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Form ADV Part 2A Brochure

SIMA Wealth Partners, LLC is an investment adviser registered with the Virginia Division of Securities and Retail Franchising. An "investment adviser" means any person who, for compensation, engages in the business of advising others, either directly or through publications or writings, as to the value of securities or as to the advisability of investing in, purchasing, or selling securities, or who, for compensation and as part of a regular business, issues or promulgates analyses or reports concerning securities. Registration with the SEC or any state securities authority does not imply a certain level of skill or training.

This brochure provides information about the qualifications and business practices of SIMA Wealth Partners, LLC. If you have any questions about the contents of this brochure, please contact us at (804) 285-5700. 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 SIMA Wealth Partners, LLC is available on the SEC's website at www.adviserinfo.sec.gov. The firm's CRD number is 159943.

Material Changes - Item 2

The purpose of this page is to inform you of any material changes to this Brochure since our firm's last annual updating amendment.

On March 25, 2026, we submitted an updated amendment filing. Since then we have made the following material changes.

Item 1: Cover Page & Item 4: Advisory Business – We have moved our offices

We review and update our brochure at least annually to make sure that it remains current. If you would like to receive a complete copy of our Form ADV Part 2 Brochure, please contact us at the contact information on the cover page of this document.

Table of Contents - Item 3

Contents

Advisory Business - Item 4 4
Fees and Compensation - Item 5 7
Performance-Based Fees and Side-By-Side Management - Item 6 10
Types of Clients - Item 7 10
Methods of Analysis, Investment Strategies and Risk of Loss - Item 8 11
Disciplinary Information - Item 9 15
Other Financial Industry Activities or Affiliations - Item 10 15
Code of Ethics, Participation or Interest in Client Transactions and Personal Trading - Item 11 16
Brokerage Practices - Item 12 17
Review of Accounts - Item 13 19
Client Referrals and Other Compensation - Item 14 20
Custody - Item 15 20
Investment Discretion - Item 16 21
Voting Client Securities - Item 17 21
Financial Information - Item 18 21
Miscellaneous 22

Advisory Business - Item 4

SIMA Wealth Partners, LLC (hereinafter "SIMA Wealth") is a registered investment advisor with the Securities and Exchange Commission ("SEC") based in Richmond, Virginia. We are a limited liability company under the laws of the State of Virginia. We have been providing investment advisory services since 2012. Mark Allen Jones, CPA, AIF®, is the Managing Member and principal owner of SIMA Wealth. Jennifer Monahan Betz is a Member of SIMA Wealth.

Currently, we offer the following investment advisory services, personalized to each individual client:

- **Portfolio Management Services**
- **Financial Planning Services**
- **Selection of Third-Party Investment Advisers**

The following paragraphs describe our services and fees. Each investment advisory service is listed below and describes how we tailor our advisory services to your individual needs. Also, you may see the term Associated Person throughout this Brochure. As used in this Brochure, this term refers to anyone from SIMA Wealth who is an officer, employee, and all individuals providing investment advice on behalf of SIMA Wealth. Such persons are properly registered as investment adviser representatives in all required jurisdictions.

Portfolio Management Services/Wrap Program
Portfolio management refers to the management of money, including investments. Assets are usually held in what is called a portfolio. Determining the types and quantities of securities to hold in a portfolio is referred to as portfolio management.

SIMA Wealth is the portfolio manager and sponsor of a wrap fee program. Under SIMA Wealth's wrap program, the client generally receives portfolio management, investment advisory services, the execution of securities brokerage transactions, custody and reporting services for a single specified fee. SIMA Wealth, as portfolio manager, is responsible for the research, security selection, and implementation of transaction orders in the Client's account. Participation in a wrap program can cost the client more or less than purchasing such services separately. Conflict of Interest. SIMA Wealth shall receive as payment for its investment advisory services, the balance of the wrap fee after all other costs incorporated into the wrap fee have been deducted, though these fees are immaterial. Because wrap program transaction fees and/or commissions are being paid by SIMA Wealth to the account custodian/broker-dealer, Charles Schwab & Co., Inc. (Schwab), SIMA Wealth could have an economic incentive to maximize its compensation by seeking to minimize the number of transaction fee trades in the client's account. The terms and conditions of a wrap program engagement are more fully discussed in SIMA Wealth's Wrap Fee Program Brochure. SIMA Wealth's Chief Compliance Officer, Mark Jones, remains available to address any questions that a client or prospective client may have regarding a wrap fee arrangement and the corresponding conflict of interest. Please Note-Cash Positions: SIMA Wealth continues to treat cash as an asset class. As such, unless determined to the contrary by SIMA Wealth, all cash positions (money markets, etc.) shall continue to be included as part of assets under management for purposes of calculating SIMA Wealth's advisory fee. At any specific point in time, depending upon perceived or anticipated market conditions/events (there being no guarantee that such anticipated market conditions/events will occur), SIMA Wealth may maintain cash positions for defensive purposes. In addition, while assets are maintained in cash, such amounts could miss market advances. Depending upon current yields, at any point in time, SIMA Wealth's advisory fee could exceed the interest paid by the client's money market fund.

Wrap accounts are managed to diversify our clients' investments and may include various types of securities such as equity securities, corporate debt securities, certificates of deposit, exchange traded funds, mutual

funds, U.S. government securities and options in its portfolio management programs. In limited cases, we may also recommend investments in warrants, commercial paper, options, and limited partnerships investing in real estate, oil, and gas.

Our investment advice is tailored to meet our clients' needs and investment objectives. If you decide to hire SIMA Wealth to manage your portfolio, we will meet with you to gather your financial information, determine your goals, and decide how much risk you should take in your investments. However we construct your investment portfolio, we will monitor your portfolio's performance on a continuous basis, and rebalance the portfolio whenever necessary, as changes occur in market conditions, your financial circumstances, or both.

We recommend that you review the statement(s) you receive from the qualified custodian. Please call our main office number, located on the cover page of this brochure, if you have any questions about your statement.

Financial Planning Services
We offer broad based financial planning including tax planning, insurance planning, estate planning, disability planning, business planning, retirement planning, education planning, and budgeting and cash flow analysis. SIMA Wealth strives to achieve a client's long-term financial goals by implementing a financial planning process that may include any or all of the following steps:

- Assessment of a client's present financial situation by collecting information regarding net worth and cash flow statements, tax returns, insurance policies, investment portfolios, pension plans, employee benefit statements etc.
- Identification of a client's financial and personal goals and objectives. Goals or objectives may include financing a child's college education or retirement planning. The identified goals or objectives are specific, realistic, and measurable. All goals include time horizons.
- Resolution of finance related problems. Obstacles to achieving financial independence are identified so that resolution may occur. Examples of problem areas can include too little or too much insurance coverage, inadequate cash flow or a high tax burden.
- Plan Design. A written financial plan is prepared that includes recommendations and solutions to any financial related problems.
- Implementation of the financial plan. The financial plan is finalized and agreed upon. The recommendations and solutions are executed to reach the desired goals and objectives.
- Evaluation of the financial plan is conducted periodically. The financial planning service provides the option of conducting a periodic review and revision of the plan to ensure that the financial goals are achieved. The client may be required to pay an additional fee to exercise this option.

Financial plans are based on your financial situation and the financial information you provide to SIMA Wealth. If your financial situation, goals, objectives, or needs change, you must notify us promptly.

We also provide financial planning services that cover a specific area, such as retirement or estate planning. We offer consultative services where we set an appointment to meet with you for financial planning advice for an hourly fee.

You may choose to accept or reject our recommendations. If you decide to proceed with our recommendations, you may do so either through our investment advisory services or by using the advisory/brokerage firm of your choice.

Selection of Third-Party Investment Advisers
SIMA Wealth may enter into agreements with various third-party investment advisers for the provision of certain investment advisory services**.** Factors considered in the selection of a third-party advisor include but may not be limited to: i) SIMA Wealth's preference for a particular third-party advisor; ii) the client's risk

tolerance, goals and objectives, as well as investment experience; and, iii) the amount of client assets available for investment. In order to assist clients in the selection of a third-party advisor, an Associated Person of SIMA Wealth will typically gather information from the client about the client's financial situation, investment objectives, and reasonable restrictions the client wants imposed on the management of the account.

The third-party advisor may customize the client's portfolio by blending traditional investment strategies with an allocation to asset classes. The investment strategy adopted by the third-party advisor may embrace value, growth, or contrarian investing styles. Generally, securities transactions will be decided upon and executed by the third-party advisor on a discretionary basis. This means that the manager selected will have the ability to buy and sell securities in your account without obtaining your approval. SIMA Wealth and its Associated Persons will not manage or obtain discretionary authority over the assets in accounts participating in these programs; however, clients may grant SIMA Wealth the discretionary authority to hire and fire such third party managers. Generally, clients may not impose restrictions on investing in certain securities or types of securities in accounts managed by a third-party advisor.

Associated Persons of SIMA Wealth will periodically review reports provided to the client. An Associated Person of SIMA Wealth will contact the client at least annually, or more often as agreed upon with each client, to review the client's financial situation and objectives, communicate information to the third-party advisor managing the account as necessary, and to assist the client in understanding and evaluating the services provided by the third-party advisor. Clients will be expected to notify SIMA Wealth of any changes in their financial situation, investment objectives, or account restrictions.

The third-party advisor may offer wrapped or non-wrapped pricing options. Wrap pricing structures allow the client to pay an all-inclusive fee for management, brokerage, clearance, custody, and administrative services. In a non-wrap pricing structure, the third-party advisor's fee may be separated from the advisory fee charged by SIMA Wealth. Transaction costs may also be charged for the execution and clearance of advisory transactions directed by such Third-Party Advisory Services. A complete description of the programs and services provided, the amount of total fees, the payment structure, termination provisions and other aspects of each program are detailed and disclosed in: i) the third-party advisor's Form ADV Part 2A; ii) the program wrap brochure (if applicable) or other applicable disclosure documents; iii) the disclosure documents of the portfolio manager(s) selected; or, iv) the third-party advisor's account opening documents. A copy of all relevant disclosure documents of the third-party advisor and of the individual portfolio manager(s) will be provided to anyone interested in these programs/managers.

Direct Private Investments, Private Equity, Other Private Investment Vehicles
We offer investment advisory services that may include recommendations to invest in (i) direct investments in private companies and (ii) unaffiliated third-party private equity funds and other private investment vehicles. These investments are available only to clients who qualify as accredited investors (or who otherwise satisfy the applicable exemption under Regulation D of the Securities Act of 1933) and for whom we determine the investment is suitable based on their financial situation, investment objectives, risk tolerance, and liquidity needs.

For direct investments in private companies, we perform due diligence on the issuer and the transaction and recommend that the client subscribe directly with the company. The client enters into the subscription agreement directly with the issuer; we do not act as the issuer's agent or receive any transaction-based compensation.

For unaffiliated private equity funds, we identify, evaluate, and recommend specific funds that we believe are appropriate for a client's portfolio. The client invests directly in the fund by executing the fund's subscription documents. We have no affiliation with, and receive no compensation from, any of the private equity funds or private companies we recommend.

These private-market investments are generally illiquid and are intended as a small portion of a diversified portfolio. We do not manage or advise any private funds ourselves.

Assets Under Management
As of December 31, 2025, we have approximately $156,659,083 in discretionary assets under management. We do not manage assets on a non-discretionary basis.

Fees and Compensation - Item 5

SIMA Wealth generally charges a percentage of assets under management, hourly charges, and/or fixed fees for its advisory services.

Portfolio Management Services/Wrap Program Fees
In the SIMA Wrap Fee program, the client generally receives investment advisory services, the execution of securities brokerage transactions, custody and reporting services for a single specified fee. The advisory fee is negotiable between the client and the Advisor and is set out in the following fee schedule:

Assets Under Management	Annual Fee
First $1,000,000	1.25%
Next $2,000,000	0.85%
Next $2,000,000	0.65%
Over $5,000,000	0.40%

Participation in the Wrap Fee Program may cost more or less than purchasing such services separately. Also, the Program fee charged by SIMA Wealth for participation in the Program may be higher or lower than those charged by other sponsors of comparable wrap fee programs.

When managing a client's account on a wrap fee basis, SIMA Wealth shall receive as payment for its investment advisory services, the balance of the wrap fee after all other costs incorporated into the wrap fee have been deducted. Because wrap program transaction fees and/or commissions, though immaterial, are being paid by SIMA Wealth to the account custodian/broker-dealer, SIMA Wealth has an economic incentive to maximize its compensation by seeking to minimize the number of trades in the client's account. Under the Program, SIMA Wealth shall be provided with written authority to determine which securities and the amounts of securities that are bought or sold. Any limitations on this authority shall be included in the written agreement between each client and SIMA Wealth. Clients may change/amend these limitations, in writing, at any time. The client shall have reasonable access to one of SIMA Wealth's investment professionals to discuss their account.

Portfolio management fees may be negotiable depending on factors such as the amount of assets under management, range of investments, and complexity of the client's financial circumstances, among others. Since this fee is negotiable, the exact fee paid by the client will be clearly stated in the advisory agreement signed by the client and SIMA Wealth. Fees are billed quarterly, in advance, and are based on the amount of the assets under management on the last day of the prior quarter as valued by an independent pricing service, where available, or otherwise in good faith as reflected on Client's quarterly portfolio evaluation report.

Payment of our portfolio management fees will be made by the qualified custodian holding the client's funds and securities, provided the following requirements are met:

- We have authorization from you, in writing, permitting the fees to be paid directly from your account held by the qualified custodian.

