



# Prakash Investment Advisors LLC

2 Yardley Road  
Andover, MA 01810

978.273.9747

## Disclosure Brochure

*March 25, 2024*

This Form ADV2A ("Disclosure Brochure") provides information about the qualifications and business practices of Prakash Investment Advisors LLC ("PIAR" or the "Advisor"). If you have any questions about the contents of this brochure, please contact the Advisor at 978.273.9747. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority.

Prakash Investment Advisors LLC is a registered investment advisor with the U.S. Securities and Exchange Commission ("SEC"). Registration of an investment advisor does not imply any level of skill or training.

Additional information about PIAR and its Advisory Persons is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor firm name or CRD# 163994.

Item 2: Material Changes

Form ADV 2 is divided into two parts: *Part 2A* and *Part 2B*. *Part 2A* (the "Disclosure Brochure") provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. *Part 2B* (the "Brochure Supplement") provides information about the Advisory Persons of Prakash Investment Advisors LLC ("PIAR" or the "Advisor").

The Advisor encourages you to read this Disclosure Brochure and discuss any questions you may have with the Advisor.

Material Changes

The following material change has been made to this Disclosure Brochure since the last filing and distribution to Clients:

The Advisor is transitioning from a state-registered advisor to an advisor registered with the U.S. Securities and Exchange Commission ("SEC").

Future Changes

From time to time, the Advisor may amend this Disclosure Brochure to reflect changes in

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, or more often when required by regulations.

At any time, you may view the current Disclosure Brochure online at the SEC's Investment Adviser Public Disclosure website: [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with The Advisor's firm name or CRD# 163994.

The SEC's website also provides information about any persons affiliated with us who are registered as investment advisor representatives of PIAR.

You may also request a copy of this Disclosure Brochure by contacting us at 978.273.9747. The Advisor will provide you with the most recent brochure at any time without charge.

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## Item 4: Advisory Business

Prakash Investment Advisors LLC ("PIAR" or the "Advisor") is a registered investment advisor with the U.S. Securities and Exchange Commission ("SEC") based in Andover, MA. We are organized as a limited liability company under the laws of the Commonwealth of Massachusetts. We were founded in April of 2012 by Prakash D. Simha, sole owner and executive officer. Our registration as an investment advisor was subsequently approved by the Commonwealth of Massachusetts Securities Division on July 27, 2012. PIAR is currently also registered in the states of California, Louisiana, Tennessee, and Texas.

The Advisor serves as a fiduciary to Clients, as defined under the applicable laws and regulations. As a fiduciary, the Advisor upholds a duty of loyalty, fairness and good faith towards each Client and seeks to mitigate potential conflicts of interest. Our fiduciary commitment is further described in our Code of Ethics. For more information regarding our Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

As of December 31, 2023, we had \$120,792,490 in Client assets, \$113,375,802 of which are managed on a discretionary basis and \$7,416,688 on a non-discretionary basis. You may request more current information at any time by contacting the Advisor.

The following paragraphs describe our services and fees. As used in this

Disclosure Brochure, the words "you", "your" and "Client" refer to you as either a Client or prospective client of PIAR. We use the terms "we", "us", "our" and "Advisor" throughout this Disclosure Brochure to refer to Prakash Investment Advisors LLC. Also, you may see the term "Advisory Persons" throughout this brochure. Our Advisory Persons are our firm's officers, employees, and all individuals providing investment advice on behalf of our firm. The use of these terms is not intended to imply that there is more than one individual associated with the Advisor.

### *Portfolio Management*

PIAR provides customized investment advisory solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing investment management and consulting services. We work with you to identify your investment goals and objectives, as well as risk tolerance and financial situation, in order to create a portfolio strategy. We then construct a portfolio, consisting of individual equity securities, mutual funds and/or exchange-traded funds ("ETFs") to implement the allocation. We may also utilize corporate bonds, options, non-traded REITs, limited partnerships, and other securities where appropriate. We may advise upon other types of investments, as necessary, to meet the unique needs of certain Clients.

