

Intelligent 401K, LLC

Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of Intelligent 401K, LLC. If you have any questions about the contents of this brochure, please contact us at (602) 510-1177 or by email at: clientservices@intelligent401k.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 Intelligent 401K, LLC is also available on the SEC's website at www.adviserinfo.sec.gov. Intelligent 401K, LLC's CRD number is: 310345.

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Registration as an investment adviser does not imply a certain level of skill or training.

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Item 2: Material Changes

Intelligent 401K, LLC has not yet filed an annual updating amendment using the Form ADV Part 2A. Therefore, there are no material changes to report.

Item 3: Table of Contents

Item 1: Cover Page	
Item 2: Material Changes.....	ii
Item 3: Table of Contents.....	iii
Item 4: Advisory Business	2
Item 5: Fees and Compensation.....	3
Item 6: Performance-Based Fees and Side-By-Side Management	5
Item 7: Types of Clients	5
Item 8: Methods of Analysis, Investment Strategies, & Risk of Loss	5
Item 9: Disciplinary Information.....	7
Item 10: Other Financial Industry Activities and Affiliations.....	7
Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....	9
Item 12: Brokerage Practices	10
Item 13: Review of Accounts.....	11
Item 14: Client Referrals and Other Compensation.....	11
Item 15: Custody	11
Item 16: Investment Discretion.....	12
Item 17: Voting Client Securities (Proxy Voting)	12
Item 18: Financial Information.....	12

Item 4: Advisory Business

A. Description of the Advisory Firm

Intelligent 401K, LLC (hereinafter “Intel401K”) is a Limited Liability Company organized in the State of Arizona. The firm was formed in March 2020, and the principal owner is Intelligent 401K Holdings Delaware LLC.

B. Types of Advisory Services

Robo-Advisory Portfolio Management Services

Intel401K provides “robo-advisory” portfolio management services through an online interface. This entails the use of algorithm-based portfolio management advice, rather than in-person investment advice. These automated investment solutions are customized to each client and based on individual characteristics, such as the client’s age, estimated retirement age, risk tolerance, and current assets, among others. Intel401K’s investment advisory personnel oversee the algorithm but may not monitor each client’s account. Clients are encouraged to update their account/questionnaire with any change in their objectives, risk tolerance, or other pertinent information, as that information factors into the portfolio’s composition.

Services Limited to Specific Types of Investments

Intel401K generally limits its investment advice to ETFs. Intel401K may use other securities as well to help diversify a portfolio when applicable.

C. Client Tailored Services and Client Imposed Restrictions

Intel401K offers the same suite of services to all of its clients. However, specific client investment strategies and their implementation are dependent upon the Client Investment Policy Statement which outlines each client’s current situation (risk tolerance levels). Clients may not impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs.

D. Wrap Fee Programs

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and other administrative fees. Intel401K does not participate in any wrap fee programs.

E. Assets Under Management

Intel401K has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$0	\$0	August 2020

Item 5: Fees and Compensation

A. Fee Schedule

Robo-Advisory Portfolio Management Services Fees

Intel401K provides robo-advisory portfolio management services via an online interface.

Fixed Fees

Intel401K offers three simple pricing plans: Basic, Signature and Premium.

Basic - Provides simple balancing based on age and risk tolerance for automated balancing. The fee for this plan is \$9 per month.

Signature - Includes "Basic" plus cost savings from the lowest expense ratio funds and incorporating the Macro Market Analysis weighting for enhanced performance. It is projected that Premium will be the most preferred plan. The fee for this plan is \$12 per month.

Premium - Includes "Signature" plus an annual one-hour consultation with an advisor. The plan also offers unlimited amount of retirement accounts for the monthly fee. The fee for this plan is \$24 per month.

Clients may terminate the Investment Advisory Contract with thirty days' written notice.

The final fee schedule will be memorialized in the client's advisory agreement.

B. Payment of Fees

Payment of Robo-Advisory Portfolio Management Fees

The Robo-advisory portfolio management fees will be invoiced and billed directly to the client, payable by credit card, PayPal, ACH, on a monthly basis. Fees are paid in advance.

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 service fees and expenses charged by Intel401K. Please see Item 12 of this brochure regarding broker-dealer/custodian.

D. Prepayment of Fees

Intel401K collects fees in advance. Refunds for fees paid in advance but not yet earned will be refunded on a prorated basis and returned within fourteen days to the client via check.

