

Item 1 - Cover Page

SIMA Retirement Solutions, LLC

720 Moorefield Park Drive, Suite 140
North Chesterfield, VA 23235

Phone : (804) 285-5700
Fax : (804) 285-5656

www.simaretirementsolutions.com

October 21, 2024

Form ADV Part 2A Brochure

This brochure provides information about the qualifications and business practices of SIMA Retirement Solutions, 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. Registration with the SEC or any state securities authority does not imply a certain level of skill or training.

Additional information about SIMA Retirement Solutions, LLC is available on the SEC's website at www.adviserinfo.sec.gov. The firm's CRD number is 286030.

Item 2 - Material Changes

The purpose of this page is to inform you of any material changes to this Brochure since our firm's last annual updating amendment dated March 29, 2024.

On October 21, 2024, we submitted an application to apply for SEC registration based on our firm's affiliation with SIMA Wealth Partners, an investment adviser registered with the SEC. The transition to SEC registration does not impact our firm's daily operations or services we provide to you.

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.

Item 3 - Table of Contents

Contents

Item 1 - Cover Page	1
Item 2 - Material Changes	2
Item 3 - Table of Contents.....	3
Item 4 - Advisory Business.....	4
Item 5 - Fees and Compensation.....	5
Item 6 - Performance-Based Fees and Side-By-Side Management.....	7
Item 7 - Types of Clients	7
Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss	8
Item 9 - Disciplinary Information.....	11
Item 10 - Other Financial Industry Activities or Affiliations	11
Item 11 - Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	13
Item 12 - Brokerage Practices	13
Item 13 - Review of Accounts.....	14
Item 14 - Client Referrals and Other Compensation	14
Item 15 - Custody	14
Item 16 - Investment Discretion.....	15
Item 17 - Voting Client Securities	15
Item 18 - Financial Information	15

Item 4 - Advisory Business

SIMA Retirement Solutions, LLC (hereinafter "SIMA Retirement") is a registered investment advisor based in North Chesterfield, Virginia. We are a limited liability company under the laws of the State of Virginia. We have been providing investment advisory services since 2017. SIMA Financial Group, Inc. is the principal owner and a Managing Member of SIMA Retirement. Mark Allen Jones, CPA, AIF®, is the Managing Member and Chief Compliance Officer of SIMA Retirement.

The following paragraphs describe our services and fees. Additionally, you may see the term Associated Person throughout this Brochure. As used in this Brochure, this term refers to officers, employees, and any individuals providing investment advice on behalf of our firm. Persons providing investment advice are registered as investment adviser representatives in jurisdictions where required.

Retirement Plan Consulting Services

SIMA Retirement provides educational, consulting, review, and support services to qualified retirement, profit sharing, cash balance, and 401(k) plans. SIMA Retirement will also offer these services, where appropriate, to corporations and other business entities.

Our services are tailored to meet the plan's needs and investment objectives. We will meet with the plan sponsors/fiduciaries to gather information about the financial situation, investment objectives, and any reasonable restrictions you have imposed or would like to impose on the types of or specific investments for the plan options. The information we gather will help us provide advice that will be specific to the plan's needs and goals. Typically, this information is set forth in the plan's investment policy statement (IPS).

Services are offered on one-time, quarterly, and/or annual basis. Plan sponsors may choose the frequency and one or more of the following services to fit their particular needs.

Investment Policy Statement Review or Preparation

SIMA Retirement will meet with the client (in person or over the telephone) to determine the client's investment needs and goals. SIMA Retirement will then prepare a written Investment Policy Statement ("IPS") stating those needs and goals and creating a policy to help achieve these goals. The IPS will also list the criteria for selection of investment vehicles and the procedures and timing interval for monitoring of investment performance.

Review and Selection of Investment Vehicles

SIMA Retirement will review various investments, primarily mutual funds and exchange traded funds, to determine which of these investments are appropriate to implement the client's IPS. The number of investments to be recommended will be determined by the client, based on the Investment Policy Statement.

Review and Monitoring of Investment Performance

Client investments will be monitored continuously based on the procedures and timing intervals outlined in the Investment Policy Statement. Although SIMA Retirement will not be involved in any way in the purchase or sale of these investments, we may monitor the client's portfolio and will make recommendations to the client as market factors and the client's needs dictate.