PIAR provides comprehensive investment advisory services. Typically, for liquid assets like stocks, bonds, mutual funds and ETFs, we would discuss and research various

individual securities using but not limited to, Thomson Reuters, S&P 500 reports, Morningstar Database and arrive at a mutually agreed decision to invest in specific security(s).

For other investments like REITs, limited partnerships and other illiquid investments the fee charged is on an hourly basis. Typically, such investment will take approximately 10-20 hours based on the length of time spent discussing the product with the Client, investment due diligence, communication with other professionals of the Client such as CPAs and attorneys, research and servicing the Clients - post investment. PIAR may also provide non-fiduciary services to retirement plans through the Securian platform. Securian serves as the 3(38) fiduciary to these retirement plans and PIAR receives its fees directly from Securian.

Your engagement begins with a review of your investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing your account. Your participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of your situation. PIAR shall rely on the financial and other information you or your designees provide without the duty or obligation to validate the accuracy or completeness of the provided information. It is your responsibility to inform us of any changes in financial condition, goals or other factors that may affect our analysis.

PIAR may recommend, on occasion:

- redistributing investment allocations to diversify your portfolio,
- specific positions to increase sector or asset class weightings,
- employing cash positions as a possible hedge against market movement,
- 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.

You may place reasonable restrictions on the strategies to be employed in your portfolio and the types of investments to be held in your portfolio.

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

*Retirement Accounts-* When the Advisor provides investment advice to Clients regarding ERISA retirement accounts or individual retirement accounts ("IRAs"), the Advisor is a fiduciary within the meaning of Title I of the Employee Retirement Income Security Act ("ERISA") and/or the Internal Revenue Code ("IRC"), as

applicable, which are laws governing 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 retirement account or to roll over the assets to an IRA, 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). 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.

### *Consulting Services*

PIAR will typically provide a variety of financial consulting services to individuals and families, pursuant to a written agreement. Generally, we will provide you with financial advice based on your financial goals, objectives and situation. These consulting services may encompass one or more areas of need, including, but not limited to:

- investment planning,
- evaluation of illiquid assets such as limited partnerships or limited offerings,
- retirement planning,
- personal savings,
- insurance needs
- education savings, or
- areas of your financial situation specified by you.

A financial consultation usually

includes general recommendations for a course of activity or specific actions for you to take. For example, recommendations may be made that you start or revise your investment programs, commence or alter retirement savings, establish education savings and/or charitable giving programs. We may also refer you to an accountant, attorney or another specialist, as appropriate for your unique situation.

Financial consulting recommendations may pose a potential conflict of interests, as implementation through our firm may result in increased revenues for us. You are not obligated to implement any recommendations we make or maintain an ongoing relationship with us. If you elect to act on any of the recommendations made by PIAR, you are under no obligation to do so through us.

## **Item 5: Fees and Compensation**

### *Portfolio Management Fees*

Investment advisory fees are paid quarterly, at the end of each calendar quarter, pursuant to the terms of a written agreement. The investment advisory fee is based on the market value of your assets under our management at the end of each quarter. Generally, investment advisory fees are charged at a rate between 1.00% and 2.00% annually (billed quarterly) according to the following schedule:

0-1	Million – 2.0%
1-2	Million – 1.8%
2-3	Million – 1.6%
3-4	Million – 1.4 %

4+ Million – 1.0%

The investment advisory fee in the first quarter of service is prorated from the inception date of the account[s] to the end of the first quarter. The fee for the first quarter may be waived completely or delayed until the invoice of the first full quarter of service. Fees are negotiable at our sole discretion for some extenuating circumstances like death of a breadwinner of the family, disability, divorce or any such circumstances that may lead to financial distress. Your fees take into consideration the aggregate assets under management and advisement with us, the complexity of your financial situation, and the range of services provided. All securities held in accounts managed by PIAR will be independently valued by your Custodian. We will not have the authority or responsibility to value portfolio securities.

You must provide written authorization permitting PIAR to be paid directly from your accounts held by your Custodian as part of our agreement and separate account forms provided by your Custodian. You may specify the account from which you wish to have your advisory fees withdrawn. We shall send an invoice to your Custodian indicating the amount of the fees to be deducted from your account 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 and advisement with PIAR at the end of each quarter.

