

Intentional Funds LLC

FIRM BROCHURE
PART 2A OF FORM ADV

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Intentional Funds LLC

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Part 2A of Form ADV (the “Brochure”) provides information about the qualification and business practices of Intentional Funds LLC (“Intentional Funds,” “we,” “IF LLC,” “Firm”, or the “ADVISER”). The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority.

Intentional Funds LLC is a registered investment adviser with the SEC; however, such registration does not imply a certain level of skill or training, and no inference to the contrary should be made.

If you have any questions about the contents of this Brochure, please contact us at [917-776-7237] or by email at [info@intentionalfunds.com]. Additional information about

Intentional Funds LLC is also available on the ADVISER's website at <https://IntentionalFunds.com>. Intentional Funds LLC's CRD number is 322991.

Item 2: Material Changes

As this is Intentional Funds' first filing, there are no material changes that we would like to report.

Summary of Material Changes:

N/A

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Item 4: Advisory Business

A. Description of the Advisory Firm

Intentional Funds LLC (hereinafter “ADVISER”) is a corporation organized in the State of Delaware and located in Princeton, New Jersey. ADVISER was founded on July 27, 2022. ADVISER is an asset manager that delivers an actively managed suite of proprietary financial products to financial intermediaries as well as provides wealth advisory services directly to clients of its own.

B. Types of Advisory Services

ADVISER offers ongoing portfolio construction and management services based on the investment objectives and risk tolerance of its portfolio management clients ("Portfolio Management Clients"). Portfolio construction and management services include, but are not limited to, the following:

Investment strategy
Asset allocation

Asset and security selection
Regular portfolio monitoring

ADVISER generally requests discretionary authority from Portfolio Management Clients, which allows it to select securities and execute transactions without requiring permission prior to each transaction, so long as such execution is consistent with the stated investment objectives of the Portfolio Management Client. If ADVISER’s authority is non-discretionary, we will make recommendations to the Portfolio Management Client, based on the client’s investment goals and the terms of the agreement, after which, either ADVISER or the client will be responsible for the execution of the transactions.

Financial guidelines and investment objectives for the implementation and management of a particular Portfolio Management Client strategy are generally provided via an investment strategy statement. Within the construct of an investment strategy statement, ADVISER seeks to provide that investment management decisions are made in accordance with any fiduciary duties owed to its portfolio management clients. To meet its obligations, ADVISER’s policy is to seek fair and equitable allocation of investment opportunities/transactions among its portfolio management clients to avoid favoring one portfolio management client over another over time. ADVISER’s policy is to allocate investment opportunities and transactions it identifies as appropriate and prudent among its portfolio management clients on a fair and equitable basis over time.

Portfolio management clients can choose from ADVISER’s equity portfolios that align with thematic and/or industry goals. These goals map to the UN Sustainable Development Goals to include themes such as decreasing poverty, reducing hunger, increasing health and wellness, better education, gender equality, clean water, renewable energy, economic growth, infrastructure, reduced inequalities, sustainable cities, responsible consumption, climate action, life underwater, life on land, strong institutions, partnerships. These portfolios are managed with

the objective of providing market alpha performance. These portfolios will be available through separately managed portfolios and model based portfolios. It is also anticipated that direct indexes on these themes will be developed and ETFs may be constructed. These thematic portfolios will be managed on discretion and will be made available on multiple platforms that access wealth advisors. In addition to these equity products ADVISER will also provide advice directly to clients on portfolios who work directly with ADVISER. ADVISER also intends to provide subadvisory and portfolio overlay capabilities to other investment firms who seek ADVISER expertise, in these cases, ADVISER will serve the investment firm and not be directly responsible for their underlying client.

Educational Seminars/Workshops

ADVISER provides educational seminars and workshops for Clients, prospective Clients, and students. These are general in nature and focused on various sustainability and ESG-related topics. No personalized advice is provided to attendees. These seminars and workshops are currently offered at no charge.

Services Limited to Specific Types of Investments

ADVISER generally limits its investment portfolios to securities of both U.S. and non-U.S. companies, although ADVISER primarily utilizes individual public and private equities. ADVISER may also use other financial products, including but not limited to, other securities and debt funds to help diversify a portfolio when applicable.

C. Client Tailored Services and Client Imposed Restrictions

For Portfolio Management, Clients provide input of their sustainability and/or financial preferences, which are collated into a format used by ADVISER's portfolio construction process. Portfolios are then managed on an ongoing basis through the Client's chosen investment platform. Portfolios are monitored and maintained in line with such Client preferences.

