

Part 2A of Form ADV: Firm Brochure  
Item 1 Cover Page

**Intero Financial Planning, LLC**  
**19025 York Road**  
**Parkton, MD 21120**  
**CRD No. 304573**

This brochure provides information about the qualifications and business practices of Interio Financial Planning, LLC. If you have any questions about the contents of this brochure, please contact us at 410-458-6098 or [tom@interofp.com](mailto:tom@interofp.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. Additional information about Interio Financial Planning, LLC also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Interio, LLC's registration as an investment adviser does not imply a certain level of skill or training.

Effective Date: March 24, 2020

## Item 2 Material Changes

**Last amendment date:** March 23, 2020

### Summary of Material Changes

This section will be updated as required in the event any material changes are made to the Intero Financial Planning, LLC Firm Brochure (the “Brochure”):

- As of December 31, 2019, Intero has \$1,751,152 in assets under management (“AUM”) on a discretionary basis and \$0 in AUM on a non-discretionary basis. Clients may request more current information at any time by contacting our firm.

### Delivery Requirements

We will provide a summary of any material changes to this Brochure to our clients at least annually, within 120 days of our fiscal year end. Furthermore, we will provide our clients with other interim disclosures about material changes as necessary.

A complete copy of our current Form ADV Part 2A and/or 2B may be requested free of charge by contacting us by telephone at 410-458-6098 or by email at [tom@interofp.com](mailto:tom@interofp.com).

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## Item 4 Advisory Business

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### FIRM DESCRIPTION

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Intero Financial Planning, LLC (hereinafter referred to as “Intero”, “we”, “us”, or “our firm”) is a Maryland limited liability company with its principal office located in Parkton, MD and has been in business as a registered investment adviser since 2019. The principal owner of the firm is Thomas Vincent Bonvissuto (“Tom Bonvissuto”).

As a registered investment adviser, we are a fiduciary to you, our client, meaning we have a fundamental obligation to act and provide investment advice that is in your best interest. Should any material conflicts of interest exist that might affect the impartiality of our investment advice, they will be disclosed to you in this Brochure. We urge you to review this Brochure carefully and consider our qualifications, business practices and the nature of our advisory services before becoming our client.

As of December 31, 2019, Intero has \$1,751,152 in assets under management (“AUM”) on a discretionary basis and \$0 in AUM on a non-discretionary basis. Clients may request more current information at any time by contacting our firm.

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### ADVISORY PROGRAMS

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Intero provides investment management to our clients. In connection with our investment management services, Intero provides advice with respect to a broad range of asset classes, including equities (common stocks and equivalents), mutual funds, exchange traded funds, fixed income instruments, and certificates of deposit. Our advice is generally limited to these types of investments, but we reserve the right to advise or not advise our clients on certain investments should we deem it appropriate based on their particular circumstances.

Our advisory services are offered through certain individuals who have registered with Intero as its investment adviser representatives (“advisors”). Clients should refer to such advisor’s Form ADV Part 2B (the “Brochure Supplement”) for more information about their qualifications.

Intero’s advisory services are tailored to the needs of our clients based on their individual investment objectives, risk tolerance, cash or income needs, and any investment restrictions. Although Intero seeks to accommodate any reasonable investment restrictions or guidelines set by our clients, we may decline to accommodate certain investment restrictions that are incompatible with our firms’ investment philosophy or that may have an adverse effect on our ability to manage your account.

Intero enters into formal written agreements with our clients setting forth the terms and conditions under which we will provide our advisory (the “Investment Management Agreement”), consulting (the “Investment Consulting Agreement”) or financial planning services (the “Financial Planning Agreement”). The Investment Management Agreement, Investment Consulting Agreement, and Financial Planning Agreement set forth the scope of the services to be provided and the compensation we receive from the client for such services. The Investment Management Agreement, Investment Consulting Agreement, and Financial Planning Agreement may be terminated by either party in writing at any time by giving thirty (30) days signed written notice to the other party.

Our advisors may offer all or any combination of the advisory services described below to our clients:

**Investment Management.** Intero provides investment management services where client portfolios are managed according to the client’s stated investment goals and objectives. Working closely with an advisor, clients will establish realistic and measurable investment goals and objectives to meet those goals will be defined. An advisor will recommend that clients allocate their investment portfolio among various asset classes, then once the appropriate asset allocation has been determined, the portfolio will be monitored and rebalanced on an ongoing basis as changes in market conditions and client circumstances occur. As part of these investment management services, we have an ongoing responsibility to select and make recommendations to our clients as to specific securities or other investments that may be purchased or sold for a client’s portfolio.

Intero generally exercises discretionary authority over client investments where we manage the client’s account(s) without client consultation after the initial establishment of the client’s investment objectives and appropriate asset allocation. Intero receives discretionary authority from our clients through our Investment Management Agreement at the outset of our advisory relationship. We generally do not manage accounts on a non-discretionary basis. We may, however, from time to time make an exception upon client request.

#### **Financial Planning and Consulting Services.**

**Financial Planning.** Intero provides financial planning services where an advisor will work with clients to review their current financial position, stated goals and objectives and will make recommendations on how clients can manage their financial resources based on an analysis of their individual needs. Recommendations may be in the form of a written financial plan or a verbal consultation based on the type of engagement. The client is under no obligation to act upon the advisor’s recommendations. If the client elects to act on any of our recommendations, the client is under no obligation to affect their transactions through our firm.

**Financial Consulting.** Intero Financial Planning provides on-going financial consulting services where an advisor will work with clients to update their financial plan on a continuous basis to reflect changes in client circumstances, goals and financial behaviors. Periodic meetings with clients will identify any such changes, and clients will work with an advisor to update the financial plan accordingly with revisions to any of the following: net worth, cash flow, debt management, college savings, credit scores, estate planning, financial goals, insurance, investments, mortgage analysis, retirement planning, risk management, and tax strategies.

The advisor will review the client's financial profile objectives and constraints and provide on-going advice as requested by the client on specific areas of concern mutually agreed upon between the adviser and the client.

