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Form ADV Part 2A – Firm Brochure

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This Brochure provides information about the qualifications and business practices of LTIM, LLC, doing business as MagnifyMoney Advisor (“MMA”, “the Firm”). If you have any additional questions about the contents of this Brochure, please contact MMA at (704) 943-8890 or advisoryinfo@magnifymoney.com. 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. The Firm is a registered investment adviser. Registration as an investment adviser does not imply a certain level of skill or training. Additional information about MMA is available on the SEC’s website at [IAPD - Investment Adviser Public Disclosure - Homepage \(sec.gov\)](https://www.sec.gov/IAPD-Investment-Adviser-Public-Disclosure-Homepage).

Free and simple tools are available for you to review MMA and its financial professionals at [Welcome to Investor.gov/CRS | Investor.gov](https://www.investor.gov/CRS), which also provides free educational materials about broker-dealers, investment advisers, and investing.

Item 2. Material Changes

Since filing the last annual amendment there have been no material changes to the business or this Brochure.

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Item 4. Advisory Business

MMA is a Delaware limited liability company that was formed in 2020 with its principal place of business in Charlotte, NC. MMA is an indirect subsidiary of LendingTree, Inc. (NASDAQ: TREE).

MMA's advisory service is limited to recommending to Clients, unaffiliated, third party, investment managers ("Managers") that MMA believes can assist them in accomplishing their investment objectives. The advisory service is provided through MMA's Recommended Manager Platform ("Platform") that recommends to Clients a list of Managers who have agreed to participate in the Platform. The Managers MMA recommends depends on the type of Managers who participate in the Program and may include large national firms, small regional firms, and in some cases local firms with offices in only one or two locations. Certain Managers are internet-based investment advisers known as robo-advisers. MMA's recommendations are provided through dedicated pages ("the MMA Portal") within LendingTree's MagnifyMoney website. MagnifyMoney is an online platform maintained by LendingTree, LLC (a subsidiary of LendingTree, Inc.) that provides a suite of informative financial resources to help consumers navigate many of the individual offerings that exist in the financial marketplace today.

When visitors to MagnifyMoney navigate to the MMA Portal, they can proceed by answering a series of questions ("Questionnaire"). The Client's specific responses to the Questionnaire result in the creation of a unique profile ("Client Profile") that provides MMA with a basic understanding of a Client's investment objective based on the Client's financial situation, primary financial goal, risk tolerance, and investment horizon. The recommendation (or matching) of Managers to a Client occurs via MMA's proprietary, logic-based technology, that after first verifying certain Client information, evaluates a Client Profile and shows on-screen, a list of recommended Managers or individuals who are Individual Investment Advisers ("IARs") employed by and under the supervision of a Manager that MMA believes can assist the Client achieve their investment objective. Clients will be contacted by those Managers or IARs recommended by MMA. When certain Client information cannot be verified, the Client will not be shown a list of recommended Managers. However, non-verified Clients may be subsequently contacted by Managers and/or IARs who have indicated they will accept non-verified Clients.

MMA does not provide any ongoing or continuous advisory services and has no ongoing or future obligation to Clients once a Manager or IAR has been recommended. MMA only provides the advisory services described above and does not otherwise tailor its advisory

services to any additional needs of a Client. Further, MMA does not recommend specific securities, strategies, or programs offered by Managers. Managers and/or IARs do not have to meet a specific investment performance requirement or have any specific qualifications.

Item 5. Fees and Compensation

Clients do not pay MMA any fees nor do they enter into any agreement with MMA. MMA's only compensation is received from Managers, who as a requirement of participating in the MMA Platform, have agreed to pay MMA a fee ("Service Fee") for each match, whether or not a Client subsequently invests with a Manager. The amount of the Service Fee paid to MMA varies based on several factors that include the amount negotiated with each Manager, the level of contact with the Client, and the amount of a Client's investable assets. This creates a conflict of interest as MMA has an incentive to recommend a Client to as many Managers and IARs as possible. However, this conflict-of-interest is mitigated by MMA's policy that states a Client can only be recommended to a limited number of Managers, which is currently limited to 3 Managers including IARs. In addition and as previously noted, different Managers may pay MMA different Service Fees. This also creates a conflict-of-interest as MMA has an incentive to recommend Clients to Managers paying MMA the highest Service Fee, rather than based solely on a client's needs and investment objective. This conflict-of-interest is mitigated, however, as the proprietary algorithm that determines the recommendation does not consider the Service Fee paid to MMA. Further, MMA's policy requires periodic review of which Managers have been recommended with Clients. MMA also provides Clients a disclosure statement that generally describes the terms of the agreements between MMA and participating Managers.