You are provided with a statement, at least quarterly, from the Custodian reflecting the deduction of the investment advisory fee. It is your responsibility to verify the accuracy of these fees, as the Custodian does not assume this responsibility.

Either party may terminate the investment advisory agreement, at any time, by providing written notice to the other party. In addition, you may terminate the investment advisory agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, you are responsible for the payment of fees up to and including the effective date of termination. Upon termination, we will refund any unearned, prepaid fees on a pro rata basis. Your investment advisory agreement with us is non-transferable without your prior consent.

### *Consulting Services Fees*

PIAR offers consulting services on an hourly basis at the rate of \$250, which may be negotiable, at the sole discretion of the Advisor, depending on the nature and complexity of each Client's circumstances. An estimate of total hours will be determined prior to establishing the advisory relationship. Consulting service fees are invoiced by the Advisor and are due upon receipt of the agreed upon deliverable[s].

Either party may terminate a consulting agreement, at any time, by providing written notice to the other party. In addition, you may terminate the agreement within five (5) business



days of signing the agreement without penalty. After the five-day period, you will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable. Refunds will be given on a pro-rata basis. Your consulting agreement with us is non-transferable without your prior consent.

### *Other Potential Fees*

In addition to our fees, you may be required to pay other charges such as:

- custody fees,
- brokerage commissions,
- transaction fees,
- internal fees and expenses charged by mutual funds or exchange traded funds ("ETFs"), and
- other fees and taxes on brokerage accounts and securities transactions.

None of these fees are paid to or are shared with us.

As part of our investment advisory services to you, we may invest, or recommend that you invest, in mutual funds and exchange traded funds. Our recommended Custodian does not charge securities transaction fees for ETF and equity trades in Client account, provided that the account meets the terms and conditions of the Custodian's brokerage requirements. However, the Custodian typically charges for mutual funds and other types of investments. The fees that you pay to our firm for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and ETFs (as

described in each fund's prospectus) to their shareholders. These fees will generally include a management fee, other fund expenses, account administration (e.g. custody, brokerage and account reporting), and a possible distribution fee.

You could invest in these products directly, but would not receive the services provided by PIAR. These services are designed, among other things, to assist you in determining which products or services are most appropriate to your financial situation and objectives.

To fully understand the total cost you will incur, you should review all the fees charged by mutual funds, exchange traded funds, our firm, and others. For information on our brokerage practices, please refer to Item 12: Brokerage Practices.

### **Item 6: Performance-Based Fees and Side-by-Side Management**

We do not charge performance-based fees (fees that are based on a share of capital gains or capital appreciation of a Client's account[s]). Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees. We do not accept performance-based fees or participate in side-by-side management. Our fees are calculated as described in Item 5: Fees and Compensation section above, and are not charged on the basis of a share of capital gains upon, or capital appreciation of, the funds in your advisory account.

## Item 7: Types of Clients

We offer our advisory services primarily to individuals, high net worth individuals, trusts, estates and defined contribution plans. PIAR generally does not impose a minimum size for establishing a relationship.

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

Our research and analysis 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. We primarily employ fundamental analysis methods in developing investment strategies for you.

*Fundamental analysis* is a method of evaluating a company that has issued securities by attempting to measure the value of its underlying assets. This entails studying overall economic and industry conditions as well as the financial condition and the quality of the company's management. Earnings, expenses, assets, and liabilities are all important in determining the value of a company. The value is then compared to the current price of the company's securities to determine whether to purchase, sell or hold those securities.

PIAR generally employs long-term investment strategies, as consistent with your financial goals. We 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 your cash needs. At times, PIAR may also buy and sell positions that are more short-term in nature, depending on your goals and the fundamentals of the security, sector or asset class.

Funds are continuously monitored and can be recommended for removal from accounts for a number of reasons. Reasons for elimination may include:

- underperformance of the manager versus peers or expectations,
- identification of lower internal costs,
- an increase in volatility of a manager's returns,
- an unwanted change or drift in strategy, or
- a change in management.

PIAR may employ options strategies to hedge or gain additional exposure to a particular asset class or sector. Our investment strategy may encompass active trading in concentrated portfolios.