These services do not include investment implementation or on-going investment supervision, monitoring, or reporting services. Investment management services may be obtained from Intero Financial Planning through a separate investment management agreement or through a separate professional investment advisor of the client's choosing. The client is under no obligation to act upon their advisor's recommendations. If the client elects to action on any of our recommendations, the client is under no obligation to effect their transactions through our firm.

Financial consulting services will be considered to be complete upon a final face-to-face meeting to establish the client's independent forward action plan and will take place at the client's request to end the consulting relationship, which is at the discretion of the client.

**Information related to tax and legal consequences that is provided as part of the financial plan is for informative purposes only and should not be considered tax or legal advice. Clients should contact their tax and/or legal advisor for personalized advice.**

**Educational Seminars/Workshops.** Intero Financial Planning offers educational seminars to the public. Workshops are always offered on an impersonal basis and do not focus on the individual needs of the participants.

**Wrap Fee Programs.** Intero does not participate in any wrap fee programs.

**Important Note:** It is the client's responsibility to ensure that Intero is promptly notified if there are ever any significant changes to their financial situation, goals, objectives or needs so we can review our previous recommendations and make any necessary adjustments.

## Item 5 Fees and Compensation

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### ADVISORY FEES

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The following information describes how Intero is compensated for the advisory services we provide to our clients. The specific manner in which fees are charged and the compensation we receive may differ between clients depending upon the individual Investment Management Agreement and Financial Planning Agreement with each client. Intero reserves the right to negotiate our compensation with clients depending on the scope of our advisory relationship, and we may charge higher or lower fees than are available from other firms for comparable services. Intero has the general discretion to waive all or a portion of our fees, but typically only exercises this discretion for our employees.

**Investment Management Fees.** In consideration for providing investment management services and pursuant to the Investment Management Agreement with the client, Intero charges an annualized asset-based fee equal to **1 %**, based on the client’s assets under management (“AUM”) as valued by the custodian, on the last day of the previous month. The maximum investment management fee charged by Intero is **\$20,000** (annually) per client. Fees are negotiated with each client based on a variety of factors, such as the amount of assets being managed, future deposits to the accounts under our management, the level and type of services provided and/or the nature of the relationship with the client. Please refer to the formula for calculating the annualized management fee below:

**Step 1.**

$$\frac{([\text{Annualized Percentage}] \times \$[\text{Previous Day's Assets Under Management}])}{[\text{Number of Trading Days Per Year}]} = \$[\text{Previous Day's Fee}]$$

**Step 2.**

$$[\text{Add the Daily Fees for Each Trading Day of the Month}] = \$ [\text{Monthly Payment}]$$

**Example.** Please see an example of the formula for calculating the Investment Management Fee(s) over a four-day period below:

STEP 1		
Day 1	$(0.01 \times \$100,000) / 252 =$	\$3.97
Day 2	$(0.01 \times \$100,500) / 252 =$	\$3.99
Day 3	$(0.01 \times \$100,700) / 252 =$	\$4.00
Day 4	$(0.01 \times \$100,600) / 252 =$	\$3.99
Step 2		
<b>Total Fee</b>	$\$3.97 + \$3.99 + \$4.00 + \$3.99 =$	\$15.95

KEY	
Annualized Percentage	1%
Assets Under Management	\$100,000
# of Trading Days Per Year	252

Investment Management Fees are calculated on an annualized basis but will be billed and payable monthly in arrears. Clients must authorize the deduction of our fees from their managed accounts by the qualified custodian, Interactive Brokers, and choose the method by which our fees will be calculated. Clients may elect to have our advisory fees calculated by our firm or

Interactive Brokers and deducted from their accounts. Clients may make the election to have our advisory fees calculated either by our firm or Interactive Brokers and deducted from their accounts at any point in time while their account is open with Interactive Brokers, including the account application process with Interactive Brokers. Clients have the ability to cancel the election our advisory fees calculated by either our firm or Interactive Brokers and deducted from their accounts at any time. All fees will be supported by an invoice to the client itemizing the fee. Intero does not withdraw fees directly from clients' accounts.

Any advisory fees deducted from the client's account are reflected on the client's periodic activity statements as well as the client's account management window when they log in to their account. The periodic activity statement also specifies the calculation method. Moreover, our firm will instruct Interactive Brokers to send each client an invoice each time a fee is charged. This invoice reflects the fee charged, the fee calculation methodology, and the period covered by the fee. Please refer to Item 15 of this Brochure for more information.

Intero has instituted the following safeguards when advisory fees are deducted directly from a client's custodial account:

- We shall obtain written authorization from the client to deduct our advisory fees from their account(s) held with the qualified custodian;
- Each time a fee is deducted from the client's account(s) at the qualified custodian, we shall send the qualified custodian an invoice or statement of the amount of the fee to be deducted from the client's account; and
- We shall, concurrently with the invoice sent by the qualified custodian, send the client an invoice or statement itemizing the fee. Itemization includes the formula used to calculate the fee, the value of the assets under management on which the fee is based, and the time period covered by the fee.

Intero is deemed to have limited custody solely because advisory fees are directly deducted from client's account by the custodian on behalf of Intero.

**Financial Planning and Consulting Fees.** Intero Financial Planning provides initial consultations for our financial planning services. Intero Financial Planning charges flat fee of \$3,000 for financial planning services and an hourly fee of \$300 for on-going financial consulting services. Our financial planning and consulting fees are billed separately as unique services. The total estimated fee, as well as the ultimate fee that we charge the client is based on the scope and complexity of the services provided.

**Financial Planning Fees.** We charge a fixed fee of \$3,000 for the development of our clients' initial financial plans. Our Financial Planning Fee is invoiced to the Client upon

completion and presentation of the Client's financial plan and due to Adviser within thirty (30) days of the invoice date. Financial planning services will be considered complete at the presentation of the final plan in a face-to-face meeting with the client, at which point a physical copy of the plan will also be provided to the client.