D. Assets Under Management

Intentional Funds LLC has the following assets under management:

Discretionary:	Non-Discretionary:	As of:
\$5,000,000	\$115,000,000	May 1, 2024

E. Assets Under Advisement

Intentional Funds LLC advises on (but does not manage) the following assets:

Assets Under Advisement	As of:
\$25,000,000	May 1, 2024

Item 5: Fees and Compensation

A. Fee Schedule

Portfolio Management Fees

For portfolio management services, ADVISER charges up to the following:

Total Assets Under Management	Annual Fees
Assets invested in Separately Managed Portfolios	.50%
Non Discretionary Advice	.75%
Assets Invested in Model Portfolios [Type of Product]	.40%
Assets invested in Customized Indexes	.25%

ADVISER generally uses an average of the daily balance in the Portfolio Management Client's account throughout the billing period, after taking into account deposits and withdrawals, to determine the market value of the assets upon which the advisory fee is based.

These fees are generally negotiable, and the final fee schedule is attached to the applicable agreement. This relationship will be memorialized in an agreement between ADVISER and the Portfolio Management Client.

B. Payment of Fees

Payment of Portfolio Management Services Fees

Generally, portfolio management fees are withdrawn directly from the Portfolio Management Client's accounts on a quarterly basis. The portfolio management fees are generally paid in arrears and calculated on a daily basis by applying the annualized management fee set forth in the applicable Portfolio Management Client agreement pro rata to the closing market value of each Portfolio Management Client account, as set forth on account records maintained by the applicable custodians. In the event the applicable agreement is either executed at any time other than the first day of the calendar quarter or terminated prior to the last day of the calendar quarter, the fee will be prorated based on the number of days the Portfolio Management Client account's assets were under management.

C. Client Responsibility for Third-Party Fees

Clients are responsible for the payment of all third-party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by ADVISER. Please see Item 12: Brokerage Practices of this Brochure.

D. Prepayment of Fees

ADVISED generally collects its fees in arrears.

However, when Clients bill in advance ADVISED will mutually determine with the Client if ADVISED's fee is to be billed in advance or in arrears. Refunds of fees for Clients will be calculated and processed by the Clients in accordance with their normal billing process. Clients will generally net any refunds owed from future fee payments to ADVISED.

E. Outside Compensation for the Sale of Securities Clients

Neither ADVISED nor its supervised persons accept any compensation for the sale of 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

ADVISED does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a Client. ADVISED plans to launch private equity funds in the future that will include a performance-based fee. When these funds are launched we will amend our ADV.

Item 7: Types of Clients

ADVISED generally provides services to the following types of Clients:

Individuals

High-Net-Worth Individuals

Family Offices

Wealth Management Firms

Financial intermediaries

Investment Companies

Endowments & Foundations

Charitable Organizations

Pension and Profit-Sharing Plans

Corporations or Business Entities

National and Regional Banks

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

A. Methods of Analysis and Investment strategies

ADVISED's technology-driven investment strategies are centered on quantitative analysis. ADVISED's portfolio technology utilizes third-party automated portfolio optimizers which incorporate a number of statistical methods to manage the portfolio's expected risk and return.

ADVISED uses long-term trading. As with most investment strategies, investing in securities involves the risk of loss that Clients should be prepared to bear.

ADVISER also uses third-party data providers to review ESG exposure.

B. Summary of Material Risks

Clients should be aware that there is a material risk of loss using any investment strategy and no assurance can be given that the investment activities of a client's account will achieve the investment objectives of such an account or avoid losses. Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear. Below are several risk factors associated with the types of investment strategies and types of securities utilized by ADVISER.

Concentration Risk: The concentration of investments can cause a strategy to be susceptible to an increased risk of loss. Including losses due to idiosyncratic risks that affect the strategies' investments more than the market as a whole, to the extent that the strategies' investments are concentrated in the securities of a particular issuer or issuers, country, group of countries, region, market, industry, group of industries, sector or asset class.

Cybersecurity Risk: ADVISER is a company that stores information about its business and Clients. This information may be susceptible to both intentional and unintentional breaches of the systems ADVISER has set up to safeguard its information. The risk that information will be exposed can include but is not limited to the malicious actions of third parties to access confidential information, cyberattacks intended to disrupt ADVISER's business, or inadvertent disclosure of information by an ADVISER employee. Moreover, ADVISER engages third-party vendors for a variety of services that may have access to stored Client data and other confidential information or may be relied on by ADVISER to perform key business functions. If such a third party were to be hacked, a Client's confidential information may be shared, and ADVISER may not be able to access key business functions required for it to carry on with its business.

