

# O'Toole Strategic Investments LLC Firm Brochure - Form ADV Part 2A

*This brochure provides information about the qualifications and business practices of O'Toole Strategic Investments LLC. If you have any questions about the contents of this brochure, please contact us at (407) 786-4026 or by email at: [caitlin.m.otoole@gmail.com](mailto:caitlin.m.otoole@gmail.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 O'Toole Strategic Investments LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). O'Toole Strategic Investments LLC's CRD number is: 310758.*

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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**

O'Toole Strategic Investments LLC has not yet filed an annual updating amendment using the Form ADV Part 2A. Therefore, there are no material changes to report.

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## Item 4: Advisory Business

O'Toole Strategic Investments LLC (hereinafter "OSIL") is a Limited Liability Company organized in the State of Florida. The firm was formed in August 2020, and the principal owner is Caitlin O'Toole and Sean O'Toole.

### *Selection of Other Advisers Services*

OSIL will direct clients to Symmetry Partners LLC CRD# 120982 (hereinafter "Symmetry"), a third-party investment adviser, to offer a customized suite of portfolios to mutual clients. OSIL will collaborate with Symmetry. OSIL will introduce and assist the client in establishing a relationship with Symmetry. Symmetry utilizes its standard due diligence process, analysis, and investment principles to select the mutual funds and ETFs used in creating these portfolios. Please note, as this is a collaborative effort, Symmetry may need to work within additional constraints and objectives imposed or recommended by the OSIL. Symmetry's services include, but are not limited to, establishing prospective client or client suitability, periodic contacts with clients, answering client inquiries, meeting with or contacting the client at least annually to ascertain if there is a change in the client's financial situation, updating client information, and monitoring client accounts. Symmetry's services include, but are not limited to, teaming with OSIL on portfolio construction, research, trading, back office operations, account maintenance, and assisting IARs in servicing the clients.

OSIL will tailor a program for each individual client. This will include an interview session to get to know the client's specific needs and requirements as well as a plan that will be executed by OSIL on behalf of the client. OSIL may use model allocations together with a specific set of recommendations for each client based on their personal restrictions, needs, and targets. Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent OSIL from properly servicing the client account, or if the restrictions would require OSIL to deviate from its standard suite of services, OSIL reserves the right to end the relationship.

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. OSIL does not participate in any wrap fee programs.

OSIL has the following assets under management:

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

## Item 5: Fees and Compensation

### *Selection of Other Advisers Fees*

<b>Total Assets Under Management</b>	<b>OSIL's Fee</b>	<b>Third Party's Fee</b>	<b>Total Fee</b>
\$0 -\$1,000,000	1.00%	0.40%	1.40%
\$1,000,001 – And Up	0.75%	0.40%	1.40%

OSIL uses an average of the daily balance in the client's account throughout the billing period, after taking into account deposits and withdrawals, for purposes of determining the market value of the assets upon which the advisory fee is based.

The final fee schedule will be memorialized in the client's advisory agreement. Clients may terminate the agreement without penalty for a full refund of OSIL's fees within five business days of signing the agreement. Thereafter, clients may terminate the Investment Advisory Contract generally with 30 days' written notice.

### *Payment of Selection of Other Advisers Fees*

Fees for selection of Symmetry as third-party adviser are withdrawn directly from the client's accounts by Symmetry with client's written authorization. OSIL will receive the portion of the fee earned from Symmetry. Fees are paid quarterly in arrears.

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 OSIL. Please see Item 12 of this brochure regarding broker-dealer/custodian.

OSIL collects its fees in arrears. It does not collect fees in advance.

Neither OSIL 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

OSIL 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

OSIL generally provides advisory services to the following types of clients:

- ❖ Individuals
- ❖ High-Net-Worth Individuals

There is no account minimum for any of OSIL's services.

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

### *Methods of Analysis & Investment Strategies*

OSIL does not manage assets directly, but OSIL will provide clients and all prospects whom OSIL will recommend Symmetry Partners LLC information regarding methods of analysis and investment strategies. This information will be explained in the Part 2A brochure of Symmetry Partners LLC that OSIL will offer to all clients needing portfolio management services.

**Selection of Other Advisers:** Although OSIL will seek to select only money managers who will invest clients' assets with the highest level of integrity, OSIL's selection process cannot ensure that money managers will perform as desired and OSIL will have no control over the day-to-day operations of any of its selected money managers. OSIL would not necessarily be aware of certain activities at the underlying money manager level, including without limitation a money manager's engaging in unreported risks, investment "style drift" or even regulator breach or fraud.

**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

There are no criminal, civil, administrative, or self-regulatory organization proceedings to report.

## Item 10: Other Financial Industry Activities and Affiliations

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

Neither OSIL 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.

Neither OSIL nor its representatives have any material relationships to this advisory business that would present a possible conflict of interest.

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

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

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

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

From time to time, representatives of OSIL may buy or sell securities for themselves at or around the same time they recommend those securities to clients. This may provide an opportunity for representatives of OSIL 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 create a conflict of interest. OSIL 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.

### **Item 12: Brokerage Practices**

OSIL does not trade client's accounts or recommend broker/custodians. OSIL does not trade client's accounts and therefore receives no research, product, or services from a broker-dealer ("soft dollar benefits"). OSIL does not have the ability to block trade purchases across accounts. OSIL receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

### **Item 13: Review of Accounts**

All client accounts for OSIL's advisory services provided on an ongoing basis are reviewed at least Quarterly by Caitlin O'Toole, Managing Member, with regard to clients' respective investment policies and risk tolerance levels. All accounts at OSIL are assigned to this reviewer.

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

Each client of OSIL's advisory services provided on an ongoing basis will receive a quarterly report detailing the client's account, including assets held, asset value, and calculation of fees. This written report will come from the custodian.

### **Item 14: Client Referrals and Other Compensation**

Other than its compensation for its recommendation and engagement of third party investment advisers, OSIL does not receive any economic benefit, directly or indirectly from any third party for advice rendered to OSIL's clients.

OSIL does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

### **Item 15: Custody**

When advisory fees are deducted directly from client accounts at client's custodian, OSIL will be deemed to have limited custody of client's assets and must have written authorization from the client to do so. Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy.

### **Item 16: Investment Discretion**

OSIL does not have discretion over client accounts at any time.

### **Item 17: Voting Client Securities (Proxy Voting)**

OSIL 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**

OSIL neither requires nor solicits prepayment of more than \$500 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

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

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

## **Item 19: Requirements For State Registered Advisers**

OSIL currently has only one management person: Caitlin Marie O'Toole. Education and business background can be found on the individual's Form ADV Part 2B brochure supplement.

Other business activities for each relevant individual can be found on the Form ADV Part 2B brochure supplement for each such individual.

OSIL 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.

There are no civil, self-regulatory organization, or arbitration proceedings to report under this section.

Neither OSIL nor its management persons, has any relationship or arrangement with issuers of securities.