**Financial Consulting Fees.** We charge an hourly fee of \$300 an hour for our financial consulting service. Our Financial Consulting Fee is invoiced to the Client on a monthly basis in arrears and due to Adviser within thirty (30) days of the invoice date. Financial consulting services will be considered to be complete upon a final face-to-face meeting to establish the client's independent forward action plan and will take place at the client's request to end the consulting relationship, which is at the discretion of the client.

**Educational Seminars.** Our advisory Representatives may host seminars on various financial topics that may encourage clients to seek investment advisory services or insurance products. Fees for seminars are \$100 per session per participant.

**Additional Fees and Expenses.** Clients will incur transaction charges and/or brokerage fees when purchasing or selling securities. These charges and fees are typically imposed by the broker-dealer or qualified custodian through which account transactions are executed. For more information on our brokerage practices, please refer to Item 12 (Brokerage Practices) of this Brochure.

The fees that clients pay to our firm for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and/or exchange traded funds (described in each fund's prospectus) to their shareholders. The fees charged directly by mutual funds and exchange traded funds will typically include a management fee and other fund expenses.

To fully understand the total costs associated with their investment portfolio, clients should review all the fees charged by mutual funds, exchange traded funds, our firm and others.

**Termination.** The Investment Management Agreement, Investing Consulting Agreement, or Financial Planning Agreement with our clients may be terminated by either party at any time upon thirty (30) days written notice. Upon termination of our status as the client's investment adviser, Intero will not take any further action with respect to the client's account(s) unless specifically notified by the client in writing. Clients will be responsible for instructing their custodian and monitoring their account for the final disposition of assets.

Upon receipt of a proper notice of termination from the client, as described in the Investment Management Agreement and Financial Planning Agreement, any earned unpaid fees will be billed on a pro-rata basis based on the amount of work performed by us up to the point of termination.

For Pennsylvania clients, when a copy of the Brochure Document(s) is not provided to the client at least 48 hours prior to signing the contract(s), client has five business days in which to cancel the contract, without penalty.

**Brokerage Commissions.** Intero does not receive brokerage commissions from the sale of securities or other investment products. Our compensation for recommending securities and investment products is limited to the advisory fees described above.

**ERISA Accounts:** Intero is deemed to be a fiduciary to advisory clients that are employee benefit plans or individual retirement accounts (IRAs) pursuant to the Employee Retirement Income and Securities Act ("ERISA"), and regulations under the Internal Revenue Code of 1986 (the "Code"), respectively. As such, our firm is subject to specific duties and obligations under ERISA and the Internal Revenue Code that include among other things, restrictions concerning certain forms of compensation.

Any material conflicts of interest between clients and Intero or our employees are disclosed in this Brochure. If at any time, additional material conflicts of interest develop, Intero will provide our clients with written notification of those material conflicts of interest or an updated Brochure.

## Item 6 Performance-Based Fees

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### PERFORMANCE BASED FEES

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Intero does not charge our clients fees based on a share of capital gains on or capital appreciation of the assets in their accounts.

## Item 7 Types of Clients

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### TYPES OF CLIENTS

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Intero offers investment advisory services to a diversified group of clients including individuals, high net worth individuals, pension and profit-sharing plans (other than plan participants), charitable/non-profit organizations, corporations and other business entities. Client relationships may vary in scope and length of service.

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### ACCOUNT REQUIREMENTS

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Intero generally does not require a minimum account balance for our investment management services. However, Intero in its sole discretion may require a minimum account balance

requirement based on various criteria (i.e., anticipated future additional assets to be managed, related accounts, account composition, negotiations with the client, etc.).

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

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### **METHODS OF ANALYSIS**

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The securities analysis methods employed by Intero may include fundamental analysis and technical analysis and economic analysis. Our main sources of information include financial newspapers and magazines, research materials prepared by others, corporate rating services, timing services, annual reports, prospectuses, filings with the SEC, and/or company press releases.

#### **Fundamental Analysis.**

Fundamental analysis maintains that markets may misprice a security in the short run, but that the “correct” price will eventually be reached by the market. The fundamental analysis of a business involves analyzing businesses: financial statements and health, management and competitive advantages, and competitors and markets. When applied to futures and forex, it focuses on the overall state of the economy, interest rates, production, earnings, and management.

#### **Technical Analysis.**

Technical analysis maintains that all information is already reflected in the stock price. Technical analysis is a discipline for forecasting the direction of prices through the study of past market data, primarily price and volume. Generally, technical analysis employs models and trading rules based on price and volume transformations, such as the relative strength index, moving averages, regressions, inter-market and intra-market price correlations, business cycles, stock market cycles or, classically, through recognition of chart patterns.

Our methods rely on the assumption that the companies whose securities we purchase and sell, the rating agencies that review these securities, and other publicly-available sources of information about these securities, are providing accurate and unbiased data. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

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### **INVESTMENT STRATEGIES**

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The bedrock of working with Intero Financial Planning is Financial Planning. We will cover 7 main areas of planning - Cash Flow & Investing, Retirement, Company Benefits, Children & College Planning, Estate & Aging, Risk Management, and Taxes. The process includes establishing and defining our client-planner relationship, gathering your data including goals, analyzing and evaluating your current financial status, developing and presenting recommendations and/or alternatives, implementing the recommendations, and monitoring the recommendations. Our hope is that we will be in a long-term ongoing relationship.

The financial planning process will inform the Investment Strategy for each client. An analysis is done of the income needs and sources. Different types of accounts and income sources will have different tax consequences and time frames. Based on this information different assets may be placed in different accounts (asset location) in order to develop an overall mix that meets the goals of the client.

The investment portfolio (s) used will depend on a variety of factors including the size of the assets, current holdings (low basis, client directed, etc.), comfort level of the client, tax treatment of the account/assets, client tax situation, etc.

Multiple allocation portfolios are used to fulfill the above needs. The portfolios are driven by their target allocation to equities, with the remainder in bonds and cash vehicles. Aggressive Growth – Target 100% Equities, Growth & Income – Target 75% Equities, Balanced – Target 50% Equities, Income & Growth – Target 25% Equities, Conservative – Target 0% Equities. It is expected that the portfolios will be comprised of ETFs (Exchange Traded Funds) and/or Open- and/or Closed- End Mutual Funds.