Economic and Political/Regulatory Risk: This type of risk can result in fluctuation in the value of securities due to political, geographical, economic and regulatory changes. Political or regulatory conditions can impact the operational and financial performance of companies, geographies, or industries specifically, as well as the market and benchmark performance as a whole.

Equity Risk: Equity investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions, and the general economic environments.

ESG Data Risk: ADVISER uses third-party data providers whose data may be missing, incomplete, or inaccurate. Data that was obtained by third parties can cause ADVISER to assess a company's ESG risk improperly. Additionally, ESG practices differ across regions and industries, and as a result, a company's practices may materially differ from ADVISER's assessment. Some of the data used at ADVISER is predictive based on historical data collected from third parties. ADVISER will, in its sole discretion, continue to test models and update the frameworks as it sees fit. There are no assurances that these models are accurate or that they will

help Clients achieve their financial objectives. Moreover, changes to the regulatory landscape may curtail ADVISER's ability to gather data and implement its sustainability-related models.

Health Crises, Pandemics, War, and Terrorism Risk: A Client is subject to the risk that significant events may impact a particular company, a region in which it operates, or impact the entire world. In the past, events like pandemics, terrorist attacks, and wars have influenced markets and have had adverse effects on companies' profits. These events may have negative long-term effects on world economies and markets more generally over the short and long terms. The risk of loss may increase during these periods, and a Client's overall portfolio performance can go down.

Long-Term Trading Risk: Long-term trading is generally designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose Clients to various types of risk that will surface at various intervals while the Client owns the investments.

Market Risk: Market value changes can result in long-term investment strategies losing money over short periods due to short-term market movements and over longer periods during more prolonged market downturns.

Non-U.S. Company Risk: Non-US company securities present certain risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting, and the lesser degree of accurate public information available.

Sustainability Screening Risk: Sustainability or other screening criteria limit the types and number of investment opportunities available and, as a result, strategies with screens may underperform other strategies or funds that do not have a sustainable focus or do not require companies to meet a sustainable standard.

Tracking Error Risk: Tracking error is the divergence of the investment strategies' performance from that of the adviser-selected benchmark. Differences between securities selected by the strategy and those included in the selected benchmark, differences in transaction costs, differences in cash held, differences in the timing of the accrual of or the valuation of dividends or interest, tax gains or losses contribute to tracking error. This risk may be heightened during times of increased market volatility or other unusual market conditions.

Item 9: Disciplinary Information

A. Criminal or Civil Actions

There are no criminal or civil actions to report.

B. Administrative Proceedings

There are no administrative proceedings to report.

C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

A. Registrations as a Broker/Dealer or Broker/Dealer Representative

Neither ADVISER nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither ADVISER nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interest

ADVISER is fully owned by Seventeen Asset Management LLC (17 Asset Management). At this time, neither ADVISER or its hired representatives have potential conflicts of interest or material registration relationships to disclose.

ADVISER has entered into an arrangement with Freedom Advisors as a platform to provide models to other advisors. ADVISER will also use Freedom Advisors to access custodians and to provide account performance.

ADVISER has also entered into an arrangement with Syntax Data Inc. This arrangement is for research services as well as joint marketing services of a marketing platform called Intentional Solutions Platform. This is an agreement for data services and is fully communicated on any marketing material and provides no conflicts at this time.

D. Selections of Other Advisers or Managers and How This Adviser is Compensated for those Selections

ADVISER does not select third-party investment advisers.

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

A. Code of Ethics

ADVISED has adopted a written Code of ethics (the "Code*"), pursuant to Rule 204A-1 of the Investment Advisers Act of 1940 (the "Advisers Act*"). The Code sets forth the high ethical standards of business conduct that ADVISOR requires from any of its employees and any other person who provides investment advice on behalf of ADVISOR and is subject to its supervision and control (referred to as "Supervised Persons").

