

Coombs Wealth Advisory, LLC

Form ADV Part 2A – Disclosure Brochure

Effective: October 01, 2024

This Form ADV 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of Coombs Wealth Advisory, LLC (“Coombs Wealth” or the “Advisor”). If you have any questions about the contents of this Disclosure Brochure, please contact the Advisor at (610) 825-3848.

Coombs Wealth is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). The information in this Disclosure Brochure has not been approved or verified by the U.S. Securities and Exchange Commission (“SEC”) or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information through Coombs Wealth to assist you in determining whether to retain the Advisor.

Additional information about Coombs Wealth and its Advisory Persons is available on the SEC’s website at www.adviserinfo.sec.gov through a search with the Advisor’s firm name or CRD #281132.

Item 2 – Material Changes

Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about the Advisory Persons of Coombs Wealth. For convenience, the Advisor has combined these documents into a single disclosure document.

Coombs Wealth believes that communication and transparency are the foundation of its relationship with Clients and will continually strive to provide its Clients with complete and accurate information at all times. Coombs Wealth encourages all current and prospective Clients to read this Disclosure Brochure and discuss any questions you may have with the Advisor.

Material Changes

The following material changes have been made to this Disclosure Brochure since the last filing:

- The Advisor has updated its range of fees. Please see Item 5 for additional details.
- The Advisor is transitioning as a state registered advisor to an advisor registered with the U.S. Securities and Exchange Commission ("SEC").
- The Advisor now utilizes Independent Managers, and has updated Item 4, Item 5, and Item 10 respectively.
- The Advisor now offers an additional fee structure for their Wealth Management services, and has updated Item 4 and Item 5 respectively.

Future Changes

From time to time, the Advisor may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations or routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov through a search with the Advisor's firm name or CRD #281132. You may also request a copy of this Disclosure Brochure at any time by contacting the Advisor at (610) 825-3848.

Coombs Wealth Advisory, LLC

490 Norristown Road, Suite 250, Blue Bell, PA 19422
Phone: (610) 825-3848 * Fax: (610) 825-3529

Item 3 – Table of Contents

Item 1 – Cover Page	1
Item 2 – Material Changes	2
Item 3 – Table of Contents	3
Item 4 – Advisory Services	4
A. Firm Information	4
B. Advisory Services Offered	4
C. Client Account Management	6
D. Wrap Fee Programs	6
E. Assets Under Management	6
Item 5 – Fees and Compensation	6
A. Fees for Advisory Services	6
B. Fee Billing	7
C. Other Fees and Expenses	8
D. Advance Payment of Fees and Termination	8
E. Compensation for Sales of Securities	8
Item 6 – Performance-Based Fees and Side-By-Side Management	8
Item 7 – Types of Clients	9
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss	9
A. Methods of Analysis	9
B. Risk of Loss	9
Item 9 – Disciplinary Information	10
Item 10 – Other Financial Industry Activities and Affiliations	10
Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	10
A. Code of Ethics	10
B. Personal Trading with Material Interest	11
C. Personal Trading in Same Securities as Clients	11
D. Personal Trading at Same Time as Client	11
Item 12 – Brokerage Practices	11
A. Recommendation of Custodian[s]	11
B. Aggregating and Allocating Trades	12
Item 13 – Review of Accounts	12
A. Frequency of Reviews	12
B. Causes for Reviews	12
C. Review Reports	12
Item 14 – Client Referrals and Other Compensation	12
A. Compensation Received by Coombs Wealth	13
B. Compensation for Client Referrals	13
Item 15 – Custody	13
Item 16 – Investment Discretion	13
Item 17 – Voting Client Securities	14
Item 18 – Financial Information	14

Coombs Wealth Advisory, LLC

490 Norristown Road, Suite 250, Blue Bell, PA 19422
Phone: (610) 825-3848 * Fax: (610) 825-3529

Item 4 – Advisory Services

A. Firm Information

Coombs Wealth Advisory, LLC (“Coombs Wealth” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”), which is organized as a Limited Liability Company (“LLC”) under the laws of Pennsylvania. Coombs Wealth was founded in August 2015, and is owned and operated by Brian C. Coombs (Managing Partner and Chief Compliance Officer) and Lonnie A. Coombs (Managing Partner). This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by Coombs Wealth.

B. Advisory Services Offered

Coombs Wealth offers investment advisory services to individuals, high net worth individuals, trusts, estates and businesses and other corporations (each referred to as a “Client”).