These allocation portfolios are constructed with longer-term (10-20 year) timeframes in mind. They are strategically allocated to various ETFs and Mutual Funds, based on their exposure to different markets (US vs. International, Large vs. Mid/Small Caps, Sectors, Factors, etc.) The manager will only buy long positions and will be biased to the US Market in overall allocation. Additionally, the manager has a bias towards passive vehicles for equities and active managers in bonds. The allocation is derived based on the advisor's education and experience and ongoing due diligence. Funds and Managers are selected based on a variety of factors including consistency of process, demonstrated skill and performance, fees and potential value added. Additionally, when appropriate – sub advisors may be utilized to provide individual securities (such as stocks and bonds). These portfolios would be segregated, yet factored into the overall asset mix.

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## **RISK OF LOSS**

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Any investment carries a certain degree of risk, including a possible loss of principal that clients should be prepared to bear. The value of securities used in all of our strategies may go up or down in response to factors not within our control, such as but not limited to, the status of an individual company underlying a security, or the general economic climate. There is no guarantee that any of the investment strategies that our firm employs will outperform the investment strategies used by other firms. Past performance is no guarantee of future results.

Risk management is integrated into our process through the use of appropriate risk levels on each position, diversified allocation between assets and strategies, and when appropriate, limiting the risk of extreme market moves through hedges.

The investment risks described below may not be all-inclusive but should be considered carefully:

**Fundamental Analysis.** Fundamental Analysis concentrates on factors that determine the long-run or equilibrium intrinsic value of securities. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value or that the perceived value was deficient, incomplete, or affected by unforeseen factors. Our methods rely on the assumption that the companies whose securities we purchase and sell, the rating agencies that review these securities, and other publicly-available sources of information about these securities, are providing accurate and unbiased data. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

**Technical Analysis.** Technical Analysis uses past price and volume history to make predictions about future prices. The risk associated with this analysis is that predicted movements of future prices do not fall within expectations garnered from past data.

In addition to risks related to securities analysis, there are specific risks inherent to the types of securities our firm invests in. Our firm may invest in domestic and foreign equities, options, exchange traded funds, fixed income, and use foreign currencies, all of which may carry a variety of risks, as set forth here:

**Equities.** Equity, such as common stocks, represents ownership interest of the issuer. Equities can decline in value over short or extended periods as a result of changes in a company's financial condition, changes in the overall market, and economic and political conditions. Political risk may be of higher concern for foreign equities. Adverse changes in exchange rates may also lower returns on foreign equities.

**Fixed Income.** Fixed income securities pay a predetermined amount of cash by the issuer to the security holder. A risk associated with fixed income is that the issuer may not be able to make interest and principal payments when due. Generally, the lower the credit rating of a security, the greater is the risk that the issuer will default on its obligation. If a rating agency gives a debt security a lower rating, the value of the debt security will decline because investors will demand a higher rate of return. As nominal interest rates rise, the value of fixed income securities is likely to decrease. The amount of decrease is more pronounced for higher duration fixed-income (i.e. those making payments farther in the future). Higher duration fixed-income will also typically exhibit higher price volatility. A nominal interest rate is the sum of a real interest rate and an expected inflation rate, and as such, for fixed real rates, rising inflation may lower the value of fixed income securities in addition to eroding the purchasing power of the fixed payments.

**Options.** Option contracts reach a terminal value depending on the underlying security at an expiration date. There is a risk that the option may have no value at expiration, and the option holder loses the total amount invested. Options may involve certain costs and risks such as liquidity, interest rate, market, credit, and the risk that a position could not be closed when most favorable. Trading halts in the underlying security, or other trading conditions (for example, volatility, liquidity, systems failures) may cause the trading market for an option (or all options) to be unavailable, in which case, the holder or writer of an option would not be able to engage in a closing transaction and an option writer would remain obligated until expiration or assignment. Even if the market is available, there may be situations when options prices will not maintain their customary or anticipated relationships to the prices of the underlying interests and related interests. Disruptions in the markets for the underlying interests could also result in losses for options investors. This is not intended to be an exhaustive presentation of all risks associated with trading options and clients should review the current Options Clearing Corporation (“OCC”) disclosure document “Characteristics and Risks of Standardized Options” and any options risk disclosures provided by the broker-dealer used for client trades.

**Exchange Traded Funds.** Exchange-traded funds (“ETFs”) are a type of index fund bought and sold on a securities exchange. The risks of owning an ETF generally reflect the risks of owning the underlying securities they are designed to track, although lack of liquidity in an ETF could result in it being more volatile and ETFs have management fees that increase their costs. ETFs are also subject to other risks, including: (i) the risk that their prices may not correlate perfectly with changes in the underlying index; and (ii) the risk of possible trading halts due to market conditions or other reasons that, in the view of the exchange upon which an ETF trades, would make trading in the ETF inadvisable. Intero may invest in ETFs with underlying securities in equity, fixed income (short and long duration), options, and foreign currencies. Some of the risks associated with these securities have been noted above. In addition, Intero may invest in ETFs having commodities and precious metals, or futures of these, as underlying securities. Risks with these assets are described in more detail below.

***Investors should be aware their investment is not guaranteed and understand that there is a risk of loss of value in their investment.***

## Item 9 Disciplinary Information

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### REQUIRED DISCLOSURES

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Our firm and our management persons have not been involved in any legal or disciplinary events that would have a material adverse effect on the integrity of our management or the services we provide to our clients.

## Item 10 Other Financial Industry Activities and Affiliations

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### OUTSIDE BUSINESS ACTIVITIES

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Neither Intero nor any of its employees are registered, or have an application pending to register, as a broker-dealer or registered representative of a broker dealer, futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

**Note:** Mr. Bonvissuto has been serving as a trustee for Sheppard Pratt Investment Inc. since June 2016. He spends one hour per month, outside of US trading hours, reviewing investments related to the organization with other trustees and investment consultants. As a trustee, Mr. Bonvissuto acts in an independent capacity from our advisory business.