- We disclose to you that it is your responsibility to verify the accuracy of the fee calculation and that the custodian will not determine whether the fee is accurately calculated.

- The qualified custodian agrees to send you a statement, at least quarterly, showing all funds that came out of your account including the amount of the advisory fee paid directly to SIMA Wealth.

We may deduct the fee from a designated account to facilitate billing.

You may see slight differences in the quarter-end market value of your account from your custodian's statement as compared to the billable market value of your account due to differences in the treatment of accrued interest posting, trade date versus settlement date, and other variables. You should review the information in the account statement provided by the custodian. The custodian's account statement is the official record of the holdings and value of investments held in your account(s).

At the inception of investment management services, the first pay period's fees will be calculated on a pro-rata basis. The Advisory Agreement between SIMA Wealth and the client will continue in effect until either party terminates the Agreement in accordance with the terms of the Agreement. SIMA Wealth's annual fee will be pro-rated through the date of termination, and any remaining balance shall be refunded to the client in a timely manner.

Financial Planning Services
SIMA Wealth may provide financial planning and consulting services for a fixed fee and/or hourly fee. The fee will be payable to SIMA Wealth. Our consulting fees are negotiable and are payable as invoiced. We utilize the following financial planning fee schedules:

- *Fixed Fees:* SIMA Wealth will charge a fixed fee that ranges from $3,500.00 to $15,000.00, for broad-based planning services. *In limited circumstances*, the total cost could potentially exceed $15,000.00. For example, a client with limited assets who hires SIMA Wealth for retirement planning may only pay a fee of $3,500 while a client with a complex financial situation who hires SIMA Wealth for a broad-based plan that includes a retirement plan, insurance review, tax Planning, estate Planning, cash flow planning and education goal planning may pay a fee of $15,000. *In limited circumstances*, the total cost could potentially exceed $15,000.00. In these cases, we will notify the client before the additional work is performed and we may request that the client pay an additional fee.

- *Hourly Fees:* SIMA Wealth charges an hourly fee of $325 for clients who request specific services (such as a modular plan or hourly consulting services) and do not desire a broad-based written financial plan.

If the client engages SIMA Wealth for additional investment advisory services, SIMA Wealth may offset all or a portion of its fees for those services based upon the amount paid for the consulting services.

Prior to engaging SIMA Wealth to provide consulting services, the client will generally be required to enter into a written Agreement with us. The Agreement will set forth the terms and conditions of the engagement and describe the scope of the services to be provided and the portion of the fee that is due from the client. Generally, SIMA Wealth requires a prepayment of 50% of the fee with the remaining balance due upon completion of the agreed-upon services. SIMA Wealth does not require the prepayment of over $1,200, six or more months in advance.

Either party may terminate the Agreement by written notice to the other. In the event the client terminates SIMA Wealth's consulting services, the balance of SIMA Wealth's unearned fees (if any) shall be refunded to the client.

Fees for Private Equity Investments
Our advisory fee is described in the client's Investment Advisory Agreement and is typically based on a percentage of assets under management (including the value of any private-market investments we recommend).

Important conflict of interest regarding private equity funds: When we recommend an unaffiliated private equity fund, the fund itself will charge its own management fee (typically 1.5%–2.0% of committed or invested capital) and carried interest (typically 20% of profits), in addition to our advisory fee. This creates a layered fee structure in which the client pays both the fund-level fees and our separate advisory fee on the same assets. We do not receive any portion of the fund's management fee or carried interest, nor do we receive any referral fees or other compensation from the funds. To mitigate this conflict, we consider the total expense ratio of the fund (including its 2-and-20 structure) when evaluating suitability, and we disclose the fund's fees in detail before the client invests. Clients are not required to accept any recommendation and may invest in the same fund through another adviser that does not charge an additional advisory fee.

No additional fees or commissions are charged for direct private-company investments beyond our standard advisory fee. The applicable schedule of AUM fees can be found under Item 5, A referenced above

Additional Fees and Expenses
The fees SIMA Wealth charges may be negotiable based on the amount of assets under management, complexity of client goals and objectives, and level of services rendered. As described above, the fees are charged as described and are not based on a share of capital gains of the funds of an advisory client.

All fees paid to SIMA Wealth for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds or exchange traded funds to their shareholders. These fees and expenses are described in each fund's prospectus. These fees generally include a management fee, other fund expenses, and a possible distribution fee. If the fund also imposes sales charges, a client may pay an initial or deferred sales charge.

A client could invest in a mutual fund directly, without the services of SIMA Wealth. In that case, the client would not receive the services provided by SIMA Wealth, which are designed, among other things, to assist the client in determining which mutual fund or funds are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the funds and the fees charged by SIMA Wealth to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

At our discretion, we may combine the account values of family members to determine the applicable advisory fee. For example, we may combine account values for you, your spouse, joint accounts with your spouse, your minor children, and other types of related accounts. Combining account values will increase the calculated asset total, which may result in your paying a reduced advisory fee based on the available breakpoints in our fee schedule stated above. SIMA may, in its sole discretion, change the actual fee charged upon thirty days written notice to the client. Clients may accept the change or close the account.

We have instituted procedures to evaluate investment costs and will always attempt to find the lowest cost option. On occasion, we may invest in issues that are not the lowest cost for our clients.

Billing on Cash Positions: The firm treats cash and cash equivalents as an asset class. Accordingly, unless otherwise agreed in writing, all cash and cash equivalent positions (e.g., money market funds, etc.) are included as part of assets under management for purposes of calculating the firm's advisory fee. At any specific point in time, depending upon perceived or anticipated market conditions/events (there being no guarantee that such anticipated market conditions/events will occur), the firm may maintain cash and/or cash equivalent positions for defensive, liquidity, or other purposes. While assets are maintained in cash or cash equivalents, such amounts could miss market advances and, depending upon current yields, at any point in time, the firm's advisory fee could exceed the interest paid by the client's cash or cash equivalent positions.

Periods of Portfolio Inactivity: The firm has a fiduciary duty to provide services consistent with the client's best interest. As part of its investment advisory services, the firm will review client portfolios on an ongoing basis to determine if any changes are necessary based upon various factors, including but not limited to investment performance, fund manager tenure, style drift, account additions/withdrawals, the client's financial circumstances, and changes in the client's investment objectives. Based upon these and other factors, there may be extended periods of time when the firm determines that changes to a client's portfolio are neither necessary nor prudent. Notwithstanding, unless otherwise agreed in writing, the firm's annual investment advisory fee will continue to apply during these periods, and there can be no assurance that investment decisions made by the firm will be profitable or equal any specific performance level(s).

Compensation for the Sale of Securities or Other Investment Products
Mark Allen Jones, Managing Member of SIMA Wealth, is the President and sole shareholder of SIMA Financial Group, Inc., a financial services company. Associated persons of SIMA Wealth market their advisory services thorough this entity.

Persons associated with SIMA Wealth may also be associated with SIMA Retirement Solutions, LLC ("SIMA Retirement"), a Virginia based, registered investment adviser. We are affiliated through common control and ownership with SIMA Retirement. We may recommend that plan sponsors utilize retirement plan consulting services offered by SIMA Retirement. SIMA Wealth will not directly share in the compensation received by SIMA Retirement, but individuals associated with SIMA Wealth who are also associated with SIMA Retirement may be compensated in their capacities as owners, officers, and/or investment adviser representatives of SIMA Retirement. Associated Persons and we may have a financial incentive to recommend the services of SIMA Retirement. However, you are not required to use the services of SIMA Retirement.

All conflicts of interest between you and SIMA Wealth, and the Associated Persons of SIMA Wealth, are outlined in this Disclosure Brochure. If additional conflicts arise in the future, we will notify you in writing or supply you with an updated Disclosure Brochure.

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

We and our Associated Persons do not accept performance-based fees. Performance based fees are based on a share of capital gains on or capital appreciation of the client's assets.

Types of Clients - Item 7

We generally offer investment advisory services to individuals, pension and profit-sharing plans and participants, trusts, estates, charitable organizations, corporations, and other business entities.

SIMA Wealth requires a minimum of $500,000 to open and maintain an advisory account. At our sole discretion, we may waive this requirement. This requirement can be met by combining two or more accounts owned by you or related family members. Accounts managed by TPAs may be subject to different minimum investment requirements.

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

The following are different methods of analysis that we may use when providing you with investment advice:

- Fundamental Analysis – this approach attempts to determine a security's value by focusing on underlying factors that affect a company's actual business and its future prospects. The term refers to the analysis of the economic well-being of a financial entity as opposed to only its price movements.
- Tactical Analysis – this approach aims to take advantage of inefficiencies in asset pricing while avoiding overpriced assets. Tactical Analysts believe that making periodic changes in the amounts invested within different asset classes can enhance investment returns and reduce risk.

We may use one or more of the following investment strategies when advising you on investments:

- Long Term Purchases – securities held for over a year.
- Short Term Purchases – securities held for less than a year.
- Trading – securities held for less than 30 days.
- Covered Options – covered option is a strategy in which an investor writes an option contract while at the same time owning an equivalent number of shares of the underlying stock.

The investment advice provided along with the strategies suggested by SIMA Wealth will vary depending on each client's specific financial situation and goals. This brief statement does not disclose all of the risks and other significant aspects of investing in financial markets. In light of the risks, you should fully understand the nature of the contractual relationship(s) into which you are entering and the extent of your exposure to risk. Certain investing strategies may not be suitable for many members of the public. You should carefully consider whether the strategies employed would be appropriate for you in light of your experience, objectives, financial resources and other relevant circumstances.

Private-Market Investments (Direct Private Companies and Private Equity Funds)
Methods of Analysis and Due Diligence: Before recommending any direct investment in a private company or an unaffiliated private equity fund, we conduct a rigorous due-diligence process that includes: review of offering documents, financial statements, and track record; analysis of the manager's or sponsor's background, strategy, and alignment of interests; assessment of liquidity, valuation methodology, and fee structure; reference checks; and evaluation of how the investment fits within the client's overall asset allocation and risk profile. We rely on information provided by the issuer or fund manager, which is not independently verified by us in all cases.

Investing in securities involves risk of loss that you should be prepared to bear.

General Investment Risk: All investments come with the risk of losing money. Investing involves substantial risks, including complete possible loss of principal plus other losses and may not be suitable for many members of the public. Investments, unlike savings and checking accounts at a bank, are not insured by the government

to protect against market losses. Different market instruments carry different types and degrees of risk and you should familiarize yourself with the risks involved in the particular market instruments in which you intend to invest.

Loss of Value: There can be no assurance that a specific investment will achieve its investment objectives and past performance should not be seen as a guide to future returns. The value of investments and the income derived may fall as well as rise and investors may not recoup the original amount invested. Investments may also be affected by any changes in exchange control regulation, tax laws, withholding taxes, international, political and economic developments, and government, economic or monetary policies.

Interest Rate Risk: Fixed income securities and funds that invest in bonds and other fixed income securities may fall in value if interest rates change. Generally, the prices of debt securities rise when interest rates fall, and their prices fall when interest rates rise. Longer-term debt securities are usually more sensitive to interest rate changes.

Credit Risk: Investments in bonds and other fixed income securities are subject to the risk that the issuer(s) may not make required interest payments. An issuer suffering an adverse change in its financial condition could lower the credit quality of a security, leading to greater price volatility of the security. A lowering of the credit rating of a security may also offset the security's liquidity, making it more difficult to sell. Funds investing in lower quality debt securities are more susceptible to these problems and their value may be more volatile.

Foreign Exchange Risk: Foreign investments may be affected favorably or unfavorably by exchange control regulations or changes in the exchange rates. Changes in currency exchange rates may influence the share value, the dividends or interest earned and the gains and losses realized. Exchange rates between currencies are determined by supply and demand in the currency exchange markets, the international balance of payments, governmental intervention, speculation, and other economic and political conditions. If the currency in which a security is denominated appreciates against the US Dollar, the value of the security will increase. Conversely, a decline in the exchange rate of the currency would adversely affect the value of the security.

Risks Associated with Investing in Options: Transactions in options carry a high degree of risk. A relatively small market movement will have a proportionately larger impact, which may work for or against the investor. The placing of certain orders, which are intended to limit losses to certain amounts, may not be effective because market conditions may make it impossible to execute such orders. Selling ("writing" or "granting") an option generally entails considerably greater risk than purchasing options. Although the premium received by the seller is fixed, the seller may sustain a loss well in excess of that amount. The seller will also be exposed to the risk of the purchaser exercising the option and the seller will be obliged either to settle the option in cash or to acquire or deliver the underlying investment. If the option is "covered" by the seller holding a corresponding position in the underlying investment or a future on another option, the risk may be reduced.

Concentrated Position Risk: Certain Associated Persons may recommend that clients concentrate account assets in an industry or economic sector. In addition to the potential concentration of accounts in one or more sectors, certain accounts may, or may be advised to, hold concentrated positions in specific securities. Therefore, at times, an account may, or may be advised to, hold a relatively small number of securities positions, each representing a relatively large portion of assets in the account. As a result, the account will be subject to greater volatility than a more sector diversified portfolio. Investments in issuers within an industry or economic sector that experiences adverse economic, business, political conditions or other concerns will impact the value of such a portfolio more than if the portfolio's investments were not so concentrated. A change in the value of a single investment within the portfolio will affect the overall value of the portfolio and will cause greater losses than it would in a portfolio that holds more diversified investments.

