

Part 2A of Form ADV: Firm Brochure

Item 1: Cover Page
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April 17, 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. 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.

Item 2: Material Changes

Since the last annual update of our Firm Brochure on March 26, 2013, 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 Finom Inc., a Delaware Corporation.

On April 16, 2013, Rohan Monga resigned from the management of Finom. He remains an indirect owner of Finom Financial LLC.

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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. of which David Gomel, Aziz Lalljee and Rohan Monga are the sole owners, and David Gomel and Aziz Lalljee are the sole officers.

Finom provides information on the characteristics and performance of SEC and State registered investment advisers (“RIA”) to our clients who may be prospective clients of these RIAs. Using financial algorithms, we 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, they must provide historical returns 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 analyzed by us, and who agree to meet with clients 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.

Persons who complete our on-line questionnaire will become clients of Finom. Based on the investment criteria that a client provides and their risk-tolerance (either derived from their answers to the questionnaire or indicated directly), we provide the client with a list of RIA performance data which the client may review. The names of specific RIAs will not be provided to the client until the client chooses an RIA based solely on their review of an RIA’s statistical information which we provided to them and we have a signed solicitation agreement in place with said RIA. We will then contact the RIA with our client’s information for them to make direct contact with the client. The client may then choose to enter into an investment advisory agreement with one or more RIAs. Our clients 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 the client should be carefully reviewed by the client.

Our business is limited to these activities. Finom does not manage, take custody of, or provide asset allocation advice on any client assets.

Item 5: Fees & Compensation

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

Finom may also, in a 12-month period, charge up to 15 RIAs for the results of their performance as determined by our platform.

In the event that a client enters into an investment advisory agreement with an RIA sourced through Finom, the RIA will pay us for our solicitation services generally based on one of two options in our two-tiered pricing schedule as follows:

Option 1:

RIA pays us a one-time solicitation fee of up to 100 basis points (“bps”) of the assets under management in the client’s account at the time the client enters into an investment advisory agreement with the RIA; or

Option 2:

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 the client/RIA relationship. Finom bills the RIA quarterly, in arrears, based on the total assets under management in the client’s account 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 by an RIA as a result of Finom’s recommendations to a client, 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 the client opens subsequent accounts with the RIA or 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 a client closes an account with an RIA, our solicitation agreement with the RIA will cease as of the date of account termination.

The client should refer to the RIA’s brochure as to the fees the client will be charged by the RIA for its services as well as disclosure about transaction costs to the client (*e.g.*, custodial fees, mutual fund expenses).

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

Our firm does not charge performance-based fees nor enter into side-by-side management arrangements.

Item 7: Types of Clients

Finom typically serves individuals and small institutions. Finom has no minimum account size requirements for clients who open or maintain an account with selected RIAs, except in so far as a recommended RIA may have its own account minimum requirement.

For example, Finom would not recommend that a client that wishes to invest \$250,000 contact 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 analysis of the RIA's historical performance data using financial algorithms and other disclosure information provided to us by the RIAs. Finom seeks to connect our clients with the RIAs that fit their specific investment management needs. Finom filters, scores, and displays RIAs based on client-specific needs and characteristics. At Finom, we filter RIAs based on geographic location, account size, or other preferences specified as constraints by the client.

Finom then displays the filtered list of RIAs in order of their performance scores. Performance scores are computed as follows. (a) Finom captures the client-specific risk profile – the client's ability and proclivity to take risk – either through a questionnaire completed on-line by the client, or as indicated directly by the client on our platform; (b) Finom analyzes the client portfolios of each RIA, dividing them into risk clusters with specific average asset allocations, returns, and volatilities; and (c) Finom then links the client's risk profile to a matching risk cluster of each appropriate RIA on the platform. Finom then scores RIAs based on the returns of the risk-adjusted cluster deemed to be a match with the risk profile of the individual client. Hence, the same RIA may have different scores for individuals with different risk profiles. The cluster analysis offers, in effect, a simulation of how the assets of an individual might have fared with a specific RIA over a specific holding period. We rely on publicly available market data to inform our analysis of RIA performance.

Beyond the cluster analysis, Finom weights each RIA's performance by sub-asset class (very specific definitions well beyond the typical equity/fixed income/cash). This allows Finom to offer personalized (incorporating the client's unique risk tolerance and risk-taking ability) and objective (comparing RIA performance by well-known sub-asset classes across all their current clients) intelligence on RIAs.

Finally, Finom analyzes and displays RIA performance in the context of other available information, such as public Form ADV filings, any potential complaints by current or former clients, and the professed investing style, tenure, education, and experience of the RIA. Clients then choose specific RIAs from the generated list based solely on their

review of the statistical information of RIAs on our platform. Once the client has chosen the RIA(s), we then contact the selected RIA(s) either to first obtain a signed solicitation agreement or, if such agreement is in place, provide them with the name of our client. The RIA then contacts the interested client(s) and offers their investment advisory services offline.

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

Our list of the recommended RIAs statistical information that is provided to the client does not in any way mean that we guarantee the performance of the RIA. Our services will serve to provide only a screening of RIAs which does not provide any guarantee of investment management performance by the RIA.

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 our clients' evaluation of the Firm 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, Participation or Interest in Client Transactions 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

Please refer to Item 5.

Item 13: Review of Accounts

We do not review a client's account as such account is maintained with and reviewed by the RIA. A client should review Item 13 of the RIA's brochure. We continue to monitor the RIA's overall performance as long as the RIA wishes to remain on our platform.

Item 14: Client Referrals and Other Compensation

We do not compensate any person for client referrals.

Item 15: Custody

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

Our clients do not receive any account statements from us but rather such statements should be provided to the client from the custodian of the RIA or the RIA itself.

Item 16: Investment Discretion

We do not have investment discretion over our client's assets. Such investment discretion is with the RIA with whom the client has entered into an investment management arrangement. A client should review Item 16 in the RIA's brochure.

Item 17: Voting Client Securities

We do not vote proxies for clients. The RIA for the client may or may not vote proxies for the client based on the investment management agreement. A client should review Item 17 in the RIA's brochure.

Item 18: Financial Information

Finom has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, 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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April 17, 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 those provided to our clients.

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