual holdings.

Muntz Financial advises our clients on a broad range of investment securities, vehicles and products. Generally, these include, but are not limited to:

- Individual Stocks  
(Equities) Exchange  
Listed
- Individual Bonds (Fixed Income) US Government and Corporate Issued
- Equity Options
- Mutual Funds
- Exchange Traded Funds and Notes
- Foreign Exchanges (FOREX)
- Variable Annuities
- Certificates of Deposit
- Municipal Securities
- Limited Partnerships
- Private Equity

Our method of analysis includes Fundamental, Technical, Cyclical and Charting. The main sources of information that we use include Research Materials prepared by Independent Analysts, Corporate Rating Services, Annual Reports, Prospectuses, SEC Filings, Company Press Releases and Financial Newspapers and Magazines.

The investment Strategies used to implement any investment advice given to our clients include:

- Long Term Purchases (held at least one year)
- Short Term Purchases (held less than one year)
- Trading (held less than 30 days)
- Margin Transactions and Option Writing and/or purchasing

As of 09/03/2024, Muntz Financial manages approximately \$154,350,430 in Discretionary Assets, and approximately \$406,816 in Non-Discretionary Assets, totaling \$154,757,246 in assets under management.

Item 5 Fees and Compensation

Muntz Financial charges clients a fee of 1% based on the market value of the assets under management annually. These fees are negotiable, and the final charged fee will be attached as Exhibit II of the Investment Advisory Contract. Fees are paid monthly in arrears, and clients may terminate their account with ten (10) days written notice. Clients may terminate their accounts without penalty, for full refund, within five (5) business days of signing the advisory contract.

Item 6 Performance-Based Fees

Muntz Financial does not currently charge performance-based fees.

## Item 7 Types of Clients

Muntz Financial generally provides investment advice to the following types of clients:

- Individuals
- Qualified or Accredited Investors
- Trusts
- Estates
- Defined Benefit Plans
- Defined Contribution Plans
- Corporations
- Private Funds

Muntz Financial does not have a minimum account size threshold.

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

**Method of Analysis**, as stated in Item 4, Page 4

**Investment Strategies (Standard Fee-Based)**

Investing in securities involves the risk of loss that clients should be prepared to bear.

Generally, our Investment Strategy utilizes a Core-Satellite approach to investing. Whereas the primary concentration of an advisory client's account will be invested in a Core portfolio designed to meet their specific objectives and risk tolerance. Our Core portfolios include Preservation of Principal, Conservative, Moderate, Growth and Enhanced Growth. In an effort to personalize some client accounts, we incorporate additional 'satellite' positions using secular, cyclical or individual equity or fixed income positions. The secular and/ or cyclical positions are accomplished primarily through Exchange Traded Funds/ Notes or Mutual Funds.

Private Fund Investing – When engaged by a private fund, Muntz Financial will manage the assets in accordance with the funds primary objective. This management may differ significantly from fund to fund or from our traditional investment management philosophy described above.

## Item 9 Disciplinary Information

On December 18, 2023, Muntz Financial, without admitting or denying the substance of the allegations, entered into a Consent Agreement with the Pennsylvania Department of Banking and Securities (the “Department”) concerning allegations that Muntz Financial (1) did not file an audited balance sheet with the Department as of its fiscal year end; and (2) did not take steps necessary to ensure that material information contained in its Form ADV and Exhibits remained current and accurate and filed timely with the Department, as required by applicable Department regulations. Pursuant to the terms of the Consent Agreement and Order, Muntz Financial will pay to the Department a total administrative assessment of \$80,000, payable in quarterly installments beginning in January 2024 and ending in October 2025.

On September 24, 2024, Christian Strzelecki, without admitting or denying the substance of the findings, submitted an Offer of Settlement to the Securities and Exchange Commission, which was accepted, concerning allegations that Mr. Strzelecki improperly allocated profitable trades to his personal accounts, family members’ accounts, and other affiliated accounts (the “Favored Accounts”) at the expense of his other advisory clients (the “Disfavored Accounts”). The Order finds that Mr. Strzelecki allocated a disproportionate share of trades with positive first day returns to the Favored Accounts while allocating a disproportionate share of trades with negative first day returns to Disfavored Accounts. The Favored Accounts received excess profits of approximately \$63,928, of which \$51,312 went to Strzelecki’s personal accounts, while the Disfavored Accounts suffered corresponding excess losses. As part of the settlement, Mr. Strzelecki will be suspended from the financial industry in all capacities for a period of 6 months, beginning on 10/07/2024 and ending on 04/06/2025 and shall pay disgorgement of \$51,312, prejudgment interest of \$8,390.98, and civil penalties of \$63,928.



## Item 10 Other Financial Industry Activities and Affiliations

Muntz Financial maintains a relationship with outside insurance agents and agencies that assist our clients in the purchase of insurance vehicles to accompany their personal financial plan or business need.

The following are a list of financial and insurance areas that those Muntz Financial focuses on. In many cases Muntz Financial will partner with an outside advisor or broker to facilitate the purchase or investment in any one of these products.