Private-Market Investments (Direct Private Companies and Private Equity Funds)

Material Risks: Investments in private companies and private equity funds involve significant risks, including but not limited to:

- Illiquidity: There is generally no public market, and it may be impossible to sell or redeem the investment on short notice or at a fair price.
- Valuation uncertainty: Fair value is determined by the issuer or fund manager using subjective methodologies and may not reflect the price at which the investment could actually be sold.
- Loss of principal: These investments can result in a complete loss of capital.
- Limited transparency and regulation: Private funds and companies are not registered under the Investment Company Act and are subject to fewer regulatory requirements and disclosures than public securities.
- Manager risk: Performance depends heavily on the skill and integrity of the fund manager or company management.
- Tax and regulatory risks: Complex tax consequences and potential changes in law may affect returns.
- Layered fees (for PE funds): As described in Item 5, the client bears both fund-level fees and our advisory fee.

Because of these risks, we generally recommend that private-market investments represent only a modest percentage of a client's overall portfolio. Past performance of any fund or company is not indicative of future results. Clients should consult their own tax, legal, and financial advisors before investing.

Preferred Securities Risk: Preferred Securities have similar characteristics to bonds in that preferred securities are designed to make fixed payments based on a percentage of their par value and are senior to common stock. Like bonds, the market value of preferred securities is sensitive to changes in interest rates as well as changes in issuer credit quality. Preferred securities, however, are junior to bonds with regard to the distribution of corporate earnings and liquidation in the event of bankruptcy. Preferred securities that are in the form of preferred stock also differ from bonds in that dividends on preferred stock must be declared by the issuer's board of directors, whereas interest payments on bonds generally do not require action by the issuer's board of directors, and bondholders generally have protections that preferred stockholders do not have, such as indentures that are designed to guarantee payments – subject to the credit quality of the issuer – with terms and conditions for the benefit of bondholders. In contrast preferred stocks generally pay dividends, not interest payments, which can be deferred or stopped in the event of credit stress without triggering bankruptcy or default. Another difference is that preferred dividends are paid from the issue's after-tax profits, while bond interest is paid before taxes.

Inverse Funds: Inverse mutual funds and ETFs, which are sometimes referred to as "short" funds, seek to provide the opposite of the single-day performance of the index or benchmark they track. Inverse funds are often marketed as a way to profit from, or hedge exposure to, downward moving markets. Some inverse funds also use leverage, such that they seek to achieve a return that is a multiple of the opposite performance of the underlying index or benchmark (i.e., -200%, -300%). In addition to leverage, these funds may also use derivative instruments to accomplish their objectives. As such, inverse funds are highly volatile and provide the potential for significant losses.

Cybersecurity Risks: Our firm and our service providers are subject to risks associated with a breach in cybersecurity. Cybersecurity is a generic term used to describe the technology, processes, and practices designed to protect networks, systems, computers, programs, and data from cyber-attacks and hacking by other computer users, and to avoid the resulting damage and disruption of hardware and software systems, loss or corruption of data, and/or misappropriation of confidential information. In general, cyber-attacks are deliberate; however, unintentional events may have similar effects. Cyber-attacks may cause losses to clients by interfering with the processing of transactions, affecting the ability to calculate net asset value or impeding or sabotaging trading. Clients may also incur substantial costs as the result of a cybersecurity breach, including those associated with forensic analysis of the origin and scope of the breach, increased and upgraded cybersecurity, identity theft,

unauthorized use of proprietary information, litigation, and the dissemination of confidential and proprietary information. Any such breach could expose our firm to civil liability as well as regulatory inquiry and/or action. In addition, clients could be exposed to additional losses as a result of unauthorized use of their personal information. While our firm has established a business continuity plan and systems designed to prevent cyber-attacks, there are inherent limitations in such plans and systems, including the possibility that certain risks have not been identified. Similar types of cyber security risks are also present for issuers of securities, investment companies and other investment advisers in which we invest, which could result in material adverse consequences for such entities and may cause a client's investment in such entities to lose value.

Pandemic Risk: Large-scale outbreaks of infectious disease can greatly increase morbidity and mortality over a wide geographic area, crossing international boundaries, and causing significant economic, social, and political disruption. It is difficult to predict the long-term impact of such events because they are dependent on a variety of factors including the global response of regulators and governments to address and mitigate the worldwide effects of such events. Workforce reductions, travel restrictions, governmental responses and policies and macroeconomic factors will negatively impact investment returns.

Cryptocurrency Risk: Cryptocurrency (e.g., bitcoin and ether), often referred to as "virtual currency", "digital currency," or "digital assets," is designed to act as a medium of exchange. Cryptocurrency is an emerging asset class. There are thousands of cryptocurrencies, the most well-known of which is bitcoin. Certain of the firm's clients may have exposure to bitcoin or another cryptocurrency, directly or indirectly through an investment such as an ETF or other investment vehicles. Cryptocurrency operates without central authority or banks and is not backed by any government. Cryptocurrencies may experience very high volatility and related investment vehicles may be affected by such volatility. As a result of holding cryptocurrency, certain of the firm's clients may also trade at a significant premium or discount to NAV. Cryptocurrency is also not legal tender. Federal, state or foreign governments may restrict the use and exchange of cryptocurrency, and regulation in the U.S. is still developing. The market price of many cryptocurrencies, including bitcoin, has been subject to extreme fluctuations. If cryptocurrency markets continue to be subject to sharp fluctuations, investors may experience losses if the value of the client's investments decline. Similar to fiat currencies (i.e., a currency that is backed by a central bank or a national, supra-national or quasi-national organization), cryptocurrencies are susceptible to theft, loss and destruction. Cryptocurrency exchanges and other trading venues on which cryptocurrencies trade are relatively new and, in most cases, largely unregulated and may therefore be more exposed to fraud and failure than established, regulated exchanges for securities, derivatives and other currencies. The SEC has issued a public report stating U.S. federal securities laws require treating some digital assets as securities.

Cryptocurrency exchanges may stop operating or permanently shut down due to fraud, technical glitches, hackers or malware. Due to relatively recent launches, most cryptocurrencies have a limited trading history, making it difficult for investors to evaluate investments. Generally, cryptocurrency transactions are irreversible such that an improper transfer can only be undone by the receiver of the cryptocurrency agreeing to return the cryptocurrency to the original sender. Digital assets are highly dependent on their developers and there is no guarantee that development will continue or that developers will not abandon a project with little or no notice. Third parties may assert intellectual property claims relating to the holding and transfer of digital assets, including cryptocurrencies, and their source code. Any threatened action that reduces confidence in a network's long-term ability to hold and transfer cryptocurrency may affect investments in cryptocurrencies.

Many significant aspects of the U.S. federal income tax treatment of investments in cryptocurrency are uncertain and an investment in cryptocurrency may produce income that is not treated as qualifying income for purposes of the income test applicable to regulated investment companies. Certain cryptocurrency investments may be treated as a grantor trust for U.S. federal income tax purposes, and an investment by the firm's clients in such a vehicle will generally be treated as a direct investment in cryptocurrency for tax purposes and "flow-through" to the underlying investors.

Disciplinary Information - Item 9

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of us or the integrity of our management. There is no history of material legal or disciplinary events by SIMA Wealth or our management persons.

Other Financial Industry Activities or Affiliations - Item 10

Mark Allen Jones, Managing Member of SIMA Wealth, is the President and sole shareholder of SIMA Financial Group, Inc., a financial services company. Associated persons of SIMA Wealth market their advisory services thorough this entity.

Certain associates of the firm are also insurance agents licensed to sell insurance products. A conflict of interest exists in that these services pay a commission, which conflicts with the IAR's fiduciary duties. {{case|977071}} does not require its IARs to encourage clients to implement investment advice through our insurance product recommendations. Clients have the right to implement insurance product recommendations through the insurance agency and agent of their choice. We require that all IARs disclose this conflict of interest when such recommendations are made. We also require IARs to disclose that the client has the right to purchase recommended products from individuals not affiliated with us.

SIMA Financial Group, Inc. is also the holding company of SIMA Payroll Solutions, LLC. SIMA Payroll Solutions, LLC offers payroll processing services to its clients.

In addition, SIMA Financial Group, Inc. is the holding company for SIMA Technology Group, LLC. SIMA Technology Group, LLC offers technology managed services such as IT consulting, computer networking, backup & recovery systems to its clients.

Mr. Jones is the Managing Member and majority owner of SIMA Accounting Group, LLC, a full service certified public accounting firm providing a wide range of accounting services to individuals and business clients. Certain Associated Persons of SIMA Wealth may also offer accounting services through SIMA Accounting Group, LLC. Associated Persons of SIMA Wealth may recommend SIMA Accounting Group, LLC to their clients. As such, clients should be aware that a conflict of interest is inherent in such an arrangement. However, clients of one firm are not required to use the services of any affiliated firm.

Mr. Jones currently devotes approximately 65% of his time to SIMA Accounting Group, SIMA Payroll Solutions, and SIMA Technology Group.

Ms. Betz devotes approximately 10% of her time to SIMA Accounting Group; 40% to SIMA Retirement Solutions and 50% to SIMA Wealth Partners.

Persons associated with SIMA Wealth may also be associated with SIMA Retirement Solutions, LLC ("SIMA Retirement"), a Virginia based, registered investment adviser. We are affiliated through common control and ownership with SIMA Retirement. We may recommend that plan sponsors utilize retirement plan consulting services offered by SIMA Retirement. SIMA Wealth will not directly share in the compensation received by SIMA Retirement, but individuals associated with SIMA Wealth who are also associated with SIMA Retirement may be compensated in their capacities as owners, officers, and/or investment adviser representatives of SIMA

Retirement. Associated Persons and we may have a financial incentive to recommend the services of SIMA Retirement. However, you are not required to use the services of SIMA Retirement.

Mr. Jones currently devotes approximately 10% of his time as the Managing Member, Chief Compliance Officer, and as an Investment Adviser Representative of SIMA Retirement.

Associated Persons and we have a financial incentive to recommend the services of one or more of our affiliates. This creates a material conflict of interest. However, you are not required to purchase products through or to use the services of any of our affiliates or associated persons.

Recommendation of Other Advisors
We may recommend that you use a third-party advisor (TPA) as part of our asset allocation and investment strategy. You are not required to use the services of any TPA we recommend.

We will only recommend TPAs with whom we have executed a written agreement and we will provide all clients with a written disclosure that includes SIMA Wealth name, the TPA's name, the nature of the relationship, including any affiliation between SIMA Wealth and the TPA (if any); and the terms of such compensation arrangement.

We have no affiliations with, and receive no compensation from, any of the private equity funds, private companies, or their sponsors or managers that we recommend to clients. Recommendation of private equity investments will be to certain accredited investors.

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

Description of Our Code of Ethics
SIMA Wealth has adopted a Code of Ethics (the "Code") to address investment advisory conduct. The Code focuses primarily on fiduciary duty, personal securities transactions, insider trading, gifts, and conflicts of interest. The Code includes SIMA Wealth's policies and procedures developed to protect client's interests in relation to the following topics:

- The duty at all times to place the interests of clients first;
- The requirement that all personal securities transactions be conducted in such a manner as to be consistent with the code of ethics.
- The responsibility to avoid any actual or potential conflict of interest or misuse of an employee's position of trust and responsibility;
- The fiduciary principle that information concerning the identity of security holdings and financial circumstances of clients is confidential; and
- The principle that independence in the investment decision-making process is paramount.

A copy of SIMA Wealth's Code of Ethics is available upon request to Mark Allen Jones, Managing Member and Jennifer Monahan Betz, Member, at (804) 285-5700.

Personal Trading Practices
At times, SIMA Wealth and/or its Advisory Representatives may take positions in the same securities as clients, which may pose a conflict of interest with clients. SIMA Wealth and its Advisory Representatives will generally

be "last in" and "last out" for the trading day when trading occurs in close proximity to client trades. We will not violate our fiduciary responsibilities to our clients. Front running (trading shortly ahead of clients) is prohibited. Should a conflict occur because of materiality (i.e. a thinly traded stock), disclosure will be made to the client(s) at the time of trading. Incidental trading not deemed to be a conflict (i.e. a purchase or sale which is minimal in relation to the total outstanding value, and as such would have negligible effect on the market price), would not be disclosed at the time of trading.

Brokerage Practices - Item 12

SIMA Wealth does not maintain custody of your assets that we manage (although we may be deemed to have custody of your assets if you give us authority to withdraw assets from your account (see Item 15 custody, below). Your assets must be maintained in an account at a "qualified custodian," generally a broker-dealer or bank. We require that our clients use Charles Schwab & Co., Inc. (Schwab), a FINRA-registered broker-dealer, member SIPC, as the qualified custodian. We are independently owned and operated and not affiliated with Schwab. Schwab will hold your assets in a brokerage account and buy and sell securities when we instruct them to. While we require that you use Schwab as custodian/broker, you will decide whether to do so and open your account with Schwab by entering into an account agreement directly with them. We do not open the account for you. If you do not wish to place your assets with Schwab, we will not be able to manage your account. Not all advisors require their clients to use a particular broker-dealer or other custodian selected by the advisor. Even though your account is maintained at Schwab, we can still use other brokers to execute trades for your account, as described in the next paragraph.