Employee Communications, Education, and Enrollment Assistance

For qualified retirement, profit sharing and 401(k) plans where the individual account participant exercises control over assets in his/her own account (hereinafter "self-directed plans"), SIMA Retirement also provides educational support and investment workshops designed for the plan participants and based on the plan vendor educational materials. The nature of the topics to be covered will be determined by SIMA Retirement and the client under the guidelines established in ERISA Section 404(c). The educational support and investment workshops will NOT provide plan participants with individualized, tailored investment advice or individualized, tailored asset allocation recommendations.

Other qualified retirement plans consulting services are available on request. All of our qualified retirement plans consulting services, whether general or customized, will be outlined in an agreement that shows exactly which services will be provided and at what fee for those services.

Assets Under Management

Our services do not include direct asset management services. As such, we have no assets under management.

Item 5 - Fees and Compensation

SIMA Retirement may charge, depending on your specific contract, annual planning fees, project specific fees, hourly fees, or fees based on the amount of the plan assets under advisement.

Our fee is negotiable based upon on the complexity of client goals and objectives, and level of services rendered. The maximum fee will not exceed 1.00% of the plan assets. Hourly fees will not exceed \$300/hour. Annual and project-based fees will be determined based on the time needed to complete the service. Consulting fees are negotiable depending on factors such as the amount of plan assets, range of investment selection, number of plan participants, and frequency of educational meetings, among others. Since this fee is negotiable, the exact fee paid by the client and the payment arrangements will be clearly stated in the advisory agreement signed by the plan sponsor and our firm. The retirement plan provider will calculate the fee based on the agreed upon amount and will bill the plan according to its billing schedule and then remit the fees to SIMA Retirement on behalf of the plan. SIMA Retirement will not directly debit fees from plan assets.

At the inception of services, the first pay period's fees will be calculated on a pro-rata basis. The consulting agreement between SIMA and the client will continue in effect until either party terminates the agreement in accordance with the terms of the agreement. SIMA'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.

IRA Rollover Considerations

As a normal extension of financial advice, we provide education or recommendations related to the rollover of an employer-sponsored retirement plan. A plan participant leaving employment has several options. Each choice offers advantages and disadvantages, depending on desired investment options and services, fees and expenses, withdrawal options, required minimum distributions, tax treatment, and the investor's unique financial needs and retirement plans. The complexity of these choices may lead an investor to seek assistance from us.

An Associated Person who recommends an investor roll over plan assets into an Individual Retirement Account ("IRA") may earn an asset-based fee as a result, but no compensation if assets are retained in the plan. Thus, we have an economic incentive to encourage an investor to roll plan assets into an IRA. In most cases, fees and expenses will increase to the investor as a result because the above-described fees will apply to assets rolled over to an IRA and outlined ongoing services will be extended to these assets.

We are fiduciaries under the Investment Advisers Act of 1940 and when we provide investment advice to you regarding your retirement plan account or individual retirement account, we are also fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. We have to act in your best interests and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests.

Additional Fees and Expenses

All fees paid to SIMA Retirement for investment advisory services are separate and distinct from management fees charged by the plan vendor and 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. SIMA Retirement, its affiliates, or persons associated with SIMA Retirement do not receive any portion of such fees or expenses charged by mutual funds and exchange traded funds. The plan sponsor and/or named fiduciaries should review both the fees charged by the funds and the fees charged by SIMA Retirement to fully understand the total amount of fees to be paid by the plan and to thereby evaluate the total costs and value of the advisory services being provided.

Compensation for the Sale of Securities or Other Investment Products

Associated Persons who provide investment advice on behalf of our firm may also be associated with SIMA Wealth Partners, LLC (SIMA Wealth), a Virginia based registered investment adviser. We are affiliated through common control and ownership with SIMA Wealth. We may recommend that plan participants use SIMA Wealth for the management of their outside assets. SIMA Retirement will not directly share in the compensation received by SIMA Wealth, but individuals associated with our firm who are also associated with SIMA Wealth may be compensated in their capacities as owners, officers, and/or investment adviser representatives of SIMA Wealth. Associated Persons and we may

have a financial incentive to recommend the services of SIMA Wealth. However, you are not required to use the services of SIMA Wealth.