You may place reasonable restrictions on the strategies to be employed in your portfolio and the types of investments to be held in your portfolio.

The use of options are higher risk strategies. Investments in options contracts have the risk of losing value in a relatively short period of time. Option contracts are leveraged instruments that allow the holder of a single contract to control many shares of an underlying stock. This leverage



can compound gains or losses. Options can also expire worthless.

#### ETF Risks

The performance of ETFs is subject to market risk, including the possible loss of principal. The price of the ETFs will fluctuate with the price 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 have a large bid-ask spread and low trading volume. The price of an ETF fluctuates based upon the market movements and may dissociate from the index being tracked by the ETF or the price of the underlying investments. An ETF purchased or sold at one point in the day may have a different price 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 price of the mutual funds will fluctuate with the value of the underlying securities that make up the funds. The price of a mutual fund is typically set daily therefore a mutual fund purchased at one point in the day will typically have the same price as a mutual fund purchased later that same day.

#### Options Contracts

Investments in options contracts have the risk of losing value in a relatively short period of time. Option contracts are leveraged instruments that allow the holder of a single contract to control many shares of an underlying stock. This leverage can compound gains or losses.

#### Real Estate Investment Trusts ("REITs")

Investing in Real Estate Investment Trusts ("REITs") involves certain distinct risks in addition to those risks associated with investing in the real estate industry in general. Equity REITs may be affected by changes in the value of the underlying property owned by the REITs, while mortgage REITs may be affected by the quality of credit extended. REITs are subject to heavy cash flow dependency, default by borrowers and self-liquidation. REITs, especially mortgage REITs, are also subject to interest rate risk (i.e., as interest rates rise, the value of the REIT may decline).

Although we manage your portfolio in a manner consistent with your specific risk tolerances, there can be no guarantee that our efforts will be successful. General economic conditions, current interest rates, the performance of a particular industry or a particular company, and any number of other factors can affect investment performance. All investments involve risks that can result in loss:

- loss of principal,
- a reduction in earnings (including interest, dividends and other distributions), and
- the loss of future earnings.

You should be prepared to bear the risk of loss.

### **Item 9: Disciplinary Information**

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.

You may independently view the background of the Advisor on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the firm name or the Advisor's CRD# 163994.

In addition, Clients may also obtain information relating to the disciplinary history of any investment advisor representative conducting business in Massachusetts by contacting the Commonwealth of Massachusetts Securities Division at (617) 727-3548.

### **Item 10: Other Financial Industry Activities and Affiliations**

PIAR and our Advisory Persons do not have any affiliations with other firms, other than contracted service providers, to assist with the servicing of Client accounts.

PIAR does not utilize a third-party money manager.

### **Item 11: Code of Ethics, Participation or Interest in Client**

## **Transactions and Personal Trading**

### *Description of Our Code of Ethics*

We strive to comply with applicable laws and regulations governing our practices. Therefore, our Code of Ethics ("Code") includes guidelines for professional standards of conduct for our Advisory Persons. Our goal is to protect your interests at all times and to demonstrate our commitment to our fiduciary duties of honesty, good faith, and fair dealing with you. All of our Advisory Persons are expected to adhere strictly to these guidelines. Persons associated with our firm are also required to report any violations of our Code. Additionally, we maintain and enforce written policies reasonably designed to prevent the misuse or dissemination of material, non-public information about you or your account holdings by persons associated with our firm. We will provide a copy of our Code Ethics to you or any prospective Client upon request.

### *Personal Trading Practices*

Our firm or its Advisory Persons may buy or sell the same securities that we recommend to you or securities in which you are already invested. A conflict of interest exists in such cases because we have the ability to trade ahead of you and potentially receive more favorable prices than you will receive. To eliminate this conflict of interest, it is our policy that Advisory Persons shall not have priority over your account in the purchase or sale of securities.

PIAR allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. PIAR 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. PIAR does not have a material interest in any securities traded in Client accounts.