How We Select Brokers/Custodians
We seek to select a custodian/broker who will hold your assets and execute transactions on terms that are overall most advantageous when compared to other available providers and their services. We consider a wide range of factors, including, among others, these:

- combination of transaction execution services along with asset custody services (generally without a separate fee for custody)
- capability to execute, clear and settle trades (buy and sell securities for your account)
- capabilities to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
- breadth of investment products made available (stocks, bonds, mutual funds, exchange traded funds (ETFs), etc.)
- availability of investment research and tools that assist us in making investment decisions
- quality of services
- competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate them
- reputation, financial strength and stability of the provider
- their prior service to us and our other clients
- availability of other products and services that benefit us, as discussed below (see "Products and Services Available to Us from Schwab")

Products and Services Available to Us from Schwab
Schwab Advisor Services is Schwab's business serving independent investment advisory firms like us. They provide us and our clients with access to its institutional brokerage – trading, custody, reporting and related

services – many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer our clients' accounts while others help us manage and grow our business. Schwab's support services are generally available on an unsolicited basis (we do not have to request them) and at no charge to us as long as we keep a total of at least $10 million of our clients' assets in accounts at Schwab. If we have less than $10 million in client assets at Schwab, it may charge us quarterly service fees. Below is a more detailed description of Schwab's support services:

Services that Benefit You

Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Schwab's services described in this paragraph generally benefit you and your account.

Additionally, Schwab has agreed to reimburse all transfer of Account Exit Fees to clients transferring into Schwab for a period of 12 months following the establishment of our custodial relationship with Schwab.

Services that May Not Directly Benefit You

Schwab also makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts. They include investment research, both Schwab's own and that of third parties. We may use this research to service all or some substantial number of our clients' accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:

- provide access to client account data (such as duplicate trade confirmations and account statements);
- facilitate trade execution and allocate aggregated trade orders for multiple client accounts;
- provide pricing and other market data;
- facilitate payment of our fees from our clients' accounts; and
- assist with back-office functions, recordkeeping, and client reporting.

Services that Generally Benefit Only Us

Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:

- educational conferences and events
- technology, compliance, legal, and business consulting;
- publications and conferences on practice management and business succession; and
- access to employee benefits providers, human capital consultants, and insurance providers.

Schwab may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab may also discount or waive its fees for some of these services or pay all or a part of a third party's fees. To this end, Schwab has agreed to provide SIMA Wealth a financial benefit for software purchases in the amount of $10,000 in year one, and $5,000 in year two, following the establishment of our custodial relationship with Schwab. Schwab may also provide us with other benefits such as occasional business entertainment of our personnel.

Our Interest in Schwab's Services

The availability of these services from Schwab benefits us because we do not have to produce or purchase them. We do not have to pay for Schwab's services so long as we keep a total of at least $10 million of client assets in accounts at Schwab. The $10 million minimum may give us an incentive to require that you maintain your account with Schwab based on our interest in receiving Schwab's services that benefit our business rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a potential conflict of interest. We believe, however, that our selection of Schwab as

custodian and broker is in the best interests of our clients. It is primarily supported by the scope, quality and price of Schwab's services (based on the factors discussed above – *see "How We Select Brokers/Custodians [to Recommend]")* and not Schwab's services that benefit only us. We do not believe that maintaining at least $10 million of assets under management at Schwab in order to avoid paying Schwab quarterly service fees presents a material conflict of interest.

Brokerage for Client Referrals
We do not receive client referrals from broker-dealers and custodians in which we have an institutional advisory arrangement. Also, we do not receive other benefits from a broker-dealer in exchange for client referrals.

Directed Brokerage
We routinely recommend that you direct SIMA Wealth to execute transactions through Schwab. As such, we may be unable to achieve the most favorable execution of your transactions and you may pay higher brokerage commissions than you might otherwise pay through another broker-dealer that offers the same types of services.

Clients participating in our Wrap Program will be required to execute transactions with Schwab. Not all investment advisers require clients to direct transactions to a single broker dealer or custodian, however, due to the nature of portfolio management services offered to our clients, we reserve the right to reject a new account if the client is unwilling or unable to open an account with Schwab.

In limited circumstances, and at our discretion, some clients may instruct SIMA Wealth to use one or more particular brokers for the transactions in their accounts. If you choose to direct SIMA Wealth to use a particular broker, you should understand that this might prevent SIMA Wealth from aggregating trades with other client accounts or from effectively negotiating brokerage commissions on your behalf. This practice may also prevent SIMA Wealth from obtaining favorable net price and execution. Thus, when directing brokerage business, you should consider whether the commission expenses, execution, clearance, and settlement capabilities that you will obtain through your broker are adequately favorable in comparison to those that we would otherwise obtain for you.

Trade Aggregation
SIMA Wealth may aggregate transactions in equity and fixed income securities for a client with other clients to improve the quality of execution. When transactions are so aggregated, the actual prices applicable to the aggregated transactions will be averaged, and the client account will be deemed to have purchased or sold its proportionate share of the securities involved at the average price obtained. SIMA Wealth may determine not to aggregate transactions, for example, based on the size of the trades, the number of client accounts, the timing of the trades and the liquidity of the securities. If SIMA Wealth does not aggregate orders, some clients purchasing securities around the same time may receive a less favorable price than other clients may receive. This means that this practice of not aggregating may cost clients more money. SIMA Wealth and/or its Associated Persons may participate in block trades with clients, and may also participate on a pro rata basis for partial fills, but only after the determination has been made that clients will receive fair and equitable treatment.

Review of Accounts - Item 13

Portfolio Management Account Reviews

The designated Investment Adviser Representative assigned to your account(s) will monitor client accounts on a continuous basis and conducts account reviews at least annually. Accounts participating in the Charles Schwab Institutional Intelligent Portfolios are automatically rebalanced on a periodic basis.

Additional reviews may be offered in certain circumstances. Triggering factors that may stimulate additional reviews include, but are not limited to, changes in economic conditions, changes in the client's financial situation or investment objectives, or a client's request. A financial plan is a snapshot in time and no ongoing reviews are conducted. We recommend clients engage us on an annual basis to update the financial plan.

For private-market investments that are not publicly traded, we rely on the valuations provided by the issuer or fund manager (typically quarterly or annually) when calculating our advisory fee. We do not independently verify these valuations but will discuss any material concerns with the client. Clients should understand that the value used for fee billing may differ from the amount the client could actually realize if the investment were sold.

Clients will receive statements directly from their account custodian(s) on at least a quarterly basis. Additionally, clients will receive a performance report as part of their annual account review.

Client Referrals and Other Compensation - Item 14

We and our related persons do not compensate, either directly or indirectly, any person or entity who is not our supervised person for client referrals.

Custodian Compensation
As described in Item 12 above, we receive economic benefits from our custodial broker dealer in the form of support products and services they make available to us and other independent investment advisors whose clients maintain their accounts at these custodial broker dealers. The availability of custodial products and services is not dependent upon or based on the specific investment advice we provide our clients, such as buying or selling specific securities or specific types of securities for our clients. The products and services provided by the custodial broker dealer, how they benefit us, and the related conflicts of interest are described above (see Item 12 – Brokerage Practices).

Custody - Item 15

SIMA Wealth is deemed to have "limited" custody of client funds because of the fee deduction authority granted by the client in the Advisory Agreement.

With respect to third party standing letters of authorization ("SLOA") where a client grants us authority to direct custodians to disburse funds to one or more third party accounts, we are deemed to have custody pursuant to Rule 206(4)-2 (the "Custody Rule"). We have taken steps to have controls and oversight in place to comply with the no-action letter issued by the SEC on February 21, 2017 (the "SEC no-action letter"). We are not required to comply with the surprise examination requirements of the Custody Rule if we comply with the representations noted in the SEC no-action letter. Where our firm acts pursuant to a SLOA, we believe we are making a good faith effort to comply with the representations noted in the SEC no-action letter. Additionally, since many of the representations noted in the SEC no-action letter involve the qualified custodian's operations, we will collaborate with our custodian(s) to ensure that the representations are met.

Additionally, related persons of SIMA Wealth may serve as trustees to certain accounts for which we provide investment advisory services. This capacity gives SIMA Wealth custody over the advisory accounts for which our related persons serve as trustees. These trustee capacities are in direct relation to a family or personal relationship that meets the criteria in the SEC's Final Rule on Custody (see FN #139) and thus, these assets are not subject to the annual custody exam.

Clients will receive account statements at least quarterly from the broker-dealer or other qualified custodian. It is the client's responsibility to review custodial account statements for accuracy. If you have a question regarding your account statement or if you did not receive a statement from your custodian, please contact Mark A. Jones, Managing Member at (804) 285-5700.

Investment Discretion - Item 16

SIMA Wealth offers Portfolio Management Services on a discretionary basis. Clients must grant discretionary authority in the client Advisory Agreement. Discretionary authority extends to the type and number of securities to be bought and sold and do not require advance client approval. However, SIMA Wealth does not have the ability to withdraw funds or securities from the client's account.

If you wish, you may limit our discretionary authority by, for example, setting a limit on the type of securities that can be purchased for your account. Simply provide us with your restrictions or guidelines in writing. Please refer to the "Advisory Business" section in this Brochure for more information on our discretionary management services.

Voting Client Securities - Item 17

Proxy Voting
SIMA Wealth does not vote proxies. It is the client's responsibility to vote proxies. Clients will receive proxy materials directly from the custodian. Questions about proxies may be made via the contact information on the cover page.

Financial Information - Item 18

We are required in this Item to provide you with certain financial information or disclosures about SIMA Wealth's financial condition. SIMA Wealth does not require the prepayment of over $1,200, six or more months in advance. Additionally, SIMA Wealth has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

Miscellaneous

Class Action Lawsuits
From time to time, securities held in the accounts of clients will be the subject of class action lawsuits. SIMA Wealth has no obligation to determine if securities held by the client are subject to a pending or resolved class action lawsuit. It also has no duty to evaluate a client's eligibility or to submit a claim to participate in the proceeds of a securities class action settlement or verdict. Furthermore, SIMA Wealth has no obligation or responsibility to initiate litigation to recover damages on behalf of clients who may have been injured as a result of actions, misconduct, or negligence by corporate management of issuers whose securities are held by clients.

Where SIMA Wealth receives written or electronic notice of a class action lawsuit, settlement, or verdict affecting securities owned by a client, it would forward all notices, proof of claim forms, and other materials, to the client. Electronic mail is acceptable where appropriate, and the client has authorized contact in this manner.

Trade Error Correction Procedures
On infrequent occasions, an error may be made in a client account. For example, a security may be erroneously purchased for the account instead of sold. In these situations, SIMA Wealth generally seeks to rectify the error by placing the client account in a similar position as it would have been had there been no error. Depending on the circumstances, various corrective steps may be taken, including among others canceling the trade or adjusting an allocation. Any losses resulting from error correction will be placed in SIMA Wealth's error correction account.

Confidentiality
SIMA Wealth views protecting its customers' private information as a top priority and, pursuant to the requirements of the Gramm-Leach-Bliley Act, SIMA Wealth has instituted policies and procedures to ensure that customer information is kept private and secure.

SIMA Wealth does not disclose any nonpublic personal information about its customers or former customers to any nonaffiliated third parties, except as permitted by law. In the course of servicing a client account, SIMA Wealth may share some information with its service providers, such as transfer agents, custodians, broker-dealers, accountants, and lawyers.

SIMA Wealth restricts internal access to nonpublic personal information about its clients to those employees who need to know that information in order to provide products or services to the client. SIMA Wealth maintains physical and procedural safeguards that comply with state and federal standards to guard a client's nonpublic personal information and ensure its integrity and confidentiality. As emphasized above, it has always been and will always be SIMA Wealth's policy never to sell information about current or former customers or their accounts to anyone. It is also SIMA Wealth's policy not to share information unless required to process a transaction, at the request of the client, or as required by law.

A copy of SIMA Wealth's privacy policy notice will be provided to each client prior to, or contemporaneously with, the execution of the Advisory Agreement. Thereafter, SIMA Wealth will deliver a copy of the current privacy policy notice to its clients on an annual basis. If you have any questions on this policy, please contact Mark A. Jones, Managing Member at (804) 285-5700.

SIMA Wealth Partners, LLC

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https://simafinancialgroup.com/wealth-planning/

July 29, 2026

Form ADV Part 2A, Appendix 1:
Wrap Fee Program Brochure

SIMA Wealth Partners, LLC is an investment adviser registered with the Virginia Division of Securities and Retail Franchising. An "investment adviser" means any person who, for compensation, engages in the business of advising others, either directly or through publications or writings, as to the value of securities or as to the advisability of investing in, purchasing, or selling securities, or who, for compensation and as part of a regular business, issues or promulgates analyses or reports concerning securities. Registration with the SEC or any state securities authority does not imply a certain level of skill or training.

This Wrap Fee program brochure provides information about the qualifications and business practices of SIMA Wealth Partners, LLC. If you have any questions about the contents of this brochure, please contact us at (804) 285-5700. 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 SIMA Wealth Partners, LLC is available on the SEC's website at www.adviserinfo.sec.gov. The firm's CRD number is 159943.

Material Changes - Item 2

The purpose of this page is to inform you of any material changes to this Brochure since our firm's last annual updating amendment.

On March 25, 2026, we submitted updated amendment filing, since we have made the following material changes.

Item 1: Cover Page – We have moved our offices

We review and update our brochure at least annually to make sure that it remains current. If you would like to receive a complete copy of our Form ADV Part 2 Brochure, please contact us at the contact information on the cover page of this document.

Table of Contents - Item 3

Contents

Services Fees and Compensation - Item 4 4
Account Requirements and Types of Clients - Item 5 7
Portfolio Manager Selection and Evaluation - Item 6 7
Client Information Provided to Portfolio Managers - Item 7 12
Client Contact with Portfolio Managers - Item 8 13
Additional Information - Item 9 13
Miscellaneous 16

Services Fees and Compensation - Item 4

Services
SIMA Wealth Partners, LLC (hereinafter “SIMA” or "Advisor”) offers asset management services based on the individual needs of the client. This Brochure provides a description of the advisory services offered under the SIMA Wrap Fee program. For more information about Advisor’s other investment advisory services, please contact Advisor for a copy of a similar brochure that describes such services or go to www.adviserinfo.sec.gov.