The Advisor acts as a fiduciary to Clients, as defined under the applicable laws and regulations. As such, each recommendation made as part of the advisory services are based on the belief that the recommendation is in the Client's best interest. The Advisor's fiduciary commitment to each Client is further described in the Advisor's Code of Ethics. For more information regarding the Advisor's Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

Wealth Management Services

Coombs Wealth provides Clients with wealth management services, which generally includes discretionary management of investment portfolios in connection with a broad range of comprehensive financial planning services. Coombs Wealth offers two types of wealth management solutions for its Clients based on the size and complexity of the relationship. Both wealth management services include financial planning and investment management services as described below. Wealth Management Advisory (“WMA”) services are provided based a percentage of assets under management with Coombs Wealth pursuant to the terms of the advisory agreement. Please see Item 5.A for fees. Wealth Management Fixed Fee Advisory (“WMFF”) services are generally offered when it is more appropriate to incorporate investment management services on a fixed-fee basis, which is detailed in a Wealth Management Fixed Fee Advisory Agreement.

Investment Management Services – Coombs Wealth provides customized investment advisory solutions for its Clients. This is achieved through continuous personal Client contact and interaction while, providing discretionary and non-discretionary investment management, and financial planning services. Coombs Wealth works with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create a portfolio strategy. Coombs Wealth will then construct a portfolio, consisting of diversified mutual funds and/or exchange-traded funds (“ETFs”) to achieve the Client's investment goals. The Advisor may also utilize individual stocks, individual bonds and other types of investments, as appropriate, to meet the needs of particular Clients.

Coombs Wealth's investment approach is primarily long-term focused, but the Advisor may buy, sell or re-allocate positions that have been held for less than one year to meet the objectives of the Client or due to market conditions. Coombs Wealth typically seeks tax efficiency with respect to its investment strategies. Coombs Wealth will construct, implement and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to acceptance by the Advisor.

Coombs Wealth evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. Coombs Wealth may recommend, on occasion, redistributing investment allocations to diversify the portfolio. Coombs Wealth may recommend specific positions to increase sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement, which may adversely affect the portfolio. Coombs Wealth may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client's risk tolerance.

At no time will Coombs Wealth accept or maintain custody of a Client's funds or securities, except for the limited authority as outlined in Item 15 – Custody. All Client assets will be managed within the designated account[s] at the Custodian, pursuant to the terms of the Client investment management agreement. Please see Item 12 – Brokerage Practices.

Retirement Accounts – When deemed to be in the Client's best interest, the Advisor will provide investment advice to a Client regarding a distribution from an ERISA sponsored plan or to roll over the assets to an Individual Retirement Accounts ("IRAs"), or recommend a similar transaction including rollovers from one ERISA sponsored Plan to another, one IRA to another IRA, or from one type of account to another account (e.g. commission-based account to fee-based account). In such instances, the Advisor will serve as an investment fiduciary as that term is defined under The Employee Retirement Income Security Act of 1974 ("ERISA") and/or the Internal Revenue Code ("IRC"), as applicable, which are laws governing retirement accounts. Such a recommendation creates a conflict of interest if the Advisor will earn a new (or increase its current) advisory fee as a result of the transaction. No client is under any obligation to roll over a retirement account to an account managed by the Advisor.

Financial Planning Services

Coombs Wealth will typically provide a variety of ongoing financial planning services to Clients, either as a component of its wealth management services or pursuant to a written financial planning agreement. Services are offered in several areas of a Client's financial situation, depending on their goals and objectives.

Generally, such financial planning services will involve preparing a formal plan based on the Client's financial goals and objectives. Planning encompasses one or more areas of need, including, but not limited to investment planning, retirement planning, personal savings, education savings and other areas of a Client's financial situation.

A financial plan developed for to the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs, commence or alter retirement savings, establish education savings and/or charitable giving programs.

Coombs Wealth may also refer Clients to an accountant, attorney or other specialists, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of Client's financial situation, observations, and recommendations. Plans are typically completed within six months of contract date, assuming all information and documents requested are provided promptly.

Financial planning recommendations pose a conflict between the interests of the Advisor and the interests of the Client. For example, the Advisor has an incentive to recommend the Clients engage the Advisor for investment management services or to increase the level of investment assets with the Advisor, as it would increase the amount of advisory fees paid to the Advisor. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to implement the transaction through the Advisor.

Independent Managers

Coombs Wealth will recommend that Clients utilize one or more unaffiliated investment managers or investment platforms (collectively "Independent Managers") for all or a portion of a Client's investment portfolio, based on the Client's needs and objectives. In certain instances, the Client may be required to authorize and enter into an investment management agreement with the Independent Manager[s] that defines the terms in which the Independent Manager[s] will provide its services. The Advisor will perform initial and ongoing oversight and due diligence over each Independent Manager to ensure the strategy remains aligned with Clients investment objectives and overall best interests. The Advisor will also assist the Client in the development of the initial policy recommendations and managing the ongoing Client relationship. The Client, prior to entering into an agreement with an Independent Manager, will be provided with the Independent Manager's Form ADV Part 2A - Disclosure Brochure (or a brochure that makes the appropriate disclosures).