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### AFFILIATED ENTITIES

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Intero does not have any business relationships with other entities that create a material conflict of interest for our clients.

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### OTHER INVESTMENT ADVISERS

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Intero does not have any business relationships with other investment advisers that create a material conflict of interest for our clients.

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### ISSUERS OF SECURITIES

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Mr. Bonvissuto, Managing Member of Intero, is employed part-time as a driver with UBER Technologies Inc. (UBER) , a U.S. publicly traded company. Mr. Bonvissuto is also employed part-time as a driver with Lyft Inc. (LYFT), a U.S. publicly traded company.

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

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### CODE OF ETHICS

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Intero has adopted a Code of Ethics (the “Code”) that sets forth a standard of business conduct for our firm and all our associated persons. The purpose of the Code is to set out ideals for integrity, objectivity, competence, fairness, confidentiality, professionalism and diligence for our firm and our associated persons to espouse in the interest of our clients and investor protection. The Code includes provisions relating to the confidentiality of client information, a prohibition on

insider trading, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All employees of Intero are required to handle their personal securities transactions in such a manner as to avoid any actual or potential conflicts of interest or any abuse of position of trust and responsibility. Annually, we require all employees to certify that they have read, understand and will comply with the Code.

Clients and prospective clients may request a full copy of our firm's Code of Ethics by contacting our firm in writing at Intero Financial Planning, LLC, 19025 York Road, Parkton, MD 21120 or calling our firm at 410-458-6098.

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## **PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS**

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Intero and/or our advisors do not recommend securities to our clients in which Intero and/or our advisors has a material financial interest.

Intero and/or our advisors may invest in the same securities that are recommended to and/or purchased for our clients. At no time, however, will our firm or our employees receive preferential treatment over our clients. In an effort to mitigate the inherent conflicts of interests involving employees' personal trading activities, the Code requires that our employees report their personal securities transactions and holdings to our firm. We may also restrict or prohibit employees' transactions in specific securities transactions if the employees' transaction disadvantages the client.

Intero has adopted procedures designed to assure that the personal securities transactions, activities and interests of Intero and/or our advisors will not interfere with our ability to make investment decisions in the best interest of our clients.

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## **PERSONAL TRADING**

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Intero maintains and enforces written policies and procedures reasonably designed to prevent the misuse of material non-public information by our firm or any access persons of our firm with regards to their personal securities transactions. Personal trading activities are continually monitored to reasonably prevent conflicts of interest between our firm and our clients.

## Item 12 Brokerage Practices

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### SELECTION OF BROKER-DEALERS

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Securities transactions are generally executed through Interactive Brokers, LLC. (“Interactive Brokers”), member FINRA/SIPC/NYSE. Interactive Brokers maintains custody of our clients’ assets and effects securities transactions for our investment management clients’ accounts. Intero is independently owned and operated and is not affiliated with or a related person of Interactive Brokers.

Intero considers a number of factors prior to recommending a particular broker-dealer to our clients, including but not limited to, their familiarity with the securities to be sold or purchased, their execution skills, order-flow capabilities, their commission rates or other fee schedules, their custodial services, their level of net capital (financial strength) and excess SIPC and other insurance coverage. The commissions charged by Interactive Brokers are competitive with similarly situated retail broker-dealers offering the same variety of securities to clients. Clients are advised, however, that they may be able to effect transactions in securities through other broker-dealers at lower commission rates, particularly with respect to securities listed on a national securities exchange or in the over-the-counter market.

**Research and Other Soft Dollar Benefits.** Interactive Brokers offers products or services other than execution that assist our firm in managing and administering client accounts. These may include software and other technology that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts), facilitate payment of our fees from clients’ accounts, and assist with back office functions, record keeping and client reporting. These services may be used to service all or a substantial number of client accounts, including accounts not maintained at Interactive Brokers.

Intero may also receive services from Interactive Brokers or its affiliates that are intended to help our firm manage and further develop our business. These services may include registration support through Greenwich Compliance, website design and technology support. Interactive Brokers also has arrangements with various product vendors, which enable our firm to purchase their products at a discount. These products may include such items as: client reporting and consolidated statement software; client communication software; client relationship management software; compliance assistance; and investment research.

Our firm routinely compares order execution disclosure information at Interactive Brokers to other broker-dealers to ensure that Interactive Brokers remains competitive in providing best execution for our clients’ securities transactions. Although the brokerage commissions and/or transaction fees charged by Interactive Brokers may be higher or lower than those charged by other broker-dealers, in seeking best execution for our clients our firm strives to ensure that our

clients pay brokerage commissions and/or transactions fees which we have determined, in good faith, to be reasonable in relation to the value of the brokerage and other services provided by Interactive Brokers. Intero may receive a benefit because we do not have to produce or pay for certain research, products or services and accordingly may have an incentive to select or recommend a broker-dealer based on your interest in receiving the research or other products or services, rather than strictly on your clients' interest in receiving most favorable execution.

**Brokerage for Client Referrals.** Intero does not consider broker-dealer or third-party referrals in selecting or recommending broker-dealers to our clients as this would create a conflict of interest.

**Directed Brokerage.** While Intero generally recommends that clients direct transactions through certain broker-dealers, we do not have discretionary authority to determine the broker-dealer to be used for the purchase or sale of securities for client accounts or the commission rates paid to a broker-dealer for client securities transactions.

In rare cases, Intero may utilize other broker-dealers when requested by the client. Clients of Intero must be aware that if they direct us to use a particular broker-dealer that it may limit our ability to achieve best execution or limit their participation in block trading. As a result, clients may pay higher commissions, have higher transaction costs, or receive less favorable prices. In situations where the client directs us to effect their transactions through a particular broker-dealer, we require such directions to be in writing.