SIMA specializes in managing financial assets for individuals, families, estates, trusts, and group retirement plans. The firm is primarily focused on the selection and monitoring of specific nonproprietary investments, then using these investments inside actively managed accounts. Advisory services are typically performed in exchange for a fee which is calculated as a fractional percentage of assets managed.

At SIMA, we recognize that each client has individual objectives and goals, which are determined during the initial consultation, and reaffirmed periodically. Clients determine the level of risk they are willing to take with their assets and their estimated time horizon. The term “time horizon” refers to the amount of time clients feel they have before they think they will start spending the assets in their account, whether it be for their own retirement or some other financial objective. Our advice requires an understanding of your financial condition, goals, and tolerance for risk.

At SIMA, we believe that our clients engage with us for the advice and services we provide, along with our portfolio management strategies. Although, where applicable, transaction costs are covered by our wrap fee, they are not a significant component of our value proposition. Employees of SIMA do not pay any advisory or transaction fees.

SIMA provides discretionary investment advisory services on a fee basis as discussed at Item 5 below. Before engaging SIMA to provide investment advisory services, clients are generally required to enter into an Investment Advisory Agreement with SIMA setting forth the terms and conditions of the engagement (including termination), describing the scope of the services to be provided, and the fee that is due from the client. To commence the investment advisory process, SIMA will ascertain each client’s investment objective(s) and then allocate the client’s assets consistent with the client’s designated investment objective(s). Once allocated, SIMA provides ongoing supervision of the account(s). SIMA’s annual investment advisory fee shall generally include investment advisory services, and, to the extent specifically requested by the client, financial planning and consulting services.

Assets Under Management
As of December 31, 2025, we have approximately $156,659,083 in discretionary assets under management. We do not manage assets on a non-discretionary basis.

Fees
In the SIMA Wrap Fee program, the client generally receives investment advisory services, the execution of securities brokerage transactions, custody and reporting services for a single specified fee. The advisory fee is negotiable between the client and the Advisor and is set out in the following fee schedule:

Assets Under Management	Annual Fee
First $1,000,000	1.25%
Next $2,000,000	0.85%
Next $2,000,000	0.65%
Over $5,000,000	0.40%

Participation in the Wrap Fee Program may cost more or less than purchasing such services separately. Also, the Program fee charged by SIMA Wealth for participation in the Program may be higher or lower than those charged by other sponsors of comparable wrap fee programs.

The advisory fee is paid to Advisor and is shared between Advisor and its associated persons. Advisor does not accept performance-based fees for program accounts. The portion of the total fee paid to our portfolio managers will vary depending on the individual managing the account. Our portfolio managers' compensation may be based on a fixed salary or on a percentage of the fee charged by SIMA Wealth. This percentage may range from 20% to 50% of the total fees.

When managing a client's account on a wrap fee basis, SIMA Wealth shall receive as payment for its investment advisory services, the balance of the wrap fee after all other costs incorporated into the wrap fee have been deducted. Because wrap program transaction fees and/or commissions, though immaterial, are being paid by SIMA Wealth to the account custodian/broker-dealer, SIMA Wealth has an economic incentive to maximize its compensation by seeking to minimize the number of trades in the client's account. Under the Program, SIMA Wealth shall be provided with written authority to determine which securities and the amounts of securities that are bought or sold. Any limitations on this authority shall be included in the written agreement between each client and SIMA Wealth. Clients may change/amend these limitations, in writing, at any time. The client shall have reasonable access to one of SIMA Wealth's investment professionals to discuss their account.

You may see slight differences in the quarter-end market value of your account from your custodian's statement as compared to the billable market value of your account due to differences in the treatment of accrued interest posting, trade date versus settlement date, and other variables. You should review the information in the account statement provided by the custodian. The custodian's account statement is the official record of the holdings and value of investments held in your account(s).

The advisory fee is deducted from the account by Charles Schwab & Co., ("Schwab") as the custodian of assets based on a written authorization from the client. Schwab calculates and deducts the advisory fee quarterly in advance. If the advisory agreement is terminated before the end of the quarterly period, client is entitled to a prorated refund of any pre-paid quarterly advisory fee based on the number of days remaining in the quarter after the termination date.

At our discretion, we may combine the account values of family members to determine the applicable advisory fee. For example, we may combine account values for you, your spouse, joint accounts with your spouse, your minor children, and other types of related accounts. Combining account values will increase the calculated asset total, which may result in your paying a reduced advisory fee based on the available breakpoints in our fee schedule stated above. SIMA may, in its sole discretion, change the actual fee charged upon thirty days written notice to the client. Clients may accept the change or close the account.

We have instituted procedures to evaluate investment costs and will always attempt to find the lowest cost option. On occasion, we may invest in issues that are not the lowest cost for our clients.

Other Types of Fees and Charges
Program accounts will incur additional fees and charges from parties other than the Advisor as noted below. These fees and charges are in addition to the advisory fee paid to Advisor. Advisor does not share in any portion of these third-party fees.

Schwab, as the custodian and broker-dealer providing brokerage and execution services on program accounts, will impose certain fees and charges. Schwab notifies clients of these charges at account opening and they will deduct these fees and charges directly from the client's program account.

There are other fees and charges that are imposed by other third parties that apply to investments in program accounts. Some of these fees and charges are described below.

- If a client's assets are invested in mutual funds or other pooled investment products, clients should be aware that there will be two layers of advisory fees and expenses for those assets. Client will pay an advisory fee to the fund manager and other expenses as a shareholder of the fund. Client will also pay Advisor the advisory fee with respect to those assets. A client could invest in a mutual fund directly, without the services of SIMA. In that case, the client would not receive the services provided by SIMA, which are designed, among other things, to assist the client in determining which mutual fund or funds are most appropriate to each client's financial condition and objectives.

- Certain mutual funds impose fees and charges such as contingent deferred sales charges, early redemption fees and charges for frequent trading. These charges may apply if client transfers into or purchases such a fund with the applicable charges in a program account.

- Although only no-load and load-waived mutual funds can be purchased in a program account, client should understand that some mutual funds pay asset based sales charges or service fees (e.g., 12b-1 fees) to the custodian with respect to account holdings.

- If client holds a variable annuity as part of an account, there are mortality, expense and administrative charges, fees for additional riders on the contract and charges for excessive transfers within a calendar year imposed by the variable annuity sponsor.

Further information regarding fees assessed by a mutual fund, or variable annuity is available in the appropriate prospectus, which is available upon request from the Advisor or from the product sponsor directly.

Other Important Considerations

- The advisory fee is an ongoing wrap fee for investment advisory services, the execution of transactions and other administrative and custodial services. The advisory fee may cost the client more than purchasing the program services separately. All other costs, such as transaction costs that are immaterial, are deducted from the advisory fee and paid by SIMA to the custodian. Factors that bear upon the cost of the account in relation to the cost of the same services purchased separately include the type and size of the account, historical and or expected size, or number of trades for the account, and number and range of supplementary advisory and client-related services provided to the client.

- The advisory fee also may cost the client more than it would if assets were held in a traditional brokerage account. In a brokerage account, a client is charged a commission for each transaction, and

the representative has no duty to provide ongoing advice with respect to the account. If the client plans to follow a buy and hold strategy for the account or does not wish to purchase ongoing investment advice or management services, the client should consider opening a brokerage account rather than a program account.

- The investment products available to be purchased in the program can be purchased by clients outside of a program account, through broker-dealers or other investment firms not affiliated with Advisor.

Account Requirements and Types of Clients - Item 5

We generally offer investment advisory services to individuals, pension and profit sharing plans and participants, trusts, estates, charitable organizations, corporations, and other business entities.

SIMA requires a minimum of $500,000 to open and maintain an advisory account. At our sole discretion, we may waive this requirement. This requirement can be met by combining two or more accounts owned by you or related family members. Accounts managed by TPAs may be subject to different minimum investment requirements.

Portfolio Manager Selection and Evaluation - Item 6

Portfolio Managers
Mark Jones, CPA, AIF®, President, Jennifer Monahan Betz, Member, and Heather Anne Voight, Investment Adviser Representative act as portfolio managers for the wrap fee program described in this Wrap Fee Program Brochure. This may create a conflict of interest in that portfolio managers could place their own or SIMA's interests before a client's interest. We have adopted Compliance Procedures and a Code of Ethics that requires our portfolio managers and other employees of SIMA Wealth to adhere to their fiduciary duty and avoid activities, interests and relationships that run contrary (or appear to run contrary) to the best interests of clients.

We review a number of different criteria when reviewing our portfolio managers including: years of investment management experience, educational background, professional designations, ability to work in a team environment, compatibility with our investment management style, etc. Neither we nor any third-party review performance information to determine or verify its accuracy.

We have chosen not to utilize outside portfolio managers, and therefore, there is no selection and review of outside portfolio managers that could be inconsistent with the selection and review of our internal portfolio managers.

Our portfolio managers are registered as investment adviser representatives in the State of Virginia. For more information about the associated person of Advisor managing the account, client should refer to the ADV Part 2B Brochure Supplement for the associated person, which client should have received along with this Brochure at the time client opened the account. Client may also contact SIMA Wealth at the contact information on the cover page of this document if they have any questions about our portfolio managers.

Schwab performs certain administrative services for Advisor, including generation of quarterly performance reports for program accounts. Client will receive an individual quarterly performance report, which provides performance information on a time-weighted basis. The performance reports are intended to inform clients as to how their investments have performed for a period, both on an absolute basis and compared to leading investment indices.

In addition to providing advisory services under the SIMA Wrap Fee program, we offer the following investment advisory services, personalized to each individual client:

Financial Planning Services
We offer broad based financial planning including tax planning, insurance planning, estate planning, disability planning, business planning, retirement planning, education planning, and budgeting and cash flow analysis. SIMA strives to achieve a client's long-term financial goals by implementing a financial planning process that may include any or all of the following steps:

- Assessment of a client's present financial situation by collecting information regarding net worth and cash flow statements, tax returns, insurance policies, investment portfolios, pension plans, employee benefit statements etc.
- Identification of a client's financial and personal goals and objectives. Goals or objectives may include financing a child's college education or retirement planning. The identified goals or objectives are specific, realistic, and measurable. All goals include time horizons.
- Resolution of finance related problems. Obstacles to achieving financial independence are identified so that resolution may occur. Examples of problem areas can include too little or too much insurance coverage, inadequate cash flow or a high tax burden.
- Plan Design. A written financial plan is prepared that includes recommendations and solutions to any financial related problems.
- Implementation of the financial plan. The financial plan is finalized and agreed upon. The recommendations and solutions are executed to reach the desired goals and objectives.
- Evaluation of the financial plan is conducted periodically. The financial planning service provides the option of conducting a periodic review and revision of the plan to ensure that the financial goals are achieved. The client may be required to pay an additional fee to exercise this option.

Financial plans are based on your financial situation and the financial information you provide to SIMA Wealth. If your financial situation, goals, objectives, or needs change, you must notify us promptly.

We also provide financial planning services that cover a specific area, such as retirement or estate planning. We offer consultative services where we set an appointment to meet with you for financial planning advice for an hourly fee.

You may choose to accept or reject our recommendations. If you decide to proceed with our recommendations, you may do so either through our investment advisory services or by using the advisory/brokerage firm of your choice.

Selection of Third-Party Investment Advisers
SIMA has entered into agreements with various third-party investment advisers for the provision of certain investment advisory services. Factors considered in the selection of a third-party advisor include but may not be limited to: i) SIMA's preference for a particular third-party advisor; ii) the client's risk tolerance, goals and objectives, as well as investment experience; and, iii) the amount of client assets available for investment. In order to assist clients in the selection of a third-party advisor, an Associated Person of SIMA will typically gather information from the client about the client's financial situation, investment objectives, and reasonable restrictions the client wants imposed on the management of the account.

The third-party advisor may customize the client's portfolio by blending traditional investment strategies with an allocation to asset classes. The investment strategy adopted by the third-party advisor may embrace value, growth, or contrarian investing styles. Generally, securities transactions will be decided upon and executed by the third-party advisor on a discretionary basis. This means that the manager selected will have the ability to buy and sell securities in your account without obtaining your approval. SIMA and its Associated Persons will not manage, or obtain discretionary authority over the assets in accounts participating in these programs; however, clients may grant SIMA the discretionary authority to hire and fire such third-party managers. Generally, clients may not impose restrictions on investing in certain securities or types of securities in accounts managed by a third-party advisor.

Associated Persons of SIMA will periodically review reports provided to the client. An Associated Person of SIMA will contact the client at least annually, or more often as agreed upon with each client, to review the client's financial situation and objectives, communicate information to the third-party advisor managing the account as necessary, and to assist the client in understanding and evaluating the services provided by the third-party advisor. Clients will be expected to notify SIMA of any changes in their financial situation, investment objectives, or account restrictions.

