

**FORM ADV Uniform Application for Investment Adviser Registration**  
**Part 2A: Investment Adviser Brochure and Brochure Supplements**  
**Item 1: Cover Page**

# **VIMA, LLC**

**46 E. Square Lake Rd.  
Troy, MI 48085  
(248) 526-6700**

**[www.vimawealth.com](http://www.vimawealth.com)**

**Firm CRD#: 148833**

**Version date: September 22, 2023**

## **Item 2: Material Changes**

The material changes in this brochure from the last annual updating amendment on March 15, 2023, of VIMA LLC are described below. Material changes relate to VIMA, LLC's policies, practices, or conflicts of interests.

- VIMA LLC has updated their Assets Under Management (Item 4).

Additional information about VIMA and its representatives is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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#### **Item 4: Investment Advisory Business**

Established in 2009 by Michael Mazzola and Michael Vissotski, VIMA, LLC ("VIMA") provides investment advisory services to clients on a discretionary and non-discretionary basis. Clients are predominantly individuals. VIMA also provides financial planning and consulting services (in part to document the implementation of our investment management strategy). The strategy is then implemented in conjunction with the client's investment goals and objectives, level of risk tolerance, liquidity needs, tax and/or legal implications and other concerns where applicable.

The firm customizes client portfolios and invests in publicly traded equity and fixed income securities, mutual funds, ETFs, and may utilize various covered call writing strategies. These services are provided pursuant to one or more written advisory agreements setting forth the terms and conditions of these services. Clients can impose restrictions on investing in certain securities or types of securities.

As of September 2023, VIMA has a total of approximately \$ 109,000,000.00 assets under management. Of this total asset amount, \$ 108,700,000.00 is considered discretionary assets and \$ 300,000.00 is managed non-discretionary.

Additionally, VIMA has \$3 million in assets under advisement (AUA). AUA refers to accounts that VIMA receives compensation for advice, but the client ultimately executes the transaction at their discretion.

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

The firm charges a management fee ranging between 0.1% and 2.5% of total assets under management on an annualized basis. The fee structure is expressed on an annualized basis and is collected quarterly, in advance, or arrears depending on the financial advisor you work with. Fees are directly debited from client accounts by the qualified third - party custodian as authorized in a Client's written agreement with VIMA.

Clients who use our services for 401k only consulting (no assets directly with our custodians) will be mailed or emailed an invoice on a quarterly basis, and can pay by check or credit card only. The firm charges a management fee ranging between 0.1% and 2.5% of total assets under advisement and is collected quarterly, at the end of the previous quarter. If you have assets with a custodian and you want 401k consulting advice, you have the option of debiting the total fees within the custodial assets, or paying by check or credit card for the 401k advice only. You cannot write a check for all assets under management.

The fee schedule varies by financial advisor, but no advisor can charge no more than 2.5% per year: (the following fee schedule is negotiable and gives general guidelines only).

\$1 - \$250,000 = 1.5%

\$250,001-\$500,000=1.35%

\$500,001 - \$750,000 = 1.25%

\$750,001-\$1,000,000 = 1%

\$1,000,001+=negotiable

VIMA's annual investment advisory fee for discretionary contracts includes both investment management services and financial planning and consulting services. Non-discretionary contracts include investment management services with optional financial planning and consulting services. The firm considers these services complimentary to providing appropriate investment management services.

VIMA also offers a fixed fee for services relationship. (You can request the Fixed Fee Agreement contract from you Financial Advisor). You can pay for consulting advice in lieu of moving assets directly to custodians offered (Pershing & TD Ameritrade). This can come in the form of Financial Planning, 401k advice & recommendations, debt management, or any financial advice in general.

Where clients may incur additional expense from brokerage-based activities, clients should be aware that all custodial and transaction fees remain separate and distinct from those fees charged by the firm for its asset management (and the included financial planning / consulting) services.

All fees paid to VIMA for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds to their shareholders (our clients). These fees and expenses are described in each fund's prospectus. These fees will 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.

Supervised persons of VIMA may receive compensation for the sale of insurance products in the supervised person's separate capacity as a licensed insurance agent. When acting in this capacity, supervised persons will receive commissions for selling insurance and annuity products. Please refer to Item 10 – Other Financial Industry Activities and Affiliations for disclosures related to this outside business activity as insurance agents. If a client has purchased a fixed insurance product or annuity from a supervised person of VIMA in the supervised person's separate capacity as an insurance agent, the value of the fixed insurance product or fixed annuity is not considered an asset under management for the client's advisory account managed by VIMA and the value of such fixed insurance product or fixed annuity is not included in the value of Assets Under Management for the purpose of calculating the client's advisory fee for VIMA's investment management services.

Accordingly, clients should review both the fees charged by the mutual funds and the advisory fees charged by the firm to fully appreciate the total amount of fees to be paid by the client.