Compensation for the Sale of Securities or Other Investment Products

Certain Executive officers and other Associated Persons of our firm are licensed as independent insurance agents. These persons will earn commission-based compensation for selling insurance products, including insurance products they sell to our clients. Insurance commissions earned by these persons are separate from and in addition to our advisory fees. The sale of insurance instruments and other commissionable products offered by Associated Persons are intended to complement our advisory services. However, this practice presents a conflict of interest because persons providing investment advice on behalf of our firm who are insurance agents have an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely based on your needs. We address this conflict of interest by recommending insurance products only where we, in good faith, believe that it is appropriate for the client's particular needs and circumstances and only after a full presentation of the recommended insurance product to our client. In addition, we explain the insurance underwriting process to our clients to illustrate how the insurer also reviews the client's application and disclosures prior to the issuance of a resulting insuring agreement. Clients to whom the firm offers advisory services are informed that they are under no obligation to purchase insurance services. Clients who do choose to purchase insurance services are under no obligation to use our licensed Associated Persons and may use the insurance brokerage firm and agent of their choice.

All conflicts of interest between you and our firm, and the Associated Persons of our firm, 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.

Item 6 - 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.

Item 7 - Types of Clients

We offer the investment advisory services described above to pension and profit-sharing plans and their participants, 401(k)s, profit sharing plans, 403(b)s, 457 plans and defined benefit plans.

SIMA Retirement requires a minimum of \$500,000 to open and maintain an advisory relationship. At our sole discretion, we may waive this requirement.

Item 8 - 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:

- Charting – a technique that attempts to forecast future market moves by studying historical data on charts.
- Fundamental Analysis – 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.
- Technical Analysis – relies on the assumption that current market data (such as charts of price, volume, and open interest) can help predict future market trends, at least in the short term. It assumes that market psychology influences trading and can predict when stocks will rise or fall.
- Cyclical Analysis – a technique that looks at cycles, specifically analyzing the way prices follow certain patterns and trends.

We generally recommend a buy and hold strategy for mutual funds and exchange traded funds when assisting clients with investment selections for their plans.

The investment advice provided along with the strategies suggested by SIMA Retirement 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 you intend to invest in.

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.

Environmental, Social, and Governance Investment Criteria Risk: If a portfolio is subject to certain environmental, social and governance (ESG) investment criteria it may avoid purchasing certain securities for ESG reasons when it is otherwise economically advantageous to purchase those securities, or may sell certain securities for ESG reasons when it is otherwise economically advantageous to hold those securities. In general, the application of the portfolio's ESG investment criteria may affect the portfolio's exposure to certain issuers, industries, sectors and geographic areas, which may affect the financial performance of the portfolio, positively or negatively, depending on whether these issuers, industries, sectors or geographic areas are in or out of favor. An adviser can vary materially from other advisers with respect to its methodology for constructing ESG portfolios or screens, including with respect to the factors and data that it collects and evaluates as part of its process. As a result, an adviser's ESG portfolio or screen may materially differ from or contradict the conclusions reached by other ESG advisers concerning the same issuers. Further, ESG criteria are dependent on data and are subject to the risk that such data reported by issuers or received from third-party sources may be subjective, or it may be objective in principle but not verified or reliable.

Risks Associated with Investing in Inverse and Leveraged Funds: Leveraged mutual funds and ETFs generally seek to deliver multiples of the daily performance of the index or benchmark that they track. Inverse mutual funds and ETFs generally seek to deliver the opposite of the daily performance of the index or benchmark that they track. Inverse funds often are marketed as a way for investors to profit from, or at least hedge their exposure to, downward-moving markets. Some Inverse funds are both inverse and leveraged, meaning that they seek a return that is a multiple of the inverse performance of the underlying index. To accomplish their objectives, leveraged and inverse funds use a range of investment strategies, including swaps, futures contracts, and other derivative instruments. Leveraged, inverse, and leveraged inverse funds are more volatile and riskier than traditional funds due to their exposure to leverage and derivatives, particularly total return swaps and futures. At times, we will recommend leveraged and/or inversed funds, which may amplify gains and losses.