Coombs Wealth Advisory, LLC

490 Norristown Road, Suite 250, Blue Bell, PA 19422
Phone: (610) 825-3848 * Fax: (610) 825-3529

C. Client Account Management

Prior to engaging Coombs Wealth to provide investment advisory services, each Client is required to enter into a wealth management agreement with the Advisor that defines the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Strategy – Coombs Wealth in connection with the Client, will develop a strategy that seeks to achieve the Client's investment goals and objectives.
- Asset Allocation – Coombs Wealth will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance for risk for each Client.
- Portfolio Construction – Coombs Wealth will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – Coombs Wealth will provide investment management and ongoing oversight of the Client's investment portfolio.

D. Wrap Fee Programs

Coombs Wealth does not manage or place Client assets into a wrap fee program. Investment management services are provided directly by Coombs Wealth.

E. Assets Under Management

As of February 20, 2024, Coombs Wealth manages \$ 145,253,997 in Client assets, \$133,364,948 of which are managed on a discretionary basis, and \$11,889,049 on a non-discretionary basis. Clients may request more current information at any time by contacting the Advisor.

Item 5 – Fees and Compensation

The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client shall enter into an agreement with the Advisor that detail the responsibilities of Coombs Wealth and the Client.

A. Fees for Advisory Services

Wealth Management Advisory

Wealth Management Advisory (WMA) fees are paid at the end of each calendar quarter, pursuant to the terms of the wealth management agreement. Wealth management fees range from 0.50% to 0.75%, depending on the size, complexity and overall relationship with the Client. Relationships with smaller accounts, multiple objectives, specific reporting requirements, portfolio restrictions and other complexities may be charged a higher fee. The wealth management fee in the first quarter of service is prorated from the inception date of the account[s] to the end of the first quarter. Fees may be negotiable at the sole discretion of the Advisor. The Client's fees will take into consideration the aggregate assets under management with the Advisor. All securities held in accounts managed by Coombs Wealth will be independently valued by the Custodian. The Advisor will conduct periodic reviews of the Custodian's valuations.

The Advisor's fee is exclusive of, and in addition to, brokerage fees, transaction fees, and other related costs and expenses, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs.

Wealth Management Fixed Fee Advisory

Wealth Management Fixed Fee Advisory (WMFF) fees are paid quarterly at the end of each calendar quarter, pursuant to the terms of the wealth management fixed fee agreement. The annual fee is on a fixed-fee basis and is non-negotiable. Coombs Wealth at its discretion, may charge a different fee based on several factors, including: the complexity of the services to be provided, the level of assets to be managed, and the overall relationship with the Advisor. Relationships with multiple objectives, specific reporting requirements, portfolio restrictions and other complexities may be charged a higher or lower fee.

Coombs Wealth Advisory, LLC

490 Norristown Road, Suite 250, Blue Bell, PA 19422
Phone: (610) 825-3848 * Fax: (610) 825-3529

Additional Information on Fees – Coombs Wealth believes that the charges and fees within its programs are competitive with alternative programs available through other firms offering a similar range of services. However, lower fees for comparable services may be available from other sources.

Financial Planning Services

Coombs Wealth offers financial planning services for a fixed fee ranging from \$1,000 to \$2,500. Fees may be negotiable based on the nature and complexity of the services to be provided and the overall relationship with the Advisor. An estimate for the total costs will be provided to the Client prior to engaging for these services. Clients may also engage for planning services through a perpetual engagement. In such instances, fees are billed quarterly, at the end of each calendar quarter. If a client engages the Advisor for wealth management services, Coombs Wealth may offset all or a portion of its fees for those services based upon the amount paid for wealth management services.

Independent Managers

As noted in Item 4, the Advisor will implement all or a portion of a Client's investment portfolio utilizing one or more Independent Managers. To eliminate any conflict of interest, the Advisor does not earn any compensation from an Independent Manager. The Advisor will only earn its investment advisory fee as described above. Independent Managers typically do not offer any fee discounts but may have a breakpoint schedule which will reduce the fee with an increased level of assets placed under management with an Independent Manager. The terms of such fee arrangements are included in the Independent Manager's disclosure brochure and applicable contract[s] with the Independent Manager. The total blended fee, including the Advisor's fee and the Independent Manager's fee, will not exceed 1.00% annually.

B. Fee Billing

Wealth Management Advisory

WMA fees will be calculated by the Advisor and deducted from the Client's account[s] at the Custodian. The Advisor shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client's account[s] at the respective quarter-end date. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management with Coombs Wealth at the end of each quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the wealth management fee. In addition, the Advisor will provide the Client a report itemizing the fee, including the calculation period covered by the fee, the account value and the methodology used to calculate the fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the Custodian's brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting advisory fees to be deducted by Coombs Wealth directly from their accounts held by the Custodian as part of the wealth management agreement and separate account forms provided by the Custodian.