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## **TRADE AGGREGATION**

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Investment decisions deemed appropriate for one client may also be deemed appropriate for other clients so that the same security may be purchased or sold at or about the same time for more than one client. When this is the case our firm may, but is not obligated to, aggregate similar trades for multiple clients and execute the trade as a single block.

When transactions are so aggregated, the securities purchased or sold will be allocated in a fair and equitable manner. Our trade allocation procedures seek to allocate investment opportunities among our clients in the fairest possible way taking into account their best interests. These procedures ensure that allocations do not involve a practice of favoring or discriminating against any client or group of clients. Transactions are usually aggregated to seek a more advantageous net price and/or to obtain better execution for all clients. Nevertheless, there is no assurance that the aggregation of transactions will benefit all clients equally, and in some instances combined orders could adversely affect the price or volume of a security. Also, it is possible that we may not aggregate trades in circumstances where it would be beneficial to do so.

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**TRADE ERRORS**

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From time to time, our firm may make a trade error when servicing a client's account. When this occurs, we will correct the trade as soon as we discover the error. Trading errors will be corrected at no cost to clients. In most cases, we will correct trade errors via our executing broker-dealer's trade error desk. If there is a cost associated with this correction, such cost is borne by Intero and not the client. Note that we do not credit accounts for market losses unrelated to our error.

## Item 13 Review of Accounts

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**ACCOUNT REVIEWS**

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Intero conducts account reviews on at least an annual basis for clients subscribed to our investment management services. The frequency of the review depends upon a variety of factors such as: the client's risk profile, activity in the account, economic and market conditions, and the client's preferences, if any. Additional reviews may be triggered by changes in the investment objectives or guidelines for a particular client or specific arrangements with the client.

Formal client review meetings are generally conducted on a regular basis at intervals mutually agreed upon by the advisor and the client, but no less than annually. During these reviews, any changes in the client's investment objectives are discussed so we can review our previous recommendations and make any necessary adjustments.

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**ACCOUNT REPORTS**

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Those clients to whom Intero provides investment management services receive at least quarterly reports from our firm summarizing their account(s) and investment results. Reports may be furnished in writing or electronically as requested by the client. Clients are urged to compare the account statements they receive from their custodian to any written reports received from our firm.

Clients have direct and continuous access to their account information and related documents via the password-protected website of the qualified custodian with which their accounts are held.

## Item 14 Client Referrals and Other Compensation

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**CLIENT REFERRALS**

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Intero does not compensate third-parties (or "solicitors") to promote the investment advisory services offered by our firm, because the solicitor would have to satisfy requirements under Rule

206(4)-3 of the Advisers Act or similar state rules regarding solicitation arrangements before a cash referral fee could be paid to them.

It is our firm's policy not to compensate clients for referring potential clients to our firm, because the client would be considered a solicitor and would have to satisfy requirements under Rule 206(4)-3 of the Advisers Act or similar state rules regarding solicitation arrangements before a cash referral fee could be paid to them.

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## **OTHER COMPENSATION**

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Intero does not receive an economic benefit from anyone who is not a client in exchange for our provision of investment advice or other advisory services.

## **Item 15 Custody**

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### **CUSTODY OF CLIENT FUNDS AND SECURITIES**

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Interactive Brokers is the qualified custodian and maintains custody of client funds in separate brokerage account(s) for each client under the client's name. Interco personnel may assist the client in preparing paperwork to open a new brokerage account at Interactive Brokers, but only the client is permitted to authorize, by their signature, the opening of the account. Interactive Brokers sends an account-opening letter to each client at their physical mailing address after the account is approved.

Interco is deemed to have limited custody solely because advisory fees are directly deducted from client's account by the custodian on behalf of Interco. Interco has instituted the following safeguards when advisory fees are deducted directly from a client's custodial account:

- We shall obtain written authorization from the client to deduct our advisory fees from their account(s) held with the qualified custodian;
- Each time a fee is deducted from the client's account(s) at the qualified custodian, we shall send the qualified custodian an invoice or statement of the amount of the fee to be deducted from the client's account; and
- We shall, concurrently with the invoice sent to the qualified custodian, send the client an invoice or statement itemizing the fee. Itemization includes the formula used to calculate the fee, the value of the assets under management on which the fee is based, and the time period covered by the fee.

Clients can access daily, monthly and annual account statements as well as daily trade confirmations through a password protected portion of Interactive Brokers' website, [www.interactivebrokers.com](http://www.interactivebrokers.com). Clients should also expect to receive quarterly account summaries from the qualified custodian by first-class mail. Clients should carefully review the account statements and summaries received from the qualified custodian(s) and compare such official custodial statements to any account reports provided by Intero. Any client that does not receive an account statement or summary from the qualified custodian should call our firm immediately so that we can arrange to have another statement sent by the custodian.

Clients can also access information concerning their account(s) and access (and generally change) the settings for their brokerage account online on the Interactive Brokers website at [www.interactivebrokers.com](http://www.interactivebrokers.com).

## Item 16 Investment Discretion

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### **DISCRETIONARY AUTHORITY**

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Intero manages client securities portfolios on a discretionary basis. Intero is granted limited discretionary authority in writing by the client at the outset of the advisory relationship. This limited discretionary authorization gives Intero the authority to manage the client's investment assets at our firm's sole discretion and without consulting with the client in advance, subject to the investment objectives, guidelines and restrictions set by the client. Specifically, Intero is granted the authority to purchase and sell securities and instruments in the Client's account(s), arrange for delivery and payment in connection with the purchase and sale of securities. Client will execute instructions regarding Advisor's trading authority as required by each Custodian. This authorization will remain in full force and effect until we receive a written termination notice of the Investment Management Agreement from the client.

Intero does not have discretionary authority to determine what broker-dealer to use or the amount of commissions that are charged by the broker-dealer or custodian.

## Item 17 Voting Client Securities

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### **AUTHORITY TO VOTE CLIENT PROXIES**

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Intero generally accepts authority from clients with respect to voting of proxies solicited by, or with respect to, the issuers of any securities held in client portfolios.