Most leveraged funds are typically designed to achieve their desired exposure on a daily (in a few cases, monthly) basis, and reset their leverage daily. A "single day" is measured from the time the leveraged fund calculates its net asset value ("NAV") to the time of the leveraged fund's next NAV calculation. The return of the leveraged fund for periods longer than a single day will be the result of each day's returns compounded over the period. Due to the effect of this mathematical

compounding, their performance over longer periods of time can differ significantly from the performance (or inverse performance) of their underlying index or benchmark during the same period of time. For periods longer than a single day, the leveraged fund will lose money when the level of the Index is flat, and the leveraged fund may lose money even if the level of the Index rises. Longer holding periods, higher index volatility, and greater leverage all exacerbate the impact of compounding on an investor's returns. During periods of higher Index volatility, the volatility of the Index may affect the leveraged fund's return as much as or more than the return of the Index itself. Therefore, holding leveraged, inverse, and leveraged inverse funds for longer periods of time increases their risk due to the effects of compounding and the inherent difficulty in market timing. Leveraged funds are riskier than similarly benchmarked funds that do not use leverage. Non-traditional funds are highly volatile and not suitable for all investors. They provide the potential for significant losses.

Risks Associated with Investing in Buffer ETFs: Buffer ETFs are also known as defined-outcome ETFs since the ETF is designed to offer downside protection for a specified period of time. These ETFs are modeled after options-based structured notes, but are generally cheaper, and offer more liquidity. Buffer ETFs are designed to safeguard against market downturns by employing complex options strategies. Buffer ETFs typically charge higher management fees that are considerably more than the index funds whose performance they attempt to track. Additionally, because buffer funds own options, they do not receive dividends from their equity holdings. Both factors result in the underperformance of the Buffer ETF compared to the index they attempt to track. Clients should carefully read the prospectus for a buffer ETF to fully understand the cost structures, risks, and features of these complex products.

Structured Notes: Below are some specific risks related to the structured notes recommended by our firm:

- *Complexity:* Structured notes are complex financial instruments. Clients should understand the reference asset(s) or index(es) and determine how the note's payoff structure incorporates such reference asset(s) or index(es) in calculating the note's performance. This payoff calculation may include leverage multiplied by the performance of the reference asset or index, protection from losses should the reference asset or index produce negative returns, and/or fees. Structured notes may have complicated payoff structures that can make it difficult for clients to accurately assess their value, risk and potential for growth through the term of the structured note. Determining the performance of each note can be complex and this calculation can vary significantly from note to note depending on the structure. Notes can be structured in a wide variety of ways. Payoff structures can be leveraged, inverse, or inverse-leveraged, which may result in larger returns or losses. Clients should carefully read the prospectus for a structured note to fully understand how the payoff on a note will be calculated and discuss these issues with our firm.
- *Market risk:* Some structured notes provide for the repayment of principal at maturity, which is often referred to as "principal protection." This principal protection is subject to the credit risk of the issuing financial institution. Many structured notes do not offer this feature. For structured notes that do not offer principal protection, the performance of the linked asset or index may cause clients to lose some, or all, of their principal. Depending on the nature of the linked asset or index, the market risk of the structured note may include changes in

equity or commodity prices, changes in interest rates or foreign exchange rates, and/or market volatility.

- *Issuance price and note value:* The price of a structured note at issuance will likely be higher than the fair value of the structured note on the date of issuance. Issuers now generally disclose an estimated value of the structured note on the cover page of the offering prospectus, allowing investors to gauge the difference between the issuer's estimated value of the note and the issuance price. The estimated value of the notes is likely lower than the issuance price of the note to investors because issuers include the costs for selling, structuring, and/or hedging the exposure on the note in the initial price of their notes. After issuance, structured notes may not be re-sold on a daily basis and thus may be difficult to value given their complexity.
- *Liquidity:* The ability to trade or sell structured notes in a secondary market is often very limited, as structured notes (other than exchange-traded notes known as ETNs) are not listed for trading on securities exchanges. As a result, the only potential buyer for a structured note may be the issuing financial institution's broker-dealer affiliate or the broker-dealer distributor of the structured note. In addition, issuers often specifically disclaim their intention to repurchase or make markets in the notes they issue. Clients should, therefore, be prepared to hold a structured note to its maturity date or risk selling the note at a discount to its value at the time of sale.
- *Credit risk:* Structured notes are unsecured debt obligations of the issuer, meaning that the issuer is obligated to make payments on the notes as promised. These promises, including any principal protection, are only as good as the financial health of the structured note issuer. If the structured note issuer defaults on these obligations, investors may lose some, or all, of the principal amount they invested in the structured notes as well as any other payments that may be due on the structured notes.

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 our firm or our management persons.