When a Client invests with a Manager, they will be charged investment advisory fees directly by each Manager. In addition, Clients will usually also pay other expenses associated with investing with a Manager. Clients should carefully review all fee and expense disclosures for each Manager.

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

MMA does not receive performance-based fees.

Item 7. Types of Clients

MMA provides investment advisory services to individuals and high net worth individuals. Although MMA has no minimum asset level threshold to access or use the online Platform, Managers may have minimum threshold levels required to invest with them.

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

In order for a Manager or IAR to be eligible for inclusion in the MMA Platform, the Manager must satisfy MMA's initial due diligence review, which involves MMA confirming that each Manager offers at least one of the services a Client can select when completing the Questionnaire and that the Manager is registered with the SEC. While an individual IAR may be recommended to clients, it is the Manager who employs the IAR and has the regulatory obligation to supervise the IAR's activities that are approved for the Platform. Relevant disciplinary history that is required to be publicly disclosed by the SEC for both Managers and IARs and can be found at [IAPD - Investment Adviser Public Disclosure - Homepage \(sec.gov\)](https://www.investor.gov/iaad). MMA's ongoing due diligence of Managers is limited to periodic monitoring, typically on an annual basis to verify Managers continue to offer necessary services and continue to be registered with SEC. Registration with the SEC does not imply that a Manager or the IARs they may employ have a certain level of skill or training.

Investment Risks

Investing involves risks, including the potential loss of the principal amount invested, which Clients should be prepared to bear. When a Client is recommended to a Manager they will be provided an electronic link where they can access each Manager's Form ADV Part 3 Client Relationship Summary and their Form ADV Part 2A Brochure. When Clients are recommended to an IAR, the link will be to the Manager who employs and supervises the IAR. Clients should carefully read these documents prior to investing with a Manager as they contain important information, including a discussion of the risks associated with investing with the Manager.

Other risks Clients should consider include:

Use of Third-Party Managers. MMA will not have any control over, or responsibility to supervise the investments that Managers make. When a Client invests with more than one Manager, it is important to understand that Managers will make investment decisions independently of each other and at times, may hold economically offsetting positions.

Gains achieved by one or more Managers may be offset by losses incurred by one or more other Managers. Certain Managers will be excluded from MMA's list of Managers when a Client's stated investment amount is below a Manager's minimum for opening a new account.

No Predictive Value of Historical Returns. A Manager's past performance is no guarantee of future results. There is no assurance that any investment strategy will be successful.

Limited Available Information. MMA will not have access to information about the underlying portfolio positions or investment methodologies of each Manager. Clients will depend upon information as furnished by the Manager (in addition to custodians' account statements). Furthermore, the amount of information used by MMA in recommending Managers is limited and may not be timely or complete. MMA does not seek to assess or rank the investment performance of the Managers. As such, MMA may recommend Managers that have underperformed the market or their peers.

Limited Selection of Managers. MMA will provide only a limited subset of all available investment managers in the marketplace. There can be no assurance or guarantee that Managers will outperform other, similar investment managers that do not participate in the MMA Platform.

Electronic Investment Advice. Robo-advisers often only offer internet-based services with little if any personal contact. The investment advice offered by robo-advisers is based on automated platforms that rely on computer programs including algorithms to make investment decisions. There is a risk that these programs and algorithms may not function as intended, and as a result may provide inconsistent results due to several factors which may include but are not limited to coding errors or coding that is not able to sufficiently address unforeseen market conditions such as those caused by geo-political events, substantial oil price fluctuations, or interest rate changes. Such programs and algorithms may also generate rebalancing errors and other trade errors.