Wealth Management Fixed Fee Advisory

WMFF fees are calculated by dividing the annual fixed fee by 4. At the end of each quarter, the fixed fee for the Client relationship is apportioned to each of the Client's accounts based on the assets in each account as compared to the total assets of the Client. Clients provide written authorization permitting advisory fees to be deducted by Coombs Wealth to be paid directly from their account[s] held by the Custodian as part of the advisory agreement and separate account forms provided by the Custodian.

Use of Independent Managers

For Client accounts implemented through an Independent Manager, the Client's overall fees may include Coombs Wealth investment advisory fee (as noted above) plus investment management fees and/or platform fees charged by the Independent Manager[s], as applicable. In certain instances, the Independent Manager or the Advisor may assume responsibility for calculating the Client's fees and deduct all fees from the Client's account[s].

Financial Planning Services

Financial planning fees are invoiced up to fifty percent (50%) of the expected costs of the engagement upon execution of the financial planning agreement. The balance shall be invoiced upon completion of the agreed upon deliverable[s]. The Advisor will not collect fees that are greater than \$500 if the services will be for six months or more in the future.

Coombs Wealth Advisory, LLC

490 Norristown Road, Suite 250, Blue Bell, PA 19422
Phone: (610) 825-3848 * Fax: (610) 825-3529

C. Other Fees and Expenses

Clients may incur certain fees or charges imposed by third parties, other than Coombs Wealth, in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all custody and securities execution fees charged by the Custodian, if applicable. The Advisor's recommended custodian does not charge securities transaction fees for ETF and equity trades in Client accounts, but does charge for mutual funds and other types of investments. The investment advisory fee charged by Coombs Wealth is separate and distinct from these custody and execution fees.

In addition, all fees paid to Coombs Wealth for investment advisory services are separate and distinct from the expenses charged by mutual funds and ETFs to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client may be able to invest in these products directly, without the services of Coombs Wealth, but would not receive the services provided by Coombs Wealth which are designed, among other things, to assist the Client in determining which products or services are most appropriate for each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by Coombs Wealth to fully understand the total fees to be paid. Please refer to Item 12 – Brokerage Practices for additional information.

D. Advance Payment of Fees and Termination

Wealth Management Services

Coombs Wealth is compensated for its wealth management services at the end of the quarter, after services are rendered. Either party may terminate the wealth management agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the wealth management agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. The Client's wealth management agreement with the Advisor is non-transferable without the Client's prior consent.

Financial Planning Services

Coombs Wealth requires an advance deposit as described above. For ongoing financial planning engagements, the Advisor is compensated at the end of the quarter in which services are rendered. Either party may terminate the financial planning agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the financial planning agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Upon termination, the Client shall be billed for the percentage of the engagement scope completed by the Advisor. For ongoing planning engagements, fees are calculated up to and including the effective date of termination. Additionally, the Advisor will refund any unearned, prepaid advisory fees. The Client's financial planning agreement with the Advisor is non-transferable without the Client's prior consent.

Independent Managers

In the event that the Advisor has determined that an Independent Manager is no longer in the Client's best interest or a Client should wish to terminate their relationship with the Independent Manager, the terms for the termination will be set forth in the respective agreements between the Client or the Advisor and the Independent Manager. Coombs Wealth will assist the Client with the termination and transition as appropriate.

E. Compensation for Sales of Securities

Coombs Wealth does not buy or sell securities and does not receive any compensation for securities transactions in any Client account, other than the wealth management fees noted above.

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

Coombs Wealth Advisory, LLC

490 Norristown Road, Suite 250, Blue Bell, PA 19422
Phone: (610) 825-3848 * Fax: (610) 825-3529

Coombs Wealth does not charge performance-based fees for its investment advisory services. The fees charged by Coombs Wealth are as described in Item 5 above and are not based upon the capital appreciation of the funds or securities held by any Client.

Coombs Wealth does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

Item 7 – Types of Clients

Coombs Wealth provides investment advisory services to individuals, high net worth individuals, trusts, estates and corporations and other businesses. Coombs Wealth generally does not impose a minimum account size for establishing a relationship.

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

A. Methods of Analysis

Coombs Wealth primarily employs fundamental analysis methods in developing investment strategies for its Clients. Research and analysis from Coombs Wealth is derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

Fundamental analysis utilizes economic and business indicators as investment selection criteria. These criteria are generally ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

As noted above, Coombs Wealth generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. Coombs Wealth will typically hold all or a portion of a security for more than a year, but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, Coombs Wealth may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector or asset class.

B. Risk of Loss

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. Coombs Wealth will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

While the methods of analysis help the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in these methods of analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account[s]. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. Following are some of the risks associated with the Advisor's investment approach:

Market Risks

The value of a Client's holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad. This risk is linked to the performance of the overall financial markets.