VIMA and clients may terminate the advisory agreement, in whole or in part, at any time. Upon termination, any fees paid in advance will be prorated to the date of termination and any excess shall be refunded to the client.

VIMA and its supervised persons receive 50% or more of their revenue from advisory fees charged for advisory services provided through VIMA. VIMA and its supervised persons do not receive more than 50% of their revenue from advisory clients from commissions and other compensation related to the sale of investment products that are recommended to clients.

Termination of contract can be verbal or written. Termination of contract starts when we receive an outgoing transfer from the client for money held with our custodian. 401k consulting clients (no transfer of money to our custodian) can terminate the contract verbally or in writing. The contract ceases the day the written or verbal request is received by our office.

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

As the firm's advisory services do not incorporate performance fees or the offering of any additional investment services, side-by-side management does not apply to those services rendered by VIMA.

#### **Item 7: Types of Clients**

The firm provides investment advisory services to individuals and high net worth individuals. VIMA does not require clients to maintain a minimum account size for investment management clients. Any advisory agreement with VIMA is non-transferable without the client's written approval.

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

VIMA's primary asset management strategy utilizes a top down approach for each investment sector, filtering securities by various ratio criteria. The securities selected are designed to reduce risk and increase performance. In order to accomplish this objective, the firm primarily invests in exchange-listed securities, CD's, mutual fund shares, ETF's, and in some instances, employs a covered call option writing strategy over the long term.

Although the intent of the options-related transactions that may be implemented by the firm is to produce current income and and/or to hedge against principal risk, certain of the options-related strategies may, in and of themselves, produce principal volatility and/or risk. Thus, a client must be willing to accept these enhanced volatility and principal

risks associated with such strategies. In light of these enhanced risks, client may direct the VIMA, in writing, not to employ any or all such strategies

Additionally, the firm may recommend employing cash positions as a possible hedge against market movement, where such movements may adversely affect the portfolio. VIMA may also 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, or any risk deemed unacceptable for the client's risk tolerance.

In some instances, clients may authorize the use of margin in their account, typically for liquidity purposes. As a result, clients assume the additional principal risks associated with the use of margin. Clients authorizing margin are advised of the potential conflict of interest whereby the client's decision to employ margin shall correspondingly increase the management fee payable to VIMA. The decision to employ margin in a client account is left totally to the discretion of client. In addition, a Client will incur additional portfolio costs related to Margin (an interest fee payable to your broker / custodian as margin is "borrowing" cash from the broker based on your portfolio value).

**Risk of Loss:** Investing in securities involves a certain amount of risk of loss that clients should be prepared to bear. Where short term trading methods are employed, the cost of more frequent trades can often incur more expense than that of a more conservative or long-term purchase approach. Questions regarding these risks and/or increased costs may be directed to the firm and its representatives.

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

Please note, the firm does not have any disciplinary, regulatory, criminal, civil, or otherwise reportable history to disclose at this time. However, there is a disciplinary event to report for an individual advisor of the firm. Please review page 21 of this handout &/or FINRA's broker check for more detailed information.

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

VIMA is **not** and does **not** have a related person that is a broker/dealer, municipal securities dealer, government securities dealer or broker, an investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund), another investment adviser or financial planner, a futures commission merchant, commodity pool operator, or commodity trading advisor, a banking or thrift institution, an accountant or accounting firm, a lawyer or law firm, a pension consultant, a real estate broker or dealer, or a sponsor or syndicator of limited partnerships.

Investment adviser representatives serve as separately licensed insurance agents and, as such, are involved with the sale and servicing of fixed annuities on behalf of various insurance providers. If a client elects to purchase insurance products through individuals

associated with VIMA, said individuals will be compensated by the provider on a commission basis. This receipt of commissions creates an incentive for the representative to recommend those products for which the investment adviser representative will receive a commission in the representative's separate capacity as an insurance agent. Consequently, the advice rendered to a client could be biased. Clients are under no obligation to implement any insurance or annuity transaction through the investment adviser representatives of VIMA.

Note: Although VIMA provides financial planning and consulting services to all portfolio management Clients (for no additional fee) if a Client purchases a fixed annuity through VIMA and our Investment Adviser Representatives as insurance agents or brokers, the additional compensation is not used to off-set the advisory fees (see Item 4, above) that you pay to VIMA.

The firm maintains a fiduciary obligation to place its clients' interests first. However, clients should be aware that the receipt of additional compensation itself can create a conflict of interest and may affect the judgment of this individual when making investment recommendations. In order to properly handle such potential conflicts of interest, the firm has adopted a Code of Ethics. Please see Item 11 (below) for further discussion related to the firm's Code of Ethics.