### **Item 12: Brokerage Practices**

PIAR requires you to select the broker-dealer/custodian (herein the "Custodian") to safeguard your assets. You must authorize us to direct trades to the Custodian as provided by our written agreement. Not all advisors require their Clients to direct brokerage trades. When you direct brokerage, we do not have an obligation to seek and may be unable to achieve the most favorable execution for your transactions. Thus, the transactions may cost you more than if the brokerage were not directed.

PIAR - when referring Clients to dealers will only refer Clients to dealers registered in states where the Clients reside.

PIAR 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". PIAR maintains an institutional relationship with Schwab, whereby the Advisor receives economic benefits from Schwab. Please see Item 14 below.

### **Item 13: Review of Accounts**

Securities in Client accounts are monitored on a regular and continuous basis by Mr. Simha, President of PIAR. The Advisor also monitors Client financial plans on a regular and continuous basis. Formal reviews are generally conducted at least annually depending on the needs of the Client.

We recommend changes or alternate investments or opportunities when we believe it is appropriate to do so. General conditions in the stock and bond markets are continuously monitored. Factors triggering reviews, and perhaps triggering buy or sell recommendations, include a change of your personal or financial circumstances, changes in general conditions in the stock and bond markets, material changes in the economic or political climate, and changes in the individual investments you own.

Clients receive custodial statements no less than quarterly directly from the Custodian. You may also establish electronic access to the Custodian's website so that you may view these reports and their account activity online. These custodial statements include all positions, transactions and fees relating to your account[s].

### **Item 14: Client Referrals and Other Compensation**

We do not directly or indirectly compensate any person who is not one of our Advisory Persons for Client referrals.

### *Participation in Institutional Advisor Platform*

PIAR has established an institutional relationship with Schwab through its “Schwab Advisor Services” unit, a division of Schwab dedicated to serving independent advisory firms like PIAR. As a registered investment advisor participating on the Schwab Advisor Services platform, PIAR 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 potential 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 and financial support to PIAR that may not benefit the Client, including: educational conferences and events, financial start-up support, 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 potential conflict of interest. PIAR believes, however, that the selection of Schwab as Custodian is in the best interests of its Clients. In addition, we may receive reimbursement from product sponsors for all or a portion of travel expenses incurred during due diligence trips to investigate various securities we may recommend to you. This creates a

conflict of interest as it may incent us to recommend investments where the sponsor pays for such trips over those who do not. Our recommendation of a particular product may be based in part on the economic benefit to us and not solely on the nature, cost or quality of the investment provided to you and our other Clients. We nonetheless strive to act in your best interests at all times. We keep records of our due diligence and investment analyses, recommending only those investments we believe meet your individual needs.

### **Item 15: Custody**

PIAR does not accept or maintain custody of any Client accounts, except for the authorized deduction of the Advisor's fees. 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 PIAR to utilize the Custodian for the Client's security transactions. Clients provide written authorization permitting PIAR to be paid directly from their account[s] held by the Custodian as part of the investment advisory agreement and separate account forms provided by 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. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the investment advisory 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. Clients should review statements provided by the Custodian and compare to any reports provided by PIAR 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**

PIAR may have 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 PIAR. 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 investment advisory agreement containing all applicable limitations to such authority. All discretionary trades made by PIAR will be in accordance with each Client's investment objectives and goals.

### **Item 17: Voting Client Securities**

We will not vote proxies on behalf of your advisory accounts. If you own shares of common stock or mutual funds, you are responsible for exercising your right to vote as a shareholder. We may assist you by answering questions relating to proxies, however, you retain the sole responsibility for proxy decisions and voting. We are expressly precluded

from voting proxies on behalf of ERISA accounts. In addition, we do not take any action with respect to securities that are named in, or subject to, class action lawsuits. You should receive your proxies or other solicitations directly from your custodian or a transfer agent.

### **Item 18: Financial Information**

Neither PIAR nor its Advisory Persons, have any adverse financial situations that would reasonably impair the

ability of PIAR to meet all obligations to its Clients. Neither PIAR nor its Advisory Persons, have been subject to a bankruptcy or financial compromise.

PIAR is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect advance fees of \$1,200 or more for services to be performed six months or more in the future.