ETF Risks

The performance of ETFs is subject to market risk, including the possible loss of principal. The value of the ETFs will fluctuate with the value of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs has a large bid-ask spread and low volume. Authorized participants in an ETF may change at any time; this may result in change to the liquidity and the ability to redeem the ETF as the authorized participants control the number of shares of the ETF. The value of an ETF fluctuates based upon the market movements and may disassociate from the index being tracked or from the value of the underlying investments. An ETF purchased or sold at one point in the day may have a different value than the same ETF purchased or sold a short time later.

Mutual Fund Risks

The performance of mutual funds is subject to market risk, including the possible loss of principal. The value of the mutual funds will fluctuate with the value of the underlying securities that make up the funds. The value of a mutual fund is typically set daily therefore a mutual fund purchased at one point in the day will typically have the same value as a mutual fund purchased later that same day.

Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.

Item 9 – Disciplinary Information

There are no legal, regulatory or disciplinary events involving Coombs Wealth or its management persons. Coombs Wealth and its Advisory Persons value the trust you place in the Advisor. As the Advisor advise all Clients, Coombs Wealth encourages Clients to perform the requisite due diligence on any advisor or service provider with whom you partner. The Advisor's backgrounds are available on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov. You may search with the Advisor's firm name or our CRD# 281132.

Item 10 – Other Financial Industry Activities and Affiliations

Coombs & Company, LLC

The Advisor is affiliated through common control and ownership with Coombs & Company, LLC ("Coombs & Company") a tax and accounting firm. The Advisor may refer Clients to utilize the services of Coombs & Company. Clients are advised that these services may be separate and distinct from the advisory services offered by the Advisor and that the receipt of additional compensation by management persons poses a conflict of interest. Clients are not obligated to engage Coombs & Company for these tax preparation and accounting services in order to maintain an advisory relationship with the Advisor.

Independent Managers

As noted in Item 4, the Advisor may implement all or a portion of a Client's investment portfolio with one or more Independent Managers. The Advisor does not receive any compensation nor does this present a material conflict of interest. The Advisor will only earn its investment advisory fee as described in Item 5.A.

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

A. Code of Ethics

Coombs Wealth has implemented a Code of Ethics (the "Code") that defines the Advisor's fiduciary commitment to each Client. This Code applies to all persons associated with Coombs Wealth. This Code applies to all persons associated with Coombs Wealth ("Supervised Persons"). The Code was developed to provide general ethical guidelines and specific instructions regarding the Advisor's duties to the Client. Coombs Wealth and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of Coombs Wealth associates to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code covers a range of topics that address employee ethics and conflicts of interest. To request a copy of the Code, please contact us at (610) 825-3848.

B. Personal Trading with Material Interest

Coombs Wealth allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Coombs Wealth does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund, or advise an investment company. Coombs Wealth does not have a material interest in any securities traded in Client accounts.

C. Personal Trading in Same Securities as Clients

Coombs Wealth allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities the Advisor recommend (purchase or sell) to Client's presents a potential conflict of interest that, as fiduciaries, the Advisor must disclose to Clients and mitigate through policies and procedures. As noted above, the Advisor has adopted a Code, which addresses insider trading (material non-public information controls) and personal securities reporting procedures. When trading for personal accounts, Supervised Persons of Coombs Wealth have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can potentially be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by Coombs Wealth requiring reporting of personal securities trades by its Supervised Persons for review by the CCO. The Advisor has also adopted written policies and procedures to detect the misuse of material, non-public information.

D. Personal Trading at Same Time as Client

While Coombs Wealth allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterwards. **At no time will Coombs Wealth, or any associated person of Coombs Wealth, transact in any security to the detriment of any Client.**

Item 12 – Brokerage Practices

A. Recommendation of Custodian[s]

Coombs Wealth does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The Client will engage the broker-dealer/custodian (herein the "Custodian") to safeguard Client assets and authorize Coombs Wealth to direct trades to the Custodian as agreed upon in the wealth management agreement. Further, Coombs Wealth does not have the discretionary authority to negotiate commissions on behalf of Clients on a trade-by-trade basis.

Where Coombs Wealth does not exercise discretion over the selection of the Custodian, it may recommend the Custodian[s] to Clients for custody and execution services. Clients are not obligated to use the Custodian recommended by the Advisor and will not incur any extra fee or cost associated with using a Custodian not recommended by Coombs Wealth. However, the Advisor may be limited in the services it can provide if the recommended Custodian is not engaged. Coombs Wealth may recommend a Custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, its reputation and/or the location of the Custodian's offices. Coombs Wealth does not receive research services, other products, or compensation as a result of recommending a particular broker that may result in the Client paying higher commissions than those obtainable through other brokers. Coombs Wealth will generally recommend that Clients establish their account[s] at Charles Schwab & Co., Inc. ("Schwab"), a FINRA-registered broker-dealer and member SIPC. Schwab will serve as the Client's "qualified custodian". Coombs Wealth maintains an institutional

Coombs Wealth Advisory, LLC

490 Norristown Road, Suite 250, Blue Bell, PA 19422
Phone: (610) 825-3848 * Fax: (610) 825-3529

relationship with Schwab, whereby the Advisor receives economic benefits from Schwab. Please see Item 14 below.