The third-party advisor may offer wrapped or non-wrapped pricing options. Wrap pricing structures allow the client to pay an all-inclusive fee for management, brokerage, clearance, custody, and administrative services. In a non-wrap pricing structure, the third-party advisor's fee may be separated from the advisory fee charged by SIMA. Transaction costs may also be charged for the execution and clearance of advisory transactions directed by such Third-Party Advisory Services. A complete description of the programs and services provided, the amount of total fees, the payment structure, termination provisions and other aspects of each program are detailed and disclosed in: i) the third-party advisor's Form ADV Part 2A; ii) the program wrap brochure (if applicable) or other applicable disclosure documents; iii) the disclosure documents of the portfolio manager(s) selected; or, iv) the third-party advisor's account opening documents. A copy of all relevant disclosure documents of the third-party advisor and of the individual portfolio manager(s) will be provided to anyone interested in these programs/managers.

Performance-Based Fees and Side-By-Side Management
We and our Associated Persons do not accept performance-based fees. Performance based fees are based on a share of capital gains on or capital appreciation of the client's assets.

Methods of Analysis, Investment Strategies and Risk of Loss
The following are different methods of analysis that we may use when providing you with investment advice:

- Fundamental Analysis – this approach attempts to determine a security's value by focusing on underlying factors that affect a company's actual business and its future prospects. The term refers to the analysis of the economic well-being of a financial entity as opposed to only its price movements.
- Tactical Analysis – this approach aims to take advantage of inefficiencies in asset pricing while avoiding overpriced assets. Tactical Analysts believe that making periodic changes in the amounts invested within different asset classes can enhance investment returns and reduce risk.

We may use one or more of the following investment strategies when advising you on investments:

- Long Term Purchases – securities held for over a year.
- Short Term Purchases – securities held for less than a year.
- Trading – securities held for less than 30 days.

The investment advice provided along with the strategies suggested by SIMA will vary depending on each client's specific financial situation and goals. This brief statement does not disclose all of the risks and other

significant aspects of investing in financial markets. In light of the risks, you should fully understand the nature of the contractual relationship(s) into which you are entering and the extent of your exposure to risk. Certain investing strategies may not be suitable for many members of the public. You should carefully consider whether the strategies employed would be appropriate for you in light of your experience, objectives, financial resources and other relevant circumstances.

General Investment Risk: All investments come with the risk of losing money. Investing involves substantial risks, including complete possible loss of principal plus other losses and may not be suitable for many members of the public. Investments, unlike savings and checking accounts at a bank, are not insured by the government to protect against market losses. Different market instruments carry different types and degrees of risk and you should familiarize yourself with the risks involved in the particular market instruments in which you intend to invest.

Loss of Value: There can be no assurance that a specific investment will achieve its investment objectives and past performance should not be seen as a guide to future returns. The value of investments and the income derived may fall as well as rise and investors may not recoup the original amount invested. Investments may also be affected by any changes in exchange control regulation, tax laws, withholding taxes, international, political, and economic developments, and government, economic or monetary policies.

Interest Rate Risk: Fixed income securities and funds that invest in bonds and other fixed income securities may fall in value if interest rates change. Generally, the prices of debt securities rise when interest rates fall, and their prices fall when interest rates rise. Longer-term debt securities are usually more sensitive to interest rate changes.

Credit Risk: Investments in bonds and other fixed income securities are subject to the risk that the issuer(s) may not make required interest payments. An issuer suffering an adverse change in its financial condition could lower the credit quality of a security, leading to greater price volatility of the security. A lowering of the credit rating of a security may also offset the security's liquidity, making it more difficult to sell. Funds investing in lower quality debt securities are more susceptible to these problems and their value may be more volatile.

Foreign Exchange Risk: Foreign investments may be affected favorably or unfavorably by exchange control regulations or changes in the exchange rates. Changes in currency exchange rates may influence the share value, the dividends or interest earned and the gains and losses realized. Exchange rates between currencies are determined by supply and demand in the currency exchange markets, the international balance of payments, governmental intervention, speculation, and other economic and political conditions. If the currency in which a security is denominated appreciates against the US Dollar, the value of the security will increase. Conversely, a decline in the exchange rate of the currency would adversely affect the value of the security.

Risks Associated with Investing in Options: Transactions in options carry a high degree of risk. A relatively small market movement will have a proportionately larger impact, which may work for or against the investor. The placing of certain orders, which are intended to limit losses to certain amounts, may not be effective because market conditions may make it impossible to execute such orders. Selling ("writing" or "granting") an option generally entails considerably greater risk than purchasing options. Although the premium received by the seller is fixed, the seller may sustain a loss well in excess of that amount. The seller will also be exposed to the risk of the purchaser exercising the option and the seller will be obliged either to settle the option in cash or to acquire or deliver the underlying investment. If the option is "covered" by the seller holding a corresponding position in the underlying investment or a future on another option, the risk may be reduced.

Concentrated Position Risk: Certain Associated Persons may recommend that clients concentrate account assets in an industry or economic sector. In addition to the potential concentration of accounts in one or more sectors, certain accounts may, or may be advised to, hold concentrated positions in specific securities.

Therefore, at times, an account may, or may be advised to, hold a relatively small number of securities positions, each representing a relatively large portion of assets in the account. As a result, the account will be subject to greater volatility than a more sector diversified portfolio. Investments in issuers within an industry or economic sector that experiences adverse economic, business, political conditions or other concerns will impact the value of such a portfolio more than if the portfolio's investments were not so concentrated. A change in the value of a single investment within the portfolio will affect the overall value of the portfolio and will cause greater losses than it would in a portfolio that holds more diversified investments.

Preferred Securities Risk: Preferred Securities have similar characteristics to bonds in that preferred securities are designed to make fixed payments based on a percentage of their par value and are senior to common stock. Like bonds, the market value of preferred securities is sensitive to changes in interest rates as well as changes in issuer credit quality. Preferred securities, however, are junior to bonds with regard to the distribution of corporate earnings and liquidation in the event of bankruptcy. Preferred securities that are in the form of preferred stock also differ from bonds in that dividends on preferred stock must be declared by the issuer's board of directors, whereas interest payments on bonds generally do not require action by the issuer's board of directors, and bondholders generally have protections that preferred stockholders do not have, such as indentures that are designed to guarantee payments – subject to the credit quality of the issuer – with terms and conditions for the benefit of bondholders. In contrast preferred stocks generally pay dividends, not interest payments, which can be deferred or stopped in the event of credit stress without triggering bankruptcy or default. Another difference is that preferred dividends are paid from the issue's after-tax profits, while bond interest is paid before taxes.

Inverse Funds: Inverse mutual funds and ETFs, which are sometimes referred to as "short" funds, seek to provide the opposite of the single-day performance of the index or benchmark they track. Inverse funds are often marketed as a way to profit from, or hedge exposure to, downward moving markets. Some inverse funds also use leverage, such that they seek to achieve a return that is a multiple of the opposite performance of the underlying index or benchmark (i.e., -200%, -300%). In addition to leverage, these funds may also use derivative instruments to accomplish their objectives. As such, inverse funds are highly volatile and provide the potential for significant losses.

Cybersecurity Risks: Our firm and our service providers are subject to risks associated with a breach in cybersecurity. Cybersecurity is a generic term used to describe the technology, processes, and practices designed to protect networks, systems, computers, programs, and data from cyber-attacks and hacking by other computer users, and to avoid the resulting damage and disruption of hardware and software systems, loss or corruption of data, and/or misappropriation of confidential information. In general, cyber-attacks are deliberate; however, unintentional events may have similar effects. Cyber-attacks may cause losses to clients by interfering with the processing of transactions, affecting the ability to calculate net asset value or impeding or sabotaging trading. Clients may also incur substantial costs as the result of a cybersecurity breach, including those associated with forensic analysis of the origin and scope of the breach, increased and upgraded cybersecurity, identity theft, unauthorized use of proprietary information, litigation, and the dissemination of confidential and proprietary information. Any such breach could expose our firm to civil liability as well as regulatory inquiry and/or action. In addition, clients could be exposed to additional losses as a result of unauthorized use of their personal information. While our firm has established a business continuity plan and systems designed to prevent cyber-attacks, there are inherent limitations in such plans and systems, including the possibility that certain risks have not been identified. Similar types of cyber security risks are also present for issuers of securities, investment companies and other investment advisers in which we invest, which could result in material adverse consequences for such entities and may cause a client's investment in such entities to lose value.

Pandemic Risk: Large-scale outbreaks of infectious disease can greatly increase morbidity and mortality over a wide geographic area, crossing international boundaries, and causing significant economic, social, and political

disruption. It is difficult to predict the long-term impact of such events because they are dependent on a variety of factors including the global response of regulators and governments to address and mitigate the worldwide effects of such events. Workforce reductions, travel restrictions, governmental responses and policies and macroeconomic factors will negatively impact investment returns.

Cryptocurrency Risk: Cryptocurrency (e.g., bitcoin and ether), often referred to as "virtual currency", "digital currency," or "digital assets," is designed to act as a medium of exchange. Cryptocurrency is an emerging asset class. There are thousands of cryptocurrencies, the most well-known of which is bitcoin. Certain of the firm's clients may have exposure to bitcoin or another cryptocurrency, directly or indirectly through an investment such as an ETF or other investment vehicles. Cryptocurrency operates without central authority or banks and is not backed by any government. Cryptocurrencies may experience very high volatility and related investment vehicles may be affected by such volatility. As a result of holding cryptocurrency, certain of the firm's clients may also trade at a significant premium or discount to NAV. Cryptocurrency is also not legal tender. Federal, state or foreign governments may restrict the use and exchange of cryptocurrency, and regulation in the U.S. is still developing. The market price of many cryptocurrencies, including bitcoin, has been subject to extreme fluctuations. If cryptocurrency markets continue to be subject to sharp fluctuations, investors may experience losses if the value of the client's investments decline. Similar to fiat currencies (i.e., a currency that is backed by a central bank or a national, supra-national or quasi-national organization), cryptocurrencies are susceptible to theft, loss and destruction. Cryptocurrency exchanges and other trading venues on which cryptocurrencies trade are relatively new and, in most cases, largely unregulated and may therefore be more exposed to fraud and failure than established, regulated exchanges for securities, derivatives and other currencies. The SEC has issued a public report stating U.S. federal securities laws require treating some digital assets as securities.

Cryptocurrency exchanges may stop operating or permanently shut down due to fraud, technical glitches, hackers or malware. Due to relatively recent launches, most cryptocurrencies have a limited trading history, making it difficult for investors to evaluate investments. Generally, cryptocurrency transactions are irreversible such that an improper transfer can only be undone by the receiver of the cryptocurrency agreeing to return the cryptocurrency to the original sender. Digital assets are highly dependent on their developers and there is no guarantee that development will continue or that developers will not abandon a project with little or no notice. Third parties may assert intellectual property claims relating to the holding and transfer of digital assets, including cryptocurrencies, and their source code. Any threatened action that reduces confidence in a network's long-term ability to hold and transfer cryptocurrency may affect investments in cryptocurrencies.

Many significant aspects of the U.S. federal income tax treatment of investments in cryptocurrency are uncertain and an investment in cryptocurrency may produce income that is not treated as qualifying income for purposes of the income test applicable to regulated investment companies. Certain cryptocurrency investments may be treated as a grantor trust for U.S. federal income tax purposes, and an investment by the firm's clients in such a vehicle will generally be treated as a direct investment in cryptocurrency for tax purposes and "flow-through" to the underlying investors.

Proxy Voting
SIMA does not vote proxies. It is the client's responsibility to vote proxies. Clients will receive proxy materials directly from the custodian. Questions about proxies may be made via the contact information on the cover page.

Client Information Provided to Portfolio Managers - Item 7

Mark Jones, CPA, AIF®, President, Jennifer Monahan Betz, Member, and Heather Anne Voight, Investment Adviser Representative, are the sole portfolio managers to the Program. Mr. Jones, Ms. Betz and Ms. Voight have access to all information provided by clients. Client information will be updated during client meetings.

Client Contact with Portfolio Managers - Item 8

Associated Persons are the sole portfolio managers to the Program. Clients are free to contact us at any time. Our primary contacts regarding questions about the Program are Mark Jones, CPA, AIF®, President and Jennifer Monahan Betz, Member. Clients may contact them at (804) 285-5700.

Additional Information - Item 9

Disciplinary Information
Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of us or the integrity of our management. There is no history of material legal or disciplinary events by SIMA Wealth or our management persons.

Other Financial Industry Activities or Affiliations
Mark Allen Jones, Managing Member of SIMA Wealth, is the President and sole shareholder of SIMA Financial Group, Inc., a financial services company. Associated persons of SIMA market their advisory services thorough this entity.

Certain associates of the firm are also insurance agents licensed to sell insurance products. A conflict of interest exists in that these services pay a commission, which conflicts with the IAR's fiduciary duties. {{case|977071}} does not require its IARs to encourage clients to implement investment advice through our insurance product recommendations. Clients have the right to implement insurance product recommendations through the insurance agency and agent of their choice. We require that all IARs disclose this conflict of interest when such recommendations are made. We also require IARs to disclose that the client has the right to purchase recommended products from individuals not affiliated with us.

SIMA Financial Group, Inc. is also the holding company of SIMA Payroll Solutions, LLC. SIMA Payroll Solutions, LLC offers payroll processing services to its clients.

In addition, SIMA Financial Group, Inc. is the holding company for SIMA Technology Group, LLC. SIMA Technology Group, LLC offers technology managed services such as IT consulting, computer networking, backup & recovery systems to its clients.

Mr. Jones is the Managing Member and majority owner of SIMA Accounting Group, LLC, a full service certified public accounting firm providing a wide range of accounting services to individuals and business clients. Certain Associated Persons of SIMA Wealth may also offer accounting services through SIMA Accounting Group, LLC. Associated Persons of SIMA Wealth may recommend SIMA Accounting Group, LLC to their clients. As such, clients should be aware that a conflict of interest is inherent in such an arrangement. However, clients of one firm are not required to use the services of any affiliated firm.