# Prakash Investment Advisors LLC

Prakash D. Simha

2 Yardley Road  
Andover, MA 01810

978.273.9747

## Brochure Supplement

March 25, 2024

This Form ADV 2B ("Brochure Supplement") provides information about Prakash D. Simha that supplements the Disclosure Brochure for Prakash Investment Advisors LLC. (CRD# 163994) You should have received a copy of that Disclosure Brochure. Please contact Prakash Simha, President & Chief Compliance Officer, if you did not receive our Disclosure Brochure or if you have any questions about the contents of this supplement.

Additional information about Prakash D. Simha is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 2970036.

## Item 2: Educational Background and Business Experience

Prakash D. Simha

CRD# 2970036

*Year of birth:* 1955

### *Formal education:*

- Madurai Kamaraj University, PhD - 1988
- Madurai Kamaraj University, MS in Molecular Biology - 1982
- Bengaluru University, BS - 1978

### *Business background:*

- Prakash Investment Advisors LLC, President & Chief Compliance Officer, 07/2012 - Present
- The Strategic Financial Alliance, Inc., Investment Adviser Representative & Registered Representative, 12/2009 – 09/2012
- Golden Lotus Financials, Representative 02/2003 - 07/2012
- Investors Capital Corp., Registered Representative, 02/2003 – 12/2009
- MetLife Securities, Inc., Registered Representative, 10/1997 – 02/2003
- Metropolitan Life Insurance Co., Insurance Agent, 10/1997 – 02/2003

## Item 3: Disciplinary Information

There are no legal or civil events to disclose regarding Mr. Simha. He has never been involved in any civil or criminal action. There have been no lawsuits, arbitration claims, or related proceedings against Mr. Simha.

We encourage you to independently view the background of Mr. Simha on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by [searching with his full name and his Individual CRD# 2970036](#). In addition, you may also obtain information relating to the disciplinary history of any investment advisor representative conducting business in Massachusetts by contacting the Commonwealth of Massachusetts Securities Division at (617) 727-3548.

#### **Item 4: Other Business Activities**

Mr. Simha is dedicated to the Investment Advisory activities of PIAR's clients. Mr. Simha does not have any other business activities.

#### **Item 5: Additional Compensation**

Mr. Simha is dedicated to the investment advisory activities of PIAR. Mr. Simha does not receive any additional forms of compensation..

#### **Item 6: Supervision**

As President and Chief Compliance Officer of PIAR, Mr. Simha is not supervised by other persons in our firm. However, PIAR has written supervisory procedures in place that are reasonably designed to detect and prevent violations of the securities laws, rules, and regulations. Mr. Simha is also required to adhere to the processes and procedures described in our Code of Ethics. As described under Item 3: Disciplinary Information, Mr. Simha and PIAR are subject to an annual compliance review by an independent third party approved by the Massachusetts Securities Division. Mr. Simha can be reached at (978) 273-9747.

Furthermore, PIAR is subject to regulatory oversight by various agencies. These agencies require registration by PIAR and its employees. As a registered entity, PIAR is subject to examinations by regulators, which may be announced or unannounced. PIAR 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.

## Privacy Policy

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Effective: March 25, 2024

### Our Commitment to You

Prakash Investment Advisors LLC ("PIAR" or the "Advisor") is committed to safeguarding the use of personal information of our Client's (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. PIAR (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.

PIAR 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?

Driver's license number	Date of birth
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.

## 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?
<b>Servicing our Clients</b> 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
<b>Marketing Purposes</b> PIAR 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 PIAR or the Client has a formal agreement with the financial institution. <b>We will only share information for purposes of servicing your accounts, not for marketing purposes.</b>	No	Not Shared
<b>Authorized Users</b> 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
<b>Information About Former Clients</b> PIAR 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

## State-specific Regulations

Massachusetts	In response to Massachusetts law, the Client must "opt-in" to share non-public personal information with non-affiliated third parties before any personal information is disclosed. Client opt-in is obtained through the Client's execution of authorization forms provided by the third parties, by executing an Information Sharing Authorization Form, or by other written consent by the Client, as appropriate and consistent with applicable laws and regulations.
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## 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 (978) 273-9747.