Following are additional details regarding the brokerage practices of the Advisor:

1. Soft Dollars - Soft dollars are revenue programs offered by broker-dealers/custodians whereby an advisor enters into an agreement to place security trades with a broker-dealer/custodian in exchange for research and other services. **Coombs Wealth does not participate in soft dollar programs sponsored or offered by any broker-dealer. However, the Advisor receives certain economic benefits from the Custodian. Please see Item 14 below.**

2. Brokerage Referrals - Coombs Wealth does not receive any compensation from any third party in connection with the recommendation for establishing a brokerage account.

3. Directed Brokerage - All Clients are serviced on a “directed brokerage basis”, where Coombs Wealth will place trades within the established account[s] at the Custodian designated by the Client. Further, all Client accounts are traded within their respective brokerage account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor’s own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client’s account[s]). Coombs Wealth will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the Custodian.

B. Aggregating and Allocating Trades

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the Custodian. Coombs Wealth will execute its transactions through the Custodian as directed by the Client. Coombs Wealth may aggregate orders in a block trade or trades when securities are purchased or sold through the Custodian for multiple (discretionary) accounts. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage particular Clients’ accounts.

Item 13 – Review of Accounts

A. Frequency of Reviews

Securities in Client accounts are monitored on a regular and continuous basis by one or both Partners of Coombs Wealth. Formal reviews are generally conducted at least annually or more frequently depending on the needs of the Client.

B. Causes for Reviews

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more or less frequently at the Client’s request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client’s financial situation, and/or large deposits or withdrawals in the Client’s account[s]. The Client is encouraged to notify Coombs Wealth if changes occur in the Client’s personal financial situation that might adversely affect the Client’s investment plan. Additional reviews may be triggered by material market, economic or political events.

C. Review Reports

The Client will receive brokerage statements no less than quarterly from the Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian’s website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client’s account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

Item 14 – Client Referrals and Other Compensation

Coombs Wealth Advisory, LLC

490 Norristown Road, Suite 250, Blue Bell, PA 19422
Phone: (610) 825-3848 * Fax: (610) 825-3529

A. Compensation Received by Coombs Wealth

Coombs Wealth is a fee-based advisory firm, who, that is compensated solely by its Client and not from any investment product. Coombs Wealth does not receive commissions or other compensation from product sponsors, broker-dealers or any un-related third party. Coombs Wealth may refer Clients to various unaffiliated, non-advisory professionals (e.g. attorneys, accountants, estate planners) to provide certain financial services necessary to meet the goals of its Clients. Likewise, Coombs Wealth may receive non-compensated referrals of new Clients from various third-parties.

Participation in Institutional Advisor Platform

Coombs Wealth has established an institutional relationship with Schwab through its “Schwab Advisor Services” unit, a division of Schwab dedicated to serving independent advisory firms like Coombs Wealth. As a registered investment advisor participating on the Schwab Advisor Services platform, Coombs Wealth receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at Schwab. Services provided by Schwab Advisor Services benefit the Advisor and many, but not all services provided by Schwab will benefit Clients. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a Custodian creates a conflict of interest since these benefits may influence the Advisor's recommendation of this Custodian over one that does not furnish similar software, systems support, or services.

Services that Benefit the Client – Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of Client's funds and securities. Through Schwab, the Advisor may be able to access certain investments and asset classes that the Client would not be able to obtain directly or through other sources. Further, the Advisor may be able to invest in certain mutual funds and other investments without having to adhere to investment minimums that might be required if the Client were to directly access the investments.

Services that May Indirectly Benefit the Client – Schwab provides participating advisors with access to technology, research, discounts and other services. In addition, the Advisor receives duplicate statements for Client accounts, the ability to deduct advisory fees, trading tools, and back office support services as part of its relationship with Schwab. These services are intended to assist the Advisor in effectively managing accounts for its Clients, but may not directly benefit all Clients.

Services that May Only Benefit the Advisor – Schwab also offers other services to Coombs Wealth that may not benefit the Client, including: educational conferences and events, consulting services and discounts for various service providers. Access to these services creates a financial incentive for the Advisor to recommend Schwab, which results in a conflict of interest. Coombs Wealth believes, however, that the selection of Schwab as Custodian is in the best interests of its Clients.