Mr. Jones currently devotes approximately 65% of his time to SIMA Accounting Group, SIMA Payroll Solutions, and SIMA Technology Group.

Ms. Betz devotes approximately 10% of her time to SIMA Accounting Group; 40% to SIMA Retirement Solutions and 50% to SIMA Wealth Partners.

Persons associated with SIMA Wealth may also be associated with SIMA Retirement Solutions, LLC ("SIMA Retirement"), a Virginia based, registered investment adviser. We are affiliated through common control and ownership with SIMA Retirement. We may recommend that plan sponsors utilize retirement plan consulting services offered by SIMA Retirement. SIMA Wealth will not directly share in the compensation received by SIMA Retirement, but individuals associated with SIMA Wealth who are also associated with SIMA Retirement may be compensated in their capacities as owners, officers, and/or investment adviser representatives of SIMA Retirement. Associated Persons and we may have a financial incentive to recommend the services of SIMA Retirement. However, you are not required to use the services of SIMA Retirement.

Mr. Jones currently devotes approximately 10% of his time as the Managing Member, Chief Compliance Officer, and as an Investment Adviser Representative of SIMA Retirement.

Associated Persons and we have a financial incentive to recommend the services of one or more of our affiliates. This creates a material conflict of interest. However, you are not required to purchase products through or to use the services of any of our affiliates or associated persons.

Description of Our Code of Ethics
SIMA has adopted a Code of Ethics (the "Code") to address investment advisory conduct. The Code focuses primarily on fiduciary duty, personal securities transactions, insider trading, gifts, and conflicts of interest. The Code includes SIMA's policies and procedures developed to protect client's interests in relation to the following topics:

- The duty at all times to place the interests of clients first;
- The requirement that all personal securities transactions be conducted in such a manner as to be consistent with the code of ethics.
- The responsibility to avoid any actual or potential conflict of interest or misuse of an employee's position of trust and responsibility;
- The fiduciary principle that information concerning the identity of security holdings and financial circumstances of clients is confidential; and
- The principle that independence in the investment decision-making process is paramount.

A copy of SIMA's Code of Ethics is available upon request to Mark Allen Jones, Managing Member and Jennifer Monahan Betz, Member, at (804) 285-5700.

Personal Trading Practices
At times, SIMA and/or its Advisory Representatives may take positions in the same securities as clients, which may pose a conflict of interest with clients. SIMA and its Advisory Representatives will generally be "last in" and "last out" for the trading day when trading occurs in close proximity to client trades. We will not violate our fiduciary responsibilities to our clients. Front running (trading shortly ahead of clients) is prohibited. Should a conflict occur because of materiality (i.e. a thinly traded stock), disclosure will be made to the client(s) at the time of trading. Incidental trading not deemed to be a conflict (i.e. a purchase or sale which is minimal in relation to the total outstanding value, and as such would have negligible effect on the market price), would not be disclosed at the time of trading.

Portfolio Management Account Reviews
Mark Allen Jones, Managing Member, Jennifer Monahan Betz, Member, and Heather Anne Voight, Investment Adviser Representative, monitor client accounts on a continuous basis and conducts account reviews at least annually.

Additional reviews may be offered in certain circumstances. Triggering factors that may stimulate additional reviews include, but are not limited to, changes in economic conditions, changes in the client's financial situation or investment objectives, or a client's request.

A financial plan is a snapshot in time and no ongoing reviews are conducted. We recommend clients engage us on an annual basis to update the financial plan.

Statements and Reports
Clients will receive statements directly from their account custodian(s) on at least a quarterly basis. Additionally, clients will receive a performance report as part of their annual account review.

Custody
SIMA Wealth is deemed to have "limited" custody of client funds because of the fee deduction authority granted by the client in the Advisory Agreement.

With respect to third party standing letters of authorization ("SLOA") where a client grants us authority to direct custodians to disburse funds to one or more third party accounts, we are deemed to have custody pursuant to Rule 206(4)-2 (the "Custody Rule"). We have taken steps to have controls and oversight in place to comply with the no-action letter issued by the SEC on February 21, 2017 (the "SEC no-action letter"). We are not required to comply with the surprise examination requirements of the Custody Rule if we comply with the representations noted in the SEC no-action letter. Where our firm acts pursuant to a SLOA, we believe we are making a good faith effort to comply with the representations noted in the SEC no-action letter. Additionally, since many of the representations noted in the SEC no-action letter involve the qualified custodian's operations, we will collaborate with our custodian(s) to ensure that the representations are met.

Additionally, related persons of SIMA Wealth may serve as trustees to certain accounts for which we provide investment advisory services. This capacity gives SIMA Wealth custody over the advisory accounts for which our related persons serve as trustees. These trustee capacities are in direct relation to a family or personal relationship that meets the criteria in the SEC's Final Rule on Custody (see FN #139) and thus, these assets are not subject to the annual custody exam.

Clients will receive account statements at least quarterly from the broker-dealer or other qualified custodian. It is the client's responsibility to review custodial account statements for accuracy. If you have a question regarding your account statement or if you did not receive a statement from your custodian, please contact Mark A. Jones, Managing Member at (804) 285-5700.

Client Referrals and Other Compensation
We receive an economic benefit from Schwab in the form of the support products and services it makes available to us and other independent investment advisors that have their clients maintain accounts at Schwab. These products and services, how they benefit us, and the related conflicts of interest are described above (see Item 12 – Brokerage Practices Section of our Form ADV Part 2A Brochure). The availability to us of Schwab's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

Our related persons and we do not compensate, directly or indirectly, any person or entity who is not our supervised person for client referrals.

Financial Information
We are required in this Item to provide you with certain financial information or disclosures about SIMA's financial condition. SIMA does not require the prepayment of over $1,200, six or more months in advance. Additionally, SIMA has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

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Miscellaneous

Class Action Lawsuits
From time to time, securities held in the accounts of Clients will be the subject of class action lawsuits. SIMA has no obligation to determine if securities held by the Client are subject to a pending or resolved class action lawsuit. It also has no duty to evaluate a Client's eligibility or to submit a claim to participate in the proceeds of a securities class action settlement or verdict. Furthermore, SIMA Wealth has no obligation or responsibility to initiate litigation to recover damages on behalf of Clients who may have been injured as a result of actions, misconduct, or negligence by corporate management of issuers whose securities are held by Clients. Where SIMA Wealth receives written or electronic notice of a class action lawsuit, settlement, or verdict affecting securities owned by a Client, it would forward all notices, proof of claim forms, and other materials, to the Client. Electronic mail is acceptable where appropriate, and the Client has authorized contact in this manner.

Trade Error Correction Procedures
On infrequent occasions, an error may be made in a Client account. For example, a security may be erroneously purchased for the account instead of sold. In these situations, SIMA Wealth generally seeks to rectify the error by placing the Client account in a similar position as it would have been had there been no error. Depending on the circumstances, various corrective steps may be taken, including among others canceling the trade or adjusting an allocation. Any losses resulting from error correction will be placed in SIMA's error correction account.

Mark A. Jones, CPA, AIF®

Managing Member/Investment Adviser Representative
CRD# 2952463

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https://simafinancialgroup.com/wealth-planning/

July 29, 2026

Form ADV Part 2B Brochure

This Brochure Supplement provides information about Mark A. Jones that supplements the SIMA Wealth Partners, LLC (hereinafter "SIMA Wealth") Brochure. You should have received a copy of that Brochure. Please contact us at (804) 285-5700 if you did not receive SIMA Wealth's Brochure or if you have any questions about the contents of this supplement.

Additional information about Mark A. Jones is available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience - Item 2

Mark Allen Jones, CPA, AIF®
Year of Birth: 1959
Formal Education after High School:

- Virginia Polytechnic Institute and State University, Accounting, 1981
- Virginia Commonwealth University, Masters in Taxation, 1990

Business Background for the last 5 Years:

- SIMA Retirement Solutions, LLC, Managing Member, 05/2016 to Present; Chief Compliance Officer and Investment Adviser Representative, 03/2017 to Present.
- SIMA Wealth Partners, LLC, Managing Member/Investment Adviser Representative, 04/2011 to Present.
- SIMA Accounting Group, LLC, Managing Partner, 03/2012 to Present
- SIMA Payroll Solutions, LLC, Owner, 03/2012 to Present
- SIMA Benefits Consulting Group, LLC, Agent, 02/2012 to 06/2026
- Purshe Kaplan Sterling Investments, Registered Representative, 10/2013 to 12/2016.
- LPL Financial, LLC, Registered Representative, 09/2009 to 09/2013.
- LPL Financial, LLC, Investment Adviser Representative, 09/2009 to 09/2013.
- Mutual Service Corporation, Registered Representative, 09/1997 to 09/2009.
- Mutual Service Corporation, Investment Adviser Representative, 09/2003 to 09/2009.

Professional Designations and Qualifications:
Certified Public Accountant (CPA)
CPAs are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include minimum college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting), minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA), and successful passage of the Uniform CPA Examination. In order to maintain a CPA license, states generally require the completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a two-year period or 120 hours over a three-year period). Additionally, all American Institute of Certified Public Accountants (AICPA) members are required to follow a rigorous Code of Professional Conduct which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interest (and obtain client consent if a conflict exists), maintain client confidentiality, disclose to the client any commission or referral fees, and serve the public interest when providing financial services. The vast majorities of state boards of accountancy have adopted the AICPA's Code of Professional Conduct within their state accountancy laws or have created their own.

Accredited Investment Fiduciary® (AIF®)
The AIF designation certifies that the recipient has specialized knowledge of fiduciary standards of care and their application to the investment management process. To receive the AIF designation, individuals must complete a training program, successfully pass a comprehensive, closed-book final examination under the supervision of a proctor, and agree to abide by the AIF Code of Ethics. In order to maintain the AIF designation, the individual must annually renew their affirmation of the AIF Code of Ethics and complete six hours of continuing education credits. The certification is administered by the Center for Fiduciary Studies, the standards-setting body of fi360.

Disciplinary Information - Item 3

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Mr. Jones and SIMA Wealth. Mr. Jones has not been involved in any reportable disciplinary events.

Other Business Activities - Item 4

Mr. Jones is the President and sole shareholder of SIMA Financial Group, Inc., a financial services company. Associated persons of SIMA Wealth market their securities and advisory services thorough this entity.

Mr. Jones is also an insurance agent licensed to sell insurance products. A conflict of interest exists because these services pay a commission, which conflicts with the IAR's fiduciary duties. SIMA Wealth does not require its IARs to encourage clients to implement investment advice through our insurance product recommendations. Clients have the right to implement insurance product recommendations through the insurance agency and agent of their choice. We require that all IARs disclose this conflict of interest when such recommendations are made. We also require IARs to disclose that the client has the right to purchase recommended products from individuals not affiliated with us .

SIMA Financial Group, Inc. is also the holding company of SIMA Payroll Solutions, LLC. SIMA Payroll Solutions, LLC offers payroll processing services to its clients.

In addition, SIMA Financial Group, Inc. is the holding company for SIMA Technology Group, LLC. SIMA Technology Group, LLC offers technology managed services such as IT consulting, computer networking, backup & recovery systems to its clients.

Mr. Jones is the Managing Member and majority owner of SIMA Accounting Group, LLC, a full service certified public accounting firm providing a wide range of accounting services to individuals and business clients. Certain Associated Persons of SIMA Wealth may also offer accounting services through SIMA Accounting Group, LLC. Associated Persons of SIMA Wealth may recommend SIMA Accounting Group, LLC to their clients. As such, clients should be aware that a conflict of interest is inherent in such an arrangement. However, clients of one firm are not required to use the services of any affiliated firm.

Mr. Jones currently devotes approximately 65% of his time to SIMA Accounting Group, SIMA Payroll Solutions, and SIMA Technology Group.

SIMA Financial Group, Inc. is also the sole owner and a Managing Member of SIMA Retirement Solutions, LLC (SIMA Retirement). SIMA Retirement offers educational, consulting, review, and support services to retirement plans.

We are affiliated through common control and ownership with SIMA Retirement. We may recommend that plan participants use SIMA Wealth for the management of their outside assets. SIMA Wealth will not directly share in the compensation received by SIMA Retirement, but individuals associated with our firm who are also associated with SIMA Retirement may be compensated in their capacities as owners, officers, and/or investment adviser representatives of SIMA Retirement.

Mr. Jones spends approximately 10% of his professional time as the Managing Member, Chief Compliance Officer, and as an Investment Adviser Representative of SIMA Retirement.

Associated Persons and we may have a financial incentive to recommend the services of one or more of our affiliates. However, you are not required to purchase products through or to use the services of any of our affiliates or associated persons.

Additional Compensation – Item 5

Apart from the receipt of additional compensation from his accounting, payroll, and insurance businesses, Mr. Jones does not receive additional compensation or economic benefits from third party sources in connection to his advisory activities.

Supervision - Item 6

Mr. Jones is an investment adviser representative of SIMA Wealth. In this role, Mr. Jones is responsible for the monitoring of client portfolios for investment objectives and other supervisory reviews. Mr. Jones is also the Chief Compliance Officer of SIMA Wealth. In this capacity, Mr. Jones is responsible for the implementation of the firm's compliance program and supervision of the firm's personnel. Mr. Jones can be reached at (804) 285-5700.