Item 10 - Other Financial Industry Activities or Affiliations

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

SIMA Financial Group, Inc. is one of the owners of SIMA Benefits Consulting Group, LLC, an insurance agency based in Virginia. SIMA Benefits Consulting Group, LLC offers insurance consulting services and various insurance products. Mr. Jones is a licensed insurance agent and can effect transactions in insurance products through SIMA Benefits Consulting Group, LLC and earn compensation for these activities. The firm expects that some plan participants in plans to whom the firm offers advisory services may also be insurance clients for whom Mr. Jones acts as an insurance agent. Clients are instructed that the fees paid to the firm for advisory services are separate and distinct from the commissions earned by its Investment Adviser Representatives for placing the client in insurance products. Clients to whom the firm offers advisory services are informed that they are under no obligation to use the firm's IARs for insurance services and may use the insurance brokerage firm and agent of their choice.

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 Retirement may also offer accounting services through SIMA Accounting Group, LLC. Associated Persons of SIMA Retirement 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, SIMA Benefits Consulting Group, and SIMA Technology Group.

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

Mr. Jones currently devotes approximately 25% of his time as the Managing Member and investment adviser representative of SIMA Wealth.

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.

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

Description of Our Code of Ethics

SIMA Retirement 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 Retirement'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 Retirement's Code of Ethics is available upon request to Mark Allen Jones, Managing Member at (804) 285-5700.

Personal Trading Practices

We provide consulting services to self-directed plans. As such, we do not implement trades on behalf of client accounts. It is possible that SIMA Retirement and/or its Associated Persons will own, buy, or sell positions in the same securities held in these plans. However, due to the nature of services offered by our firm, we do not consider this to be a conflict of interest.

Item 12 - Brokerage Practices

SIMA Retirement offers only consulting services and does not manage plan assets. Plan fiduciaries and/or investment managers are responsible for implementation of securities transactions and custody of assets in conjunction with other plan vendors/service providers. SIMA Retirement may recommend various vendors/service providers at the request of the client, but clients are under no obligation to utilize the services of any particular service provider, regardless of any affiliations, relationships, or associations with SIMA Retirement or its affiliates or with its Associated Persons.

Research and Other Soft Dollar Benefits

We do not have any soft dollar arrangements.

Brokerage for Client Referrals

We do not receive client referrals from broker-dealers and custodians and we do not receive other benefits from a broker-dealer in exchange for client referrals.

Directed Brokerage

We do not direct or implement transactions in or on behalf of client accounts. Clients direct all brokerage through their chosen vendors/service providers.

Trade Aggregation

Since we offer only consulting services, we do not implement transactions in client accounts.

Item 13 - Review of Accounts

Reviews will be conducted by your designated investment adviser representative in accordance with the agreed upon contracted services.

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, investment objectives, or upon the plan sponsor's request.

Regular written reports are typically not provided in conjunction with reviews, unless otherwise contracted for in the agreement for services.

Plan sponsors may receive copies of account statements from the custodians, or plan administrators, or other plan record-keepers.

Item 14 - Client Referrals and Other Compensation

SIMA Retirement does not receive economic benefits from third parties in exchange for providing investment advice or other advisory services to our clients. We and our related persons do not compensate, either directly or indirectly, any person or entity for client referrals.

Item 15 - Custody

SIMA Retirement does not have the authority to deduct fees directly from plan accounts.

Plan Participants will receive account statements at least quarterly; plan sponsors may receive copies of account statements from the custodians, or plan administrators, or other plan record-keepers. It is the client's responsibility to review account statements for accuracy.

Item 16 - Investment Discretion

SIMA Retirement offers consulting services only; therefore, we do not implement transactions in client accounts and we do not accept discretionary authority to manage securities accounts on behalf of clients.

Item 17 - Voting Client Securities

Proxy Voting

SIMA Retirement does not accept authority to vote client securities. Generally, if the plan holds applicable securities, the plan fiduciaries are responsible for voting proxies in the best interest of the plan participants and beneficiaries. Any proxies or other solicitations are sent to the named plan fiduciary or the plan's designated service provider directly from the custodian or transfer agent.

Item 18 - Financial Information

We are required in this Item to provide you with certain financial information or disclosures about SIMA Retirement's financial condition. SIMA Retirement does not require the prepayment of over \$1,200, six or more months in advance. Additionally, SIMA Retirement 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.

Item 19 – Requirements of State Registered Advisers has been removed