B. Compensation for Client Referrals

Coombs Wealth does not compensate, either directly or indirectly, any persons who are not supervised persons for Client referrals.

Item 15 – Custody

Coombs Wealth does not accept or maintain custody of any Client accounts, except for the authorized deduction of the Advisor's fee. All Clients must place their assets with a “qualified custodian”. Clients are required to engage the Custodian to retain their funds and securities and direct Coombs Wealth to utilize that Custodian for the Client's security transactions. Clients should review statements provided by the Custodian and compare to any reports provided by Coombs Wealth to ensure accuracy, as the Custodian does not perform this review. For more information about custodians and brokerage practices, see Item 12 – Brokerage Practices.

Item 16 – Investment Discretion

Coombs Wealth typically has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be

subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by Coombs Wealth. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an wealth management agreement containing all applicable limitations to such authority. All discretionary trades made by Coombs Wealth will be in accordance with each Client's investment objectives and goals.

Item 17 – Voting Client Securities

Coombs Wealth does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

Item 18 – Financial Information

Neither Coombs Wealth, nor its management, have any adverse financial situations that would reasonably impair the ability of Coombs Wealth to meet all obligations to its Clients. Neither Coombs Wealth, nor any of its Advisory Persons, have been subject to a bankruptcy or financial compromise. Coombs Wealth is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect fees of \$1,200 or more for services to be performed six months or more in advance.

Coombs Wealth Advisory, LLC

490 Norristown Road, Suite 250, Blue Bell, PA 19422
Phone: (610) 825-3848 * Fax: (610) 825-3529

Form ADV Part 2B – Brochure Supplement

for

Brian C. Coombs, CFA, CPA®
Managing Partner and Chief Compliance Officer

Effective: March 8, 2024

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Brian C. Coombs, CFA, CPA®, (CRD# **5687480**) in addition to the information contained in the Coombs Wealth Advisory, LLC (“Coombs Wealth” or the “Advisor”) (CRD # 281132) Disclosure Brochure. If the Client has not received a copy of the Disclosure Brochure or if the Client has any questions about the contents of the Coombs Wealth Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (610) 825-3848.

Additional information about Mr. Coombs is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching his full name or Individual CRD# 5687480.

Coombs Wealth Advisory, LLC

490 Norristown Road, Suite 250, Blue Bell, PA 19422
Phone: (610) 825-3848 * Fax: (610) 825-3529

Item 2 – Educational Background and Business Experience

Brian C. Coombs, CFA, CPA®, born in 1987, is dedicated to advising Clients of Coombs Wealth in his role as a Managing Partner and the Chief Compliance Officer. Mr. Coombs earned a Bachelor of Science in Finance from the University of Notre Dame in 2009. Additional information regarding Mr. Coombs's employment history is included below.

Employment History:

Managing Partner and Chief Compliance Officer, Coombs Wealth Advisory, LLC	08/2015 to Present
Partner and Accountant, Coombs & Company, LLC	09/2014 to Present
Investment Analyst, Vanguard	08/2009 to 08/2014

Chartered Financial Analyst ("CFA")

The Chartered Financial Analyst ("CFA") charter is a professional designation established in 1962 and awarded by CFA Institute. To earn the CFA charter, candidates must pass three sequential, six-hour examinations over two to four years. The three levels of the CFA Program test a wide range of investment topics, including ethical and professional standards, fixed-income analysis, alternative and derivative investments, and portfolio management and wealth planning. In addition, CFA charterholders must have at least four years of acceptable professional experience in the investment decision-making process and must commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

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 majority of state boards of accountancy have adopted the AICPA's® Code of Professional Conduct within their state accountancy laws or have created their own.

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Coombs. Mr. Coombs has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Coombs.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Coombs.***

However, we do encourage you to independently view the background of Mr. Coombs on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 5687480.

Item 4 – Other Business Activities

Coombs & Company, LLC

Mr. Coombs also serves as a partner of Coombs & Company, LLC (“Coombs & Company”) a tax and accounting firm under common control with the Advisor. Mr. Coombs may refer Clients to utilize the services of Coombs & Company. Clients are advised that these services may be separate and distinct from the advisory services offered by the Advisor and that the receipt of additional compensation by Mr. Coombs poses a conflict of interest. Clients are not obligated to engage Coombs & Company for these tax preparation and accounting services in order to maintain an advisory relationship with the Advisor.

Item 5 – Additional Compensation

Mr. Coombs has additional business activities where compensation is received that are detailed in Item 4 above.

Item 6 – Supervision

Mr. Coombs serves as a Managing Partner and the Chief Compliance Officer of Coombs Wealth. Mr. Coombs can be reached at (610) 825-3848.