ADVISED has a fiduciary duty to its Clients and all of its and its Supervised Persons investment activities are subject to this fiduciary duty. The Code requires all Supervised Persons to adhere to the highest ethical standards in dealing with Clients and to disclose all potential conflicts of interest to ADVISED. Supervised Persons must refrain from engaging in any activity or having a personal interest that presents a material conflict of interest with ADVISED Clients. A conflict of interest can arise whenever a Supervised Person takes an action or has an interest that makes it difficult for them to perform their duties and responsibilities honestly and objectively. All Supervised Persons are provided with a copy of the Code and must certify that they have received it and agree to comply with its provisions upon hire and annually thereafter. Supervised Persons are instructed to promptly report any suspected violations of the Code to the CCO.

Specifically, ADVISED Code imposes reporting obligations and trading restrictions on Supervised Persons and their immediate family members related to personal securities transactions. Supervised Persons must submit an initial securities holdings report to the CCO (or designee) upon hire and quarterly thereafter. The Code also requires the prior approval of (i) any acquisition of securities in a private placement or an initial public offering and (i) any purchase or sale in American Depositary Receipts.

The Code includes policies and procedures in the following areas: Outside Business Activities, Gifts and Entertainment, Political Contributions, Misappropriation of Material Non-Public Information, Personal Securities Trading, Referral Arrangements, Anti-Money Laundering, Whistleblower Program, and Reporting Violations.

A copy of Intentional Fund's Code is available to any Client or prospective Client upon request by contacting the ADVISED at info@IntentionalFunds.com.

B. Recommendations Involving Material Financial Interests

ADVISED does not recommend that Clients buy or sell any security in which ADVISED or a related person has a material financial interest.

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of ADVISER may buy or sell securities for themselves that are also utilized in Client portfolios. This may provide an opportunity for representatives of ADVISER to buy or sell the same securities before or after purchasing the same securities for Clients. Such transactions may create the appearance of a conflict of interest or representatives profiting off Client transactions. ADVISER requires access persons to provide required personal securities holdings and transaction statements which are reviewed by the CCO (or designee) and will document any transaction that could be construed as conflicts of interest to ensure representatives are not engaging in trading that operates to the clients' disadvantage.

D. Trading Securities At/Around the Same Time as Clients' Securities

From time to time, ADVISER and representatives of ADVISER may buy or sell securities for themselves at or around the same time as Clients. This may provide an opportunity for representatives of ADVISER to buy or sell securities before or after purchasing the same securities for Clients. Such transactions may create the appearance of a conflict of interest or representatives profiting off Client transactions. ADVISER requires access persons to provide required personal securities holdings and transaction statements which are reviewed by the CCO (or designee) and will investigate any transactions that could be construed as conflicts of interest to ensure representatives are not engaging in trading that operates to the Client's disadvantage.

ADVISER does not engage in Principal (buys securities for itself from or sells securities it owns to any Client) or Agency Cross Transactions (acts as the broker for Clients of the firm and the other party to the transaction).

Item 12: Brokerage Practices

A. Factors Used to Select Custodians and/or Broker/Dealers

Ultimately, Clients direct ADVISER as to which custodian will be used for their accounts.

When asked to provide broker/dealer or custodian recommendations, ADVISER considers execution abilities, transaction costs, accuracy, responsiveness, financial stability, etc. ADVISER may also consider the market expertise and research access provided by the broker/dealer or custodian, including but not limited to access to written research, oral communication with analysts, admittance to research conferences, and other resources provided by the brokers that may aid in ADVISER's research efforts.

Research and Other Soft-Dollar Benefits

ADVISER does not have a formal soft-dollars program. ADVISER does not utilize soft-dollar benefits to service Client accounts or receive soft-dollar benefits as a result of Client account activity.

Brokerage for Client Referrals

ADVISED receives no referrals from a broker/dealer or third party conditioned upon using that service provider.

Clients Directing Which Broker/Dealer/Custodian to Use

ADVISED is generally only authorized to execute trades through the specified broker/dealer affiliated with the custodian selected by the Client. As such, the Client is responsible to negotiate terms and arrangements for the account and ADVISED will not seek better execution services or prices from other broker/dealers. While we may batch orders for execution for accounts held with the same custodian, we are unable to batch Client transactions for execution across other broker/dealers with orders for other accounts managed by ADVISED, which may result in higher commissions and less favorable prices (particularly for illiquid securities or during volatile market conditions).

In two scenarios, however, ADVISED will have the ability or authority to select broker/dealers to execute trades to implement the selected investment strategy: (1) when opening a wealth advisory account directly with the client; or (2) when executing trades for Clients that custody at certain custodians. In both scenarios, ADVISED understands its fiduciary duty to seek best execution. As such, ADVISED shall execute securities transactions in such a manner that the total cost or proceeds in each transaction is most favorable under the circumstances of the particular transaction.