For all asset-based fees paid in advance, the fee refunded will be equal to the balance of the fees collected in advance minus the daily rate* times the number of days elapsed in the billing period up to and including the day of termination. (*The daily rate is calculated by dividing the annual asset-based fee rate by 365.)

E. Outside Compensation For the Sale of Securities to Clients

Steven Patrick Demarest is a registered representative of a broker-dealer. Michael Jonathan Floyd is an insurance agent. In these roles, they accept compensation for the sale of institutional investment advice or insurance products to non-clients of Intel401K unless otherwise disclosed.

1. This is a Conflict of Interest

Supervised persons may receive indirect compensation resulting from service fees generated through the sale of ETFs to Intel401K's clients through account automatic rebalancing. This presents a potential indirect conflict of interest. Supervised persons are not incentivized to recommend products based on the compensation received rather than on the client's needs. When recommending the sale of investment products for which the supervised persons receives compensation, Intel401K will document the conflict of interest in the client file and inform the client of the conflict of interest.

2. Clients Have the Option to Purchase Recommended Products From Other Brokers

Clients always have the option to purchase Intel401K recommended products through other brokers or agents that are not affiliated with Intel401K.

3. Commissions are not Intel401K's primary source of compensation for advisory services

Commissions are not Intel401K's primary source of compensation for advisory services.

4. Advisory Fees in Addition to Commissions or Markups

Advisory fees that are charged to clients are not reduced to offset the commissions or markups on investment products recommended to clients.

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

Intel401K 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.

Item 7: Types of Clients

Intel401K generally provides advisory services to individuals.

There is no account minimum.

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

A. Methods of Analysis and Investment Strategies

Methods of Analysis

Intel401K's methods of analysis include Quantitative analysis.

Quantitative analysis deals with measurable factors as distinguished from qualitative considerations such as the character of management or the state of employee morale, such as the value of assets, the cost of capital, historical projections of sales, and so on.

Investment Strategies

Intel401K uses long term trading.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

B. Material Risks Involved

Methods of Analysis

Quantitative analysis Investment strategies using quantitative models may perform differently than expected as a result of, among other things, the factors used in the models, the weight placed on each factor, changes from the factors' historical trends, and technical issues in the construction and implementation of the models.

Investment Strategies

Long term trading is 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 typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

C. Risks of Specific Securities Utilized

Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below are not guaranteed or insured by the FDIC or any other government agency.

Exchange Traded Funds (ETFs): An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Risks in investing in ETFs include trading risks, liquidity and shutdown risks, risks associated with a change in authorized participants and non-participation of authorized participants, risks that trading price differs from indicative net asset value (iNAV), or price fluctuation and disassociation from the index being tracked. With regard to trading risks, regular trading adds cost to your portfolio thus counteracting the low fees that one of the typical benefits of ETFs. Additionally, regular trading to beneficially "time the market" is difficult to achieve. Even paid fund managers struggle to do this every year, with the majority failing to beat the relevant indexes. With regard to liquidity and shutdown risks, not all ETFs have the same level of liquidity. Since ETFs are at least as liquid as their underlying assets, trading conditions are more accurately reflected in implied liquidity rather than the average daily volume of the ETF itself. Implied liquidity is a measure of what can potentially be traded in ETFs based on its underlying assets. ETFs are subject to market volatility and the risks of their underlying securities, which may include the risks associated with investing in smaller companies, foreign securities, commodities, and fixed income investments (as applicable). Foreign securities in particular are subject to interest rate, currency exchange

rate, economic, and political risks, all of which are magnified in emerging markets. ETFs that target a small universe of securities, such as a specific region or market sector, are generally subject to greater market volatility, as well as to the specific risks associated with that sector, region, or other focus. ETFs that use derivatives, leverage, or complex investment strategies are subject to additional risks. The return of an index ETF is usually different from that of the index it tracks because of fees, expenses, and tracking error. An ETF may trade at a premium or discount to its net asset value (NAV) (or indicative value in the case of exchange-traded notes). The degree of liquidity can vary significantly from one ETF to another and losses may be magnified if no liquid market exists for the ETF's shares when attempting to sell them. Each ETF has a unique risk profile, detailed in its prospectus, offering circular, or similar material, which should be considered carefully when making investment decisions.

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.

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. Registration as a Broker/Dealer or Broker/Dealer Representative

As a registered representative of Surfrtrade LLC, Steven Patrick Demarest accepts compensation from the sale of institutional client advice.