**Responsibility.** Tom Bonvissuto, as Chief Compliance Officer, has the responsibility for the implementation and monitoring of our proxy voting policy, practices, disclosures, and record keeping, including outlining our voting guidelines in our procedures.

**Procedures.** Absent material conflicts, Tom Bonvissuto, Managing Member and Chief Compliance Officer, will determine how Intero Financial Planning, LLC should vote the proxy in accordance with applicable voting guidelines, complete the proxy and vote the proxy in a timely and appropriate manner. When voting proxies on behalf of Clients Intero Financial Planning, LLC intends to:

- Vote Client proxies in a manner that is consistent with what we believe to be the best interests of its Clients;
- Base its decision to vote a Client proxy on information that is reasonably available to us;
- Determine how to vote proxies based on our reasonable judgment of the vote most likely to produce favorable financial results for you;
- Vote each and every proxy unless the responsible principal affirmatively determines to abstain from voting such proxy because abstention is in the best interest of its Clients;
- Disregard our own interests in voting a proxy if we determine that there is an actual conflict of interest between the Client and the firm, as adviser, with respect to a specific proxy issue;
- Maintain a Client proxy file to retain records and any related research conducted by Intero Financial Planning, LLC relating to the proxies voted by Intero Financial Planning, LLC, which file will contain, at minimum:
  - (1) the proxy materials distributed by the issuer of the security to which the proxy relates;
  - (2) a record of how Intero Financial Planning, LLC voted that proxy and;
  - (3) copies of supporting research.

**Voting Guidelines.** In the absence of specific voting guidelines from the client, Intero Financial Planning, LLC will vote proxies in the best interests of each particular client. Intero Financial Planning, LLC's policy is to vote all proxies from a specific issuer the same way for each client absent qualifying restrictions from a client. Clients are permitted to place reasonable restrictions on Intero Financial Planning, LLC 's voting authority in the same manner that they may place such restrictions on the actual selection of account securities during regularly schedule and/or requested meetings with an investment adviser representative of Intero.

As a general policy, Intero Financial Planning, LLC believes that the management of each of the invested companies makes proxy voting recommendations that are in the best interest for the company and its shareholders. Intero Financial Planning, LLC will therefore, as a matter of procedure, vote in a manner that is consistent with management recommendations except in certain specific situations where Intero Financial Planning, LLC determines management recommendation is not consistent with its client's interests. Any vote cast inconsistent with management recommendations will be specifically documented.

- Proxy votes generally will be cast in favor of proposals that: (1) maintain or strengthen the shared interests of shareholders and management; (2) increase shareholder value; (3) maintain or increase shareholder influence over the issuer's board of directors and management; (4) and maintain or increase the rights of shareholders.
- Generally, proxy votes will be cast against proposals having the opposite effect. However, we will consider both sides of each proxy issue. Unless we receive specific instructions from you, we will not base votes on social considerations.

**Client Requests for Information.** All client requests for information regarding proxy votes, or policies and procedures, received by any employee should be addressed by Tom Bonvissuto by writing or via email. In response to any request Tom Bonvissuto will prepare a written response to the client with the information requested, and as applicable will include the name of the issuer, the proposal voted upon, and how Intero Financial Planning, LLC voted the client's proxy with respect to each proposal about which client inquired.

**Conflicts of Interest.** Conflicts of interest between you and our firm, or a Managing Member of our firm, regarding certain proxy issues could arise. If we determine that a material conflict of interest exists, we will take the following necessary steps to resolve the conflict before voting the proxies.

- Intero Financial Planning, LLC will identify any conflicts that exist between the interests of the adviser and the client by reviewing the relationship of Intero Financial Planning, LLC with the issuer of each security to determine if Intero Financial Planning, LLC or any of its employees has any financial, business or personal relationship with the issuer.
- If a material conflict of interest exists, Tom Bonvissuto will determine whether it is appropriate to disclose the conflict to the affected clients, to give the clients an opportunity to vote the proxies themselves, or to address the voting issue through other objective means such as voting in a manner consistent with a predetermined voting policy or receiving an independent third-party voting recommendation.
- Intero Financial Planning, LLC will maintain a record of the voting resolution of any conflict of interest.

Clients who would like to obtain a copy of our firm’s proxy policies and procedures and/or a report summarizing how their securities were voted may contact our firm at 410-458-6098 or tom@interofp.com. Intero may utilize a third-party service provider to assist with the functions related to voting client proxies.

## Item 18 Financial Information

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### REQUIRED DISCLOSURES

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As previously discussed in this brochure, Intero may accept limited discretionary authority when providing investment management services if agreed upon in writing with the client. Intero does not require clients to prepay more than \$500 in fees six months or more in advance. Intero does not require or solicit prepayment of fees from our clients.

Intero has no financial commitments that would impair our firm’s ability to meet our contractual and fiduciary commitments to our clients and has not been the subject of a bankruptcy proceeding.

## Item 19 Requirements for State-Registered Advisers

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### EXECUTIVE OFFICERS AND MANAGEMENT PERSONS

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**Name:** Thomas Vincent Bonvissuto

**Year of Birth:** 1965

**Education:** Bachelor of Science (B.S.); 1987  
Carnegie Mellon University, PA

**Experience:** Managing Member  
Intero Financial Planning LLC  
May 2019 – Present

Chief Investment Officer and Financial Planner  
The Financial Consulate  
Sept. 2013 – Dec. 2018

Senior Institutional Portfolio Manager

Wilmington Trust Investment Advisors,  
Sept. 1995 – Sept. 2013

Senior Institutional Portfolio Manager  
M&T Bank,  
Dec. 1991 – Sept. 2013

**Chartered Financial Analyst (CFA).** The CFA charter is a globally respected, graduate-level investment credential established in 1962 and awarded by the CFA Institute — the largest global association of investment professionals. To earn the CFA charter, candidates must: 1) pass three sequential, six-hour examinations; 2) have at least four years of qualified professional investment experience; 3) join CFA Institute as members; and 4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct. The CFA Institute Code of Ethics and Standards of Professional Conduct, enforced through an active professional conduct program, require CFA charterholders to place their clients' interests ahead of their own; maintain independence and objectivity; act with integrity, maintain and improve their professional competence; and disclose conflicts of interest and legal matters. Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study per level). Earning the CFA charter demonstrates mastery of many of the advanced skills needed for investment analysis and decision making in today's quickly evolving global financial industry.