While it is ADVISED's general practice to transact business with dealers that ADVISED's due diligence has identified as having an established history of providing generally favorable bids and/or offers on security transactions consistent with the settlement date needs of its Clients, ADVISED is not obligated to choose the broker/dealer offering the lowest available commission rate or price if, in the trader's reasonable judgment more favorable execution can be achieved elsewhere. In seeking the best execution and negotiating commission rates, the commission cost is one-factor ADVISED considers. Other factors include but are not limited to, price, quality, speed, efficiency, confidentiality, reliability of brokerage services, execution capability, a firm's financial responsibility, the difficulty of specific transactions, and any other logistical or processing considerations.

B. Aggregating (Block) Trading for Multiple Client Accounts

If ADVISED buys or sells the same securities on behalf of more than one Client, then it may (but would be under no obligation to) aggregate or bunch such securities in a single transaction for multiple Clients in order to seek more favorable prices, lower brokerage commissions, or more efficient execution. In such cases, ADVISED would place an aggregate order with a broker on behalf of applicable Clients in order to ensure fairness for those Clients; provided, however, that trades would be reviewed periodically to ensure that accounts are not systematically disadvantaged by this policy.

Item 13: Review of Accounts

A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

All Client accounts for ADVISER's advisory services provided on an ongoing basis are reviewed periodically by ADVISER's Chief Compliance Officer, Heather McGee who will follow ADVISER's written account review process with regard to Client's respective investment strategy statements. All accounts at ADVISER are assigned to this reviewer.

B. Factors That Will Trigger a Non-Periodic Review of Client Accounts

Non-periodic reviews are only performed if there is a question as to whether a Client's account is being managed in line with the selected inputs.

C. Content and Frequency of Regular Reports Provided to Clients

Clients and other advisory firms and clients receive a quarterly statement detailing the client's account, including assets held, asset value, and calculation of fees. This written statement is prepared by their respective custodian.

Item 14: Client Referrals and Other Compensation

A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards and Other Prizes)

ADVISER only receives compensation via its advisory arrangements directly with its Clients.

B. Compensation to Non-Advisory Personnel for Client Referrals

ADVISER has entered into written arrangements with Syntax Data Inc. for them to act as a promoter for ADVISER's investment products through the Intentional Solutions Platform. The conflicts of interest in relation to this arrangement are disclosed in Item 10(C), above.

Referral relationships are fully disclosed to each Client to the extent required by applicable law. ADVISER will monitor to ensure any promoter with whom it is engaged under this type of arrangement is exempt, notice filed, or properly registered in all appropriate jurisdictions. All such referral activities will be conducted in accordance with Rule 206(4)-1 under the Advisers Act, where applicable.

Item 15: Custody

When advisory fees are deducted directly from end client accounts at the custodian, ADVISER will be deemed to have limited custody of the end client's assets solely for this purpose and must be granted authorization by the end client to do so. All clients and end clients will receive account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy.

Item 16: Investment Discretion

ADVISER provides both discretionary and non-discretionary investment advisory services to Clients. The advisory contract established with each Client sets forth the discretionary authority for trading. Where investment discretion has been granted, Intentional Funds generally manages the Client's accounts and makes investment decisions without consultation with the Client as to when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, what securities to buy or sell, or the price per share. In some instances, ADVISER's discretionary authority in making these determinations may be limited by conditions imposed by a Client (in investment guidelines or objectives, or Client instructions otherwise provided to ADVISER).

Item ADVISER: Voting Client Securities (Proxy Voting)

ADVISER may accept proxy voting authority for client and end client securities. Until proxy voting is accepted by ADVISER in writing, clients and end clients will receive proxies directly from the issuer of the security or the custodian and all proxy questions should be directed to the issuer of the security.

Item 18: Financial Information

A. Balance Sheet

ADVISER neither requires nor solicits prepayment of more than \$1,200 in fees per Client, six months or more in advance and therefore is not required to include a balance sheet with this Brochure.

B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither ADVISER nor its management has any financial condition that is likely to reasonably impair ADVISER's ability to meet contractual commitments to Clients.

C. Bankruptcy Petitions in Previous Ten Years

The firm has not been the subject of a bankruptcy petition in the last ten years.