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

Neither Intel401K 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 Interests

Steven Patrick Demarest is a registered representative of Surftrade LLC and from time to time, will offer clients advice or products from those activities. Clients should be aware that these services pay a commission or other compensation and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. Intel401K always acts in the best interest of the client, including with respect to the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of Intel401K in such individual's capacity as a registered representative.

Michael Jonathan Floyd is an investment adviser representative with another investment advisory firm, Bayntree Wealth Advisors, LLC, and from time to time, may offer clients advice or products from those activities and clients should be aware that these services may involve a conflict of interest. Intel401K always acts in the best interest of the client and clients are in no way required to use the services of any representative of Intel401K in connection with such individual's activities outside of Intel401K.

Michael Jonathan Floyd is an independent licensed insurance agent with Bayntree Planning Group LLC, and from time to time, will offer clients advice or products from those activities. Clients should be aware that these services pay a commission or other compensation and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. Intel401K always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients are in no way required to utilize the services of any representative of Intel401K in connection with such individual's activities outside of Intel401K.

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

Intel401K does not utilize nor select third-party investment advisers.

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

A. Code of Ethics

Intel401K 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. Intel401K's Code of Ethics is available free upon request to any client or prospective client.

B. Recommendations Involving Material Financial Interests

Intel401K does not recommend that clients buy or sell any security in which a related person to Intel401K or Intel401K has a material financial interest.

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of Intel401K may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of Intel401K to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. Intel401K will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

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

From time to time, representatives of Intel401K may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of Intel401K to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest; however, Intel401K will never engage in trading that operates to the client's disadvantage if representatives of Intel401K buy or sell securities at or around the same time as clients.

Item 12: Brokerage Practices

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

Intel401K does not recommend brokers/custodians.

1. *Research and Other Soft-Dollar Benefits*

Intel401K receives no research, product, or services other than execution from broker-dealers or custodians in connection with client securities transactions ("soft dollar benefits").

2. *Brokerage for Client Referrals*

Intel401K receives 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*

Intel401K may permit clients to direct it to execute transactions through a specified broker-dealer. If a client directs brokerage, then the client will be required to acknowledge in writing that the client's direction with respect to the use of brokers supersedes any authority granted to Intel401K to select brokers; this direction may result in higher commissions, which may result in a disparity between free and directed accounts; and trades for the client and other directed accounts may be executed after trades for free accounts, which may result in less favorable prices, particularly for illiquid securities or during volatile market conditions. Not all investment advisers allow their clients to direct brokerage.

B. Aggregating (Block) Trading for Multiple Client Accounts

Intel401K does not aggregate or bunch the securities to be purchased or sold for multiple clients. This may result in less favorable prices, particularly for illiquid securities or during volatile market conditions.

Item 13: Review of Accounts

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

Robo-advisory portfolio management accounts are not reviewed by Intel401K, save for automated allocation revisions. Clients are encouraged to update Intel401K of any change in their objectives, risk tolerance, or other pertinent information.

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

Robo-advisory portfolio management accounts do not undergo non-periodic review by Intel401K, allocations will change in accordance with the portfolio management software utilized by Intel401K and changes to the client's profile.

C. Content and Frequency of Regular Reports Provided to Clients

Robo-advisory portfolio management clients will receive at least monthly a written report that details the client's account including assets held and asset value, which report will come from the custodian and at least monthly a written report from Intel401K.

Item 14: Client Referrals and Other Compensation

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

Intel401K does not receive any economic benefit, directly or indirectly from any third party for advice rendered to Intel401K's clients.

B. Compensation to Non - Advisory Personnel for Client Referrals

Intel401K does plan to compensate non-advisory personnel (solicitors) for client referrals.

Item 15: Custody

Intel401K does not take custody of client accounts at any time. Custody of client's accounts is held primarily at the client's custodian. Clients will receive account statements from the custodian and should carefully review those statements for accuracy.

Item 16: Investment Discretion

Intel401K provides 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, Intel401K generally manages the client's account 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.

Item 17: Voting Client Securities (Proxy Voting)

Intel401K will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

Item 18: Financial Information

A. Balance Sheet

Intel401K 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 Intel401K nor its management has any financial condition that is likely to reasonably impair Intel401K's ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years

Intel401K has not been the subject of a bankruptcy petition in the last ten years.