Coombs Wealth has implemented a Code of Ethics, an internal compliance document that guide each Supervised Person in meeting their fiduciary obligations to Clients of Coombs Wealth. Further, Coombs Wealth is subject to regulatory oversight by various agencies. These agencies require registration by Coombs Wealth and its Supervised Persons. As a registered entity, Coombs Wealth is subject to examinations by regulators, which may be announced or unannounced. Coombs Wealth is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Coombs Wealth Advisory, LLC

490 Norristown Road, Suite 250, Blue Bell, PA 19422
Phone: (610) 825-3848 * Fax: (610) 825-3529

Form ADV Part 2B – Brochure Supplement

for

**Lonnie A. Coombs, CPA®
Managing Partner**

Effective: March 8, 2024

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Lonnie A. Coombs, CPA®, (CRD# **6543572**) in addition to the information contained in the Coombs Wealth Advisory, LLC (“Coombs Wealth” or the “Advisor”) (CRD # 281132) Disclosure Brochure. If the Client has not received a copy of the Disclosure Brochure or if the Client has any questions about the contents of the Coombs Wealth Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (610) 825-3848.

Additional information about Mr. Coombs is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 6543572.

Coombs Wealth Advisory, LLC

490 Norristown Road, Suite 250, Blue Bell, PA 19422
Phone: (610) 825-3848 * Fax: (610) 825-3529

Item 2 – Educational Background and Business Experience

Lonnie A. Coombs, CPA®, born in 1948, is dedicated to advising Clients of Coombs Wealth as a Managing Partner. Mr. Coombs earned a Bachelor of Science in Accounting from Wilkes University in 1970. Additional information regarding Mr. Coombs's employment history is included below.

Employment History:

Managing Partner, Coombs Wealth Advisory, LLC	08/2015 to Present
Partner and Accountant, Coombs & Company, LLC	01/1987 to Present

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 majority of state boards of accountancy have adopted the AICPA's® Code of Professional Conduct within their state accountancy laws or have created their own.

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Coombs. Mr. Coombs has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Coombs.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Coombs.***

However, we do encourage you to independently view the background of Mr. Coombs on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 6543572.

Item 4 – Other Business Activities

Coombs & Company, LLC

Mr. Coombs also serves as a partner of Coombs & Company, LLC (“Coombs & Company”) a tax and accounting firm under common control with the Advisor. Mr. Coombs may refer Clients to utilize the services of Coombs & Company. Clients are advised that these services may be separate and distinct from the advisory services offered by the Advisor and that the receipt of additional compensation by Mr. Coombs poses a conflict of interest. Clients are not obligated to engage Coombs & Company for these tax preparation and accounting services in order to maintain an advisory relationship with the Advisor.

Item 5 – Additional Compensation

Mr. Coombs has additional business activities where compensation is received that are detailed in Item 4 above.

Item 6 – Supervision

Mr. Coombs serves as a Managing Partner of Coombs Wealth and is supervised by Brian Coombs, Managing Partner and the Chief Compliance Officer. Mr. Coombs can be reached at (610) 825-3848.

Coombs Wealth has implemented a Code of Ethics, an internal compliance document that guide each Supervised Person in meeting their fiduciary obligations to Clients of Coombs Wealth. Further, Coombs Wealth is subject to regulatory oversight by various agencies. These agencies require registration by Coombs Wealth and its Supervised Persons. As a registered entity, Coombs Wealth is subject to examinations by regulators, which may be announced or unannounced. Coombs Wealth is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Coombs Wealth Advisory, LLC

490 Norristown Road, Suite 250, Blue Bell, PA 19422
Phone: (610) 825-3848 * Fax: (610) 825-3529

Privacy Policy

Effective Date: March 8, 2024

Our Commitment to You

Coombs Wealth Advisory, LLC ("Coombs Wealth" or the "Advisor") is committed to safeguarding the use of personal information of our Clients (also referred to as "you" and "your") that we obtain as your Investment Advisor, as described here in our Privacy Policy ("Policy").

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. Coombs Wealth (also referred to as "we", "our" and "us") protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

Coombs Wealth does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

Why you need to know?

Registered Investment Advisors ("RIAs") must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

What information do we collect from you?

Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number[s]	Income and expenses
E-mail address[es]	Investment activity
Account information (including other institutions)	Investment experience and goals

What Information do we collect from other sources?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client's personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

Coombs Wealth Advisory, LLC

490 Norristown Road, Suite 250, Blue Bell, PA 19422
Phone: (610) 825-3848 * Fax: (610) 825-3529

How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
Servicing our Clients We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, Custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.	Yes	No
Marketing Purposes Coombs Wealth does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where Coombs Wealth or the client has a formal agreement with the financial institution. We will only share information for purposes of servicing your accounts, not for marketing purposes.	No	Not Shared
Authorized Users Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent[s] or representative[s].	Yes	Yes
Information About Former Clients Coombs Wealth does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this Policy, and will provide you with a revised policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (610) 825-3848.