The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test a proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning. The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession.

**Certified Financial Planner (CFP®).** The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States. To attain the right to use the CFP® marks, an individual

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must satisfactorily fulfill the following requirements: (1) Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning; (2) Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances; (3) Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and (4) Agree to be bound by CFP Board's Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks: (1) Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and (2) Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

**ChFC® (Chartered Financial Consultant®).** The ChFC® designation has been a mark of excellence for financial planners for almost thirty years and currently requires more courses than any other financial planning credential. The curriculum covers extensive education and application training in all aspects of financial planning, income taxation, investments, and estate and retirement planning.

ChFC® candidates must complete nine college-level courses, seven required and two electives. The required courses include Financial Planning: Process and Environment; Fundamentals of Insurance Planning; Income Taxation; Planning for Retirement Needs; Investments; Fundamentals of Estate Planning; and Financial Planning Applications.

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## **OUTSIDE BUSINESS ACTIVITIES**

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Mr. Bonvissuto works as a driver for Uber and Lyft in Maryland and Pennsylvania for approximately 40 hours a week, outside of US trading hours.

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**PERFORMANCE-BASED FEES**

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Please refer to Item 6 (Performance-Based Fees and Side-By-Side Management) of this Brochure for more information. Intero does not charge our clients fees based on a share of capital gains on or capital appreciation of the assets in their account.

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**LEGAL OR DISCIPLINARY EVENTS**

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Neither Intero nor our management persons have been involved or been found liable in any arbitration claims alleging damages in excess of \$2,500 or been involved or been found liable in any civil, self-regulatory organization, or administration proceeding.

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**ISSUERS OF SECURITIES**

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Neither Intero nor our management persons have any relationships or arrangements with any issuers of securities.

## Form ADV Part 2B: Brochure Supplement

### **Intero Financial Planning, LLC**

**19025 York Rd  
Parkton, MD 21120**

**CRD No. 2656688**

This brochure supplement provides information about our supervised persons that supplements the Interio Financial Planning, LLC brochure. You should have received a copy of that brochure. If you did not receive Interio Financial Planning, LLC's brochure or if you have any questions about the contents of this supplement please contact our firm at 410-458-6098 or [tom@interofp.com](mailto:tom@interofp.com).

Additional information about the supervised persons mentioned in this brochure supplement is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Effective Date: March 24, 2020

**SUPERVISED PERSONS:** Thomas Vincent Bonvissuto

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## EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

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**Name:** Thomas Vincent Bonvissuto

**Year of Birth:** 1965

**Education:** Bachelor of Science (B.S.); 1987  
Carnegie Mellon University, PA

**Experience:** Managing Member  
Intero Financial Planning LLC  
May 2019 – Present

Chief Investment Officer and Financial Planner  
The Financial Consulate  
Sept. 2013 – Dec. 2018

Senior Institutional Portfolio Manager  
Wilmington Trust Investment Advisors,  
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Senior Institutional Portfolio Manager  
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mastery of many of the advanced skills needed for investment analysis and decision making in today's quickly evolving global financial industry.

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Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks: (1) Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and (2) Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP®

professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

**ChFC® (Chartered Financial Consultant®).** The ChFC® designation has been a mark of excellence for financial planners for almost thirty years and currently requires more courses than any other financial planning credential. The curriculum covers extensive education and application training in all aspects of financial planning, income taxation, investments, and estate and retirement planning.

ChFC® candidates must complete nine college-level courses, seven required and two electives. The required courses include Financial Planning: Process and Environment; Fundamentals of Insurance Planning; Income Taxation; Planning for Retirement Needs; Investments; Fundamentals of Estate Planning; and Financial Planning Applications.

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#### **DISCIPLINARY INFORMATION**

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Mr. Bonvissuto has not been involved in any legal or disciplinary events that would be material to a client's or prospective client's evaluation of the integrity of our management.

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#### **OTHER BUSINESS ACTIVITIES**

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Mr. Bonvissuto has been serving as a trustee for Sheppard Pratt Investment Inc. since June 2016. He spends one hour per month, outside of US trading hours, reviewing investments related to the organization with other trustees and investment consultants. As a trustee, Mr. Bonvissuto acts in an independent capacity from our advisory business.

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#### **ISSUERS OF SECURITIES**

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Mr. Bonvissuto, Managing Member of Intero, works as a part-time driver with UBER Technologies Inc. (UBER), a U.S. publicly traded company. Mr. Bonvissuto also works as a part-time driver with Lyft Inc. (LYFT), a U.S. publicly traded company.

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#### **ADDITIONAL COMPENSATION**

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Mr. Bonvissuto does not receive any additional compensation, apart from his or her regular salary and bonuses, that is based, all or in part, on the number or amount of sales, client referrals, or new accounts. Mr. Bonvissuto does not receive any economic benefit from anyone who is not a client for providing advisory services.

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**SUPERVISION**

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Mr. Bonvissuto is the sole principal and Chief Compliance Officer (“CCO”) of our firm and as such has no internal supervision placed over him. He is, however, bound by our firm’s Code of Ethics. Intero has adopted supervisory guidelines and a Code of Ethics designed to supervise its supervised persons and ensure compliance with the Maryland Securities Act. The CCO shall review the investment advice provided to the clients periodically and review supervisory guidelines annually or as necessary. The CCO may be contacted at 410-458-6098 or by email at tom@interofp.com.

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**REQUIREMENTS FOR STATE-REGISTERED ADVISERS**

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Mr. Bonvissuto has not been involved or been found liable in any arbitration claims alleging damages in excess of \$2,500, in any civil, self-regulatory organization, or administration proceeding, or been subject of any bankruptcy petition.