SIMA Wealth has implemented a Code of Ethics and an internal compliance program that guides each Associated Person in meeting their fiduciary obligations to clients. Mr. Jones adheres to SIMA Wealth's code of ethics and compliance manual as mandated. Clients may contact Mr. Jones at the phone number listed on the cover of this Brochure Supplement, to obtain a copy of SIMA Wealth's code of ethics.

Additionally, SIMA Wealth is subject to regulatory oversight by various agencies. These agencies require registration by SIMA Wealth and certain employees. As a registered entity, SIMA Wealth is subject to examinations by regulators, which may be announced or unannounced. SIMA Wealth is required to periodically update the information provided to these agencies and to provide various reports regarding firm business and assets under management.

Jennifer Monahan Betz

Member/Investment Adviser Representative
CRD #5153751

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July 29, 2026

Form ADV Part 2B Brochure

This Brochure Supplement provides information about Jennifer Monahan Betz that supplements the SIMA Wealth Partners, LLC (hereinafter "SIMA Wealth") Brochure. You should have received a copy of that Brochure. Please contact us at (804) 285-5700 if you did not receive SIMA Wealth's Brochure or if you have any questions about the contents of this supplement.

Additional information about Jennifer Monahan Betz is available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience - Item 2

Jennifer Monahan Betz
Year of Birth: 1982
Formal Education after High School:

- James Madison University, Marketing, 2004

Business Background for the last 5 Years:

- SIMA Retirement Solutions, LLC, Investment Adviser Representative, 03/2017 to Present.
- SIMA Wealth Partners, LLC, Partner/Member, 04/2011 to Present; Investment Adviser Representative, 10/2012 to Present.
- SIMA Accounting Group, LLC, Accountant, 03/2012 to Present.

Disciplinary Information - Item 3

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Ms. Betz and SIMA Wealth. Ms. Betz has not been involved in any reportable disciplinary events.

Other Business Activities - Item 4

Ms. Betz offers accounting services through SIMA Accounting Group, LLC, a full service certified public accounting firm providing a wide range of accounting services to individuals and business clients. Ms. Betz may recommend SIMA Accounting Group, LLC to her clients. As such, clients should be aware that a conflict of interest is inherent in such an arrangement. Clients of one firm are not required to use the services of any affiliated firm. Ms. Betz currently devotes approximately 10% of her time to her accounting activities.

We are also affiliated through common control and ownership with SIMA Retirement Solutions, LLC. (SIMA Retirement), a Virginia based, registered investment adviser. Ms. Betz is dually registered as an investment adviser representative with SIMA Retirement. She may recommend that plan sponsors utilize retirement plan consulting services offered by SIMA Retirement. SIMA Wealth will not directly share in the compensation received by SIMA Retirement, but Ms. Betz may be compensated in her capacity as an investment adviser representative of SIMA Retirement. She may have a financial incentive to recommend the services of SIMA Retirement. However, you are not required to use the services of SIMA Retirement. Ms. Betz by currently devotes approximately 40% of her time to her advisory activities with SIMA Retirement.

Additional Compensation – Item 5

Ms. Betz does not receive additional compensation or economic benefits from third party sources in connection to her advisory activities.

Supervision - Item 6

Ms. Betz is an investment adviser representative of SIMA Wealth. In this role, Ms. Betz is responsible for the monitoring of client portfolios for investment objectives and other supervisory reviews. Ms. Betz is supervised by Mark A. Jones, CPA, AIF, the Managing Member of SIMA Wealth. Mr. Jones can be reached at (804) 285-5700.

SIMA Wealth has implemented a Code of Ethics and an internal compliance program that guides each Associated Person in meeting their fiduciary obligations to clients. Ms. Betz adheres to SIMA Wealth's code of ethics and compliance manual as mandated. Clients may contact Ms. Betz at the phone number listed on the cover of this Brochure Supplement, to obtain a copy of SIMA Wealth's code of ethics.

Additionally, SIMA Wealth is subject to regulatory oversight by various agencies. These agencies require registration by SIMA Wealth and certain employees. As a registered entity, SIMA Wealth is subject to examinations by regulators, which may be announced or unannounced. SIMA Wealth is required to periodically update the information provided to these agencies and to provide various reports regarding firm business and assets under management.

Heather A. Voight

Investment Adviser Representative
CRD# 6708997

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July 29, 2026

Form ADV Part 2B Brochure

This Brochure Supplement provides information about Heather A. Voight that supplements the SIMA Wealth Partners, LLC (hereinafter "SIMA Wealth") Brochure. You should have received a copy of that Brochure. Please contact us at (804) 285-5700 if you did not receive SIMA Wealth's Brochure or if you have any questions about the contents of this supplement.

Additional information about Heather A. Voight is available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience - Item 2

Heather A. Voight
Year of Birth: 1980
Formal Education after High School:

- Virginia Commonwealth University, M.B.A., 2012
- University of Virginia, B.A., Economics and Finance, 2003

Business Background for the last 5 Years:

- SIMA Retirement Solutions, LLC, Investment Adviser Representative, 11/2021 to Present.
- SIMA Wealth Partners, LLC, Investment Adviser Representative, 11/2021 to Present.
- SunTrust Advisory Services LLC, Investment Analyst, 11/2016 to 11/2021
- SunTrust Bank, Investment Analyst, 10/2016 to 11/2021

Disciplinary Information - Item 3

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Ms. Voight and SIMA Wealth. Ms. Voight has not been involved in any reportable disciplinary events.

Other Business Activities - Item 4

We are also affiliated through common control and ownership with SIMA Retirement Solutions, LLC. (SIMA Retirement), a Virginia based, registered investment adviser. Ms. Voight is dually registered as an investment adviser representative with SIMA Retirement. She may recommend that plan sponsors utilize retirement plan consulting services offered by SIMA Retirement. SIMA Wealth will not directly share in the compensation received by SIMA Retirement, but Ms. Voight may be compensated in her capacity as an investment adviser representative of SIMA Retirement. She may have a financial incentive to recommend the services of SIMA Retirement. However, you are not required to use the services of SIMA Retirement. Ms. Voight by currently devotes approximately 5% of her time to her advisory activities with SIMA Retirement.

Additional Compensation – Item 5

Ms. Voight does not receive additional compensation or economic benefits from third party sources in connection to her advisory activities.

Supervision - Item 6

Ms. Voight is an investment adviser representative of SIMA Wealth. In this role, Ms. Voight is responsible for the monitoring of client portfolios for investment objectives and other supervisory reviews. Ms. Voight is supervised by Mark A. Jones, CPA, AIF, the Managing Member of SIMA Wealth. Mr. Jones can be reached at (804) 285-5700.

SIMA Wealth has implemented a Code of Ethics and an internal compliance program that guides each Associated Person in meeting their fiduciary obligations to clients. Ms. Voight adheres to SIMA Wealth's code of ethics and compliance manual as mandated. Clients may contact Ms. Voight at the phone number listed on the cover of this Brochure Supplement, to obtain a copy of SIMA Wealth's code of ethics.

Additionally, SIMA Wealth is subject to regulatory oversight by various agencies. These agencies require registration by SIMA Wealth and certain employees. As a registered entity, SIMA Wealth is subject to examinations by regulators, which may be announced or unannounced. SIMA Wealth is required to periodically update the information provided to these agencies and to provide various reports regarding firm business and assets under management.

Shengyi Mao

Investment Adviser Representative
CRD# 7833568

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Form ADV Part 2B Brochure

This Brochure Supplement provides information about Shengyi Mao that supplements the SIMA Wealth Partners, LLC (hereinafter "SIMA Wealth") Brochure. You should have received a copy of that Brochure. Please contact us at (804) 285-5700 if you did not receive SIMA Wealth's Brochure or if you have any questions about the contents of this supplement.

Additional information about Shengyi Mao is available on the SEC's website at www.adviserinfo.sec.gov. Ms.

Educational Background and Business Experience - Item 2

Shengyi Mao
Year of Birth: 1999
Formal Education after High School:

- Waseda University, Bachelor's Degree, international/Global Studies, 2022

Business Background for the last 5 Years:

- SIMA Retirement Solutions, LLC, Investment Adviser Representative, 01/2024 to Present.
- SIMA Wealth Partners, LLC, Investment Adviser Representative, 11/2023 to Present.
- SIMA Financial Group, Inc., Client Services Specialist, 05/2023 to Present.
- JP Morgan & Chase, Associate Banker, 05/2022 to 05/2023
- Trader Joe's, Crew, 11/2020 to 01/2022
- Waseda University, Student, 08/2018 to 01/2022

Disciplinary Information - Item 3

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Ms. Mao and SIMA Wealth. Ms. Mao has not been involved in any reportable disciplinary events.

Other Business Activities - Item 4

We are also affiliated through common control and ownership with SIMA Retirement Solutions, LLC. (SIMA Retirement), a Virginia based, registered investment adviser. Ms. Mao is dually registered as an investment adviser representative with SIMA Retirement. She may recommend that plan sponsors utilize retirement plan consulting services offered by SIMA Retirement. SIMA Wealth will not directly share in the compensation received by SIMA Retirement, but Ms. Mao may be compensated in her capacity as an investment adviser representative of SIMA Retirement. She may have a financial incentive to recommend the services of SIMA Retirement. However, you are not required to use the services of SIMA Retirement. Ms. Mao currently devotes approximately 50% of her time to her advisory activities with SIMA Retirement.

Additional Compensation – Item 5

Apart from the additional compensation listed under Item 4, Ms. Mao does not receive additional compensation or economic benefits from third party sources in connection to her advisory activities.

Supervision - Item 6

Ms. Mao is an investment adviser representative of SIMA Wealth. In this role, Ms. Mao is responsible for the monitoring of client portfolios for investment objectives and other supervisory reviews. Ms. Mao is supervised by Mark A. Jones, CPA, AIF, the Managing Member of SIMA Wealth. Mr. Jones can be reached at (804) 285-5700.

SIMA Wealth has implemented a Code of Ethics and an internal compliance program that guides each Associated Person in meeting their fiduciary obligations to clients. Ms. Mao adheres to SIMA Wealth's code of ethics and compliance manual as mandated. Clients may contact Ms. Mao at the phone number listed on the cover of this Brochure Supplement, to obtain a copy of SIMA Wealth's code of ethics.

Additionally, SIMA Wealth is subject to regulatory oversight by various agencies. These agencies require registration by SIMA Wealth and certain employees. As a registered entity, SIMA Wealth is subject to examinations by regulators, which may be announced or unannounced. SIMA Wealth is required to periodically update the information provided to these agencies and to provide various reports regarding firm business and assets under management.

Colton Jones

Investment Adviser Representative
CRD# 7971607

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Form ADV Part 2B Brochure

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Additional information about Colton Jones is available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience - Item 2

Colton Jones
Year of Birth: 1999
Formal Education after High School:

- Virginia Polytechnic Institute and State University, Bachelor of Science Degree, Finance with Real Estate Minor, 2021

Business Background for the last 5 Years:

- SIMA Retirement Solutions, LLC, Investment Adviser Representative, 08/2024 to Present
- SIMA Wealth Partners, LLC, Investment Adviser Representative, 08/2024 to Present
- SIMA Financial Group, Inc., Operations Specialist, 12/2023 to Present
- Teamworks, LLC, Customer Support Specialist, 04/2023 to 12/2023
- ARMS Software, LLC, Customer Support Specialist, 06/2021 to 04/2023
- Virginia Polytechnic Institute and State University, Student, 08/2017 to 06/2021

Disciplinary Information - Item 3

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Mr. Jones and SIMA Wealth. Mr. Jones has not been involved in any reportable disciplinary events.

Other Business Activities - Item 4

We are also affiliated through common control and ownership with SIMA Retirement Solutions, LLC. (SIMA Retirement), a Virginia based, registered investment adviser. Mr. Jones is dually registered as an investment adviser representative with SIMA Retirement. He may recommend that plan sponsors utilize retirement plan consulting services offered by SIMA Retirement. SIMA Wealth will not directly share in the compensation received by SIMA Retirement, but Mr. Jones may be compensated in his capacity as an investment adviser representative of SIMA Retirement. He may have a financial incentive to recommend the services of SIMA Retirement. However, you are not required to use the services of SIMA Retirement. Mr. Jones currently devotes approximately 90% of his time to his advisory activities with SIMA Wealth Partners, LLC; 10% of his time to SIMA Retirement Solutions.

Additional Compensation – Item 5

Apart from the additional compensation listed under Item 4, Mr. Jones does not receive additional compensation or economic benefits from third party sources in connection to his advisory activities.

Supervision - Item 6

Mr. Jones is an investment adviser representative of SIMA Wealth. In this role, Mr. Jones is responsible for the monitoring of client portfolios for investment objectives and other supervisory reviews. Mr. Jones is supervised by Mark A. Jones, CPA, AIF, the Managing Member of SIMA Wealth. Mr. Jones can be reached at (804) 285-5700.

SIMA Wealth has implemented a Code of Ethics and an internal compliance program that guides each Associated Person in meeting their fiduciary obligations to clients. Mr. Jones adheres to SIMA Wealth's code of ethics and compliance manual as mandated. Clients may contact Mr. Jones at the phone number listed on the cover of this Brochure Supplement, to obtain a copy of SIMA Wealth's code of ethics.

Additionally, SIMA Wealth is subject to regulatory oversight by various agencies. These agencies require registration by SIMA Wealth and certain employees. As a registered entity, SIMA Wealth is subject to examinations by regulators, which may be announced or unannounced. SIMA Wealth is required to periodically update the information provided to these agencies and to provide various reports regarding firm business and assets under management.