### **Qualified Plans**

#### **Defined Contribution Plans**

401k/Profit Sharing  
Simple, 403b, SEP

#### **Defined Benefit Plans**

Cash Balance  
Pension Plan

### **Group Health**

Health  
Dental

### **Property & Casualty**

Business Lines (WC, BOP, etc.)

### **Executive Plans**

At all times, Muntz Financial will act in the best interest of our clients and work to avoid any material conflicts of interest.

Carve Out Bonus Plans  
Deferred Compensation  
LTD, LTC

### **Group Benefits**

Temporary Disability  
Short Term Disability  
Long Term Disability  
Life and AD&D  
Long Term Care  
Voluntary Plans

### **Qualified Investments**

Private Equity  
Limited Partnerships  
Private Funds

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

Muntz Financial has a written Code of Ethics that covers the following areas:

Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions.

All prospective and current clients have the right to see our code of ethics. For a copy of the Code of Ethics, please ask your financial advisor at any time.

### **Participation or Interest in Client Transaction and Personal Trading**

Occasionally, representatives of Muntz Financial will buy or sell securities for themselves that they also recommend to clients. Muntz Financial will always trade in the best interest of our clients first.

## Item 12 Brokerage Practices

Muntz Financial, or its officers, maintains several custodial and brokerage relationships with nationally recognized firms. These firms include:

- Interactive Brokers LLC
- Nationwide Financial Services (including TD Ameritrade)
- Paychex Retirement Services
- ADP Retirement Services
- Great West
- Voya
- Vanguard
- Ohio National
- SEI Investments Company
- PCS

In the normal course of business Muntz Financial generally prefers to use Interactive Brokers LLC as the Broker/Dealer of choice for our actively traded individual advisory clients. IBKR delivers the Service, Independent Research, Trade Execution and Reporting necessary to properly maintain client portfolios.

Muntz Financial does not receive any 'soft dollar' revenue from IBKR for client referrals. Muntz Financial has done due diligence in choosing them as an appropriate custodian and has concluding that IBKR ranks among the highest firms in the industry.

The due diligence period included researching Service, Performance Reporting, Client Account Access, Commissions, Technology, Security, Investment Platform and Vehicles, Access to Independent Research and Trading.

IBKR allows Muntz Financial to aggregate trades for advisory clients. This process reduces overall trade costs to our clients.

## Item 13 Review of Accounts

The securities in every client's account will be under continuous review.

Client accounts will typically be reviewed quarterly but not less than annually.

Accounts will be reviewed by the President or the designated Advisor Representative on the account.

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations.

#### Item 14 Client Referrals and Other Compensation

Muntz Financial does not currently expect to receive referral compensation for any securities related business.

Muntz Financial has not, nor do we expect to, compensate any individual or company for client referrals.

## Item 15 Custody

Muntz Financial does not custody client assets. Clients can choose the custodian of their choice, or Muntz Financial will recommend a custodian at their request.

Muntz Financial does not accept custody of client funds. Clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. We urge you to carefully review such statements and compare such official custodial records to the account statements or reports that we may provide to you. Our statements or reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

For client accounts in which Muntz Financial directly debits their advisory fee:

- Muntz Financial possesses written authorization from the client to deduct advisory fees from an account held by a qualified custodian.
- Muntz Financial sends the qualified custodian written notice of the amount of the fee to be deducted from the client's account at the same time that it sends the client a written invoice itemizing the fee, including any formulae used to calculate the fee, the time period covered by the fee, and the amount of assets under management on which the fee was based.
- The custodian will send at least quarterly statements to the client showing all disbursements for the account, including the amount of the advisory fee.

#### Item 16 Investment Discretion

Muntz Financial accepts discretionary authority to manage accounts on behalf of clients. Although it is not customary, clients do have the right to restrict any individual security or investment vehicle.

Muntz Financial assumes this authority under contract, Muntz Financial, LLC Investment Advisory Contract and by acknowledgement on the application with the Custodian. Wherever necessary, this authority is also assumed with the execution of a Limited Power of Attorney.

Additionally, Muntz Financial also provides non-discretionary management services.

#### Item 17 Voting Client Securities

Muntz Financial accepts authority to vote client securities. Generally, we accept the recommendation of the Board of Directors unless there is clear evidence that this would materially conflict with a client's best interest.

Muntz Financial maintains Written Proxy Voting Policies and Procedures for voting client shares. Clients have the right to see these procedures and may request a copy at any time.

Muntz Financial offers no restriction on clients voting their own shares or directing us to vote in a specific manner.

Voting client shares presents the possibility of a conflict of interest as Muntz Financial, our representatives or other clients, may own shares of a similar or competing company. At all times, Muntz Financial and any representatives, act with our client's best interest in mind, specific to the circumstance at hand.

Clients may contact us, by phone or in writing, to request a report of how we voted their shares.

#### Item 18 Financial Information

Muntz Financial does not have any financial condition that is reasonably likely to impair our ability to meet contractual commitments to clients.