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

VIMA and/or its representatives may purchase or sell investments for their personal accounts that they have similarly recommended to clients. VIMA has adopted a Code of Ethics that sets forth the basic policies of ethical conduct for all managers, officers, and employees of the firm. The Code of Ethics describes the firm's fiduciary duties and obligations to clients and sets forth the firm's practice of supervising the personal securities transactions of employees who maintain access to client information.

The Code also addresses:

- Prohibitions on insider trading
- Restrictions on the receipt or provision of gifts, entertainment or gratuities
- Restrictions on political contributions (play-to-play)
- And addresses the sanctions that VIMA imposes on those who violate our Code

The firm collects and maintains records of securities holdings and transactions made by employees. The firm reviews the personal trading practices of its employees to identify and resolve any potential or realized conflicts of interest. A copy of VIMA's Code of Ethics is available upon request.



## **Item 12: Brokerage Practices**

The firm will recommend to clients that investment management accounts be maintained at one of our custodians-Pershing or TD Ameritrade. As a condition of receiving the firm's services, Clients must independently evaluate our custodial options to ensure that custodian meets the Client's needs. The firm requires Clients to then "Direct" VIMA to use the chosen custodian for all Client Account security transactions (see below).

Factors that the VIMA considers in recommending custodians (or any other broker-dealer to clients) include, but are not limited to the following:

- historical relationship with the firm,
- financial strength,
- reputation,
- execution capabilities,
- pricing,
- research, and
- service.

The transaction charge paid by clients, VIMA believes are reasonable in light of the services provided to VIMA's client's fiduciary duty to obtain best execution.

Clients and the firm may receive from the custodian without cost (and/or at a discount) support services and/or products which assist the VIMA to better monitor and service client accounts maintained at the custodial institution. Included within the support services may be investment-related research, pricing information and market data, financial planning software and other technology.

There is no corresponding commitment made by the firm to the custodian or any other any entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as result of the above arrangement.

In addition, the firm does not receive any research, products, client referrals, or other services from a broker-dealer or third party in connection with client-based securities transactions (i.e. no soft dollars), including our custodians.

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

Accounts will be monitored on an on-going basis by Michael Mazzola and Michael Vissotski. Accounts may be reviewed more frequently as necessary to respond to significant changes in client circumstances or changes in market conditions. Triggering factors to warrant more in-depth review could include the following;

- Awareness of a change in client's investment objective
- change in market conditions
- change in client's employment status
- re-balancing of assets to maintain proper asset allocation
- other activity discovered as the account is normally reviewed.

Clients receive written brokerage or custodial statements each month from their custodian and are encouraged to notify the firm of changes to personal finances, especially those changes that might adversely affect client's investment plan.

VIMA, itself does not issue reports to any Client; the only reports on your accounts that you receive are from your independent, third party qualified custodian.

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

VIMA will periodically compensate, either directly or indirectly, another person or an entity for client referrals. Clients that are referred to VIMA are not obligated to use our services. It is merely another option for the client. At the time VIMA is introduced to the client, the Client referred to us will receive a solicitor disclosure statement to review.

#### **Item 15: Custody**

Other than the client authorized direct deductions of fees from accounts, VIMA does not maintain or accept actual custody\* or possession of client funds or securities. The firm, in several instances does have knowledge of client's user ID and passwords which allows them to affect trades on their behalf in their account.

These accounts will be subject to an annual surprise audit by an appropriately designated Certified Public Accountant with the results of such examination filed with the Securities and Exchange Commission (as required by Rule).

When fees are deducted from a client's account, VIMA is responsible for calculating the fee and delivering instructions to the custodian. At the same time that VIMA instructs the custodian to deduct fees from the client's account, VIMA will send the client an invoice itemizing the fee. Itemization will include the formula used to calculate the fee, the amount of assets under management the fee is based on, and the time period covered by the fee. Clients will receive at least quarterly statements from the custodian. We urge our clients to compare the account statements received from the custodian with the invoice received from VIMA.

\*Custody means holding, directly or indirectly, client funds or securities, or having any authority to obtain possession of them.

#### **Item 16: Investment Discretion**

VIMA typically maintains discretionary authority over the selection and amount of securities to be bought or sold in client accounts without obtaining prior consent or approval from clients.

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 the firm.

The firm does maintain several non-discretionary accounts where Clients must provide prior consent to the transaction (via telephone call, email or other communication methodology). Please understand that if non-discretionary Clients are not available during market hours, VIMA cannot place transactions for a Client's account.

As stated above (Item 12) transactions are placed at your custodian are subject to your written instructions; however, if you have contracted for management services for qualified plan account assets (such as your 401(k) account), then transactions for the qualified plan account will be placed with the applicable qualified plan account custodian.

If you have elected to receive investment management for your 401k or other qualified plan account, you may be asked to provide VIMA with on-line access information (your User ID and Password) for your qualified plan account. VIMA will use your on-line access information exclusively to manage your segregated qualified plan account on a discretionary or non-discretionary basis, as specified in your advisory