Direct Investing may be Less Expensive. Clients meeting the eligibility conditions imposed by Managers, including minimum initial investments, could invest directly with the Managers. Such a direct investment might be subject to more favorable terms.

Natural Disasters, Epidemics, Pandemics and Terrorist Attacks. Areas in which MMA and/or Managers have offices or otherwise do business are susceptible to natural disasters (e.g., fire, flood, earthquake, storm, and hurricane) and epidemics, pandemics or other outbreaks of serious contagious diseases (e.g., COVID-19, influenza, MERS,

etc.). The occurrence of a natural disaster, or epidemic or pandemic, could adversely affect and severely disrupt the business operations, economies, and financial markets of many countries (even beyond the site of the natural disaster or epidemic), and could adversely affect the Firm's or individual Managers' investment programs and their ability to do business. In addition, terrorist attacks, or the fear of or the precautions taken in anticipation of such attacks, could, directly or indirectly, materially or adversely, affect certain industries in which Managers invest, or could affect the areas in which the Firm or individual Managers have offices or do business. Other acts of war (e.g., war, invasion, acts of foreign enemies, hostilities, and insurrection, regardless of whether war is declared) could also have a materially adverse impact on the financial condition of industries or countries in which Managers invest.

Item 9. Disciplinary Information

All investment advisers registered with the SEC are required to disclose certain material facts regarding any legal or disciplinary events that would be material to a Client's evaluation of an investment adviser or the integrity of its management, including to MMA. Neither MMA nor its management persons have any reportable events to disclose. Clients are encouraged to access [IAPD - Investment Adviser Public Disclosure - Homepage \(sec.gov\)](https://www.investor.gov/iaad) where they can review information about each Manager, IAR, and MMA including to the extent applicable, any relevant disciplinary history.

Item 10. Other Financial Industry Activities and Affiliations

An MMA affiliate, LendingTree, LLC, is a web-based marketing lead generator and a licensed mortgage broker. LendingTree, LLC is an online loan marketplace for various financial borrowing needs including mortgages, auto loans, small business loans, personal loans, and more. LendingTree, LLC also offers comparison services for sourcing other products and services. All MMA employees, except for its Chief Compliance Officer are also employees of LendingTree, LLC and have responsibilities to that entity.

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

MMA has adopted a Code of Ethics pursuant to Rule 204A-1 under the Advisers Act that describes MMA's standard of business conduct and fiduciary duty to Clients. The Code of Ethics is designed to ensure that the activities and interests of its supervised persons will not interfere with making and implementing decisions in the best interest of Clients,

while allowing supervised persons to invest for their own accounts. Supervised persons may invest with the same investment managers that participate in MMA's Platform. All supervised persons must acknowledge the terms of the Code of Ethics annually and as amended.

A copy of MMA's Code of Ethics is available to Clients and prospective Clients upon request by contacting MMA by phone at (704) 943-8890 or by email at advisoryinfo@magnifymoney.com. MMA also encourages Clients to review the code of ethics of each Manager they invest with.

Item 12. Brokerage Practices

MMA does not make transactions on behalf of Clients, or select or recommend broker-dealers, or custodians. MMA does recommend Managers who may also be registered as a broker-dealer, or who may in turn recommend broker-dealers, or custodians in connection with the investment advisory services they provide to Clients. Clients should carefully review the brokerage and custodial practices, along with the associated fees utilized by each Manager.

Item 13. Review of Accounts

MMA does not manage assets on behalf of Clients and therefore does not have accounts to review.

Item 14. Client Referrals and Other Compensation

MMA receives compensation as described in Item 5 when a Client is recommended to a Manager or IAR. Each Client will receive a disclosure statement describing the significant terms of the agreement between MMA and the Manager.

Item 15. Custody

MMA does not have custody of Client assets as it does not accept, maintain, or have the authority to obtain possession of any Client assets.

Item 16. Investment Discretion

MMA does not manage or exercise discretion over Client assets.

Item 17. Voting Client Securities

MMA does not manage Client assets, does not accept proxy voting authority for any Client, and does not provide advice regarding proxy solicitations. MMA does not participate in class actions on behalf of Clients. Clients are encouraged to understand each Managers proxy voting policies and procedures.

Item 18. Financial Information

MMA is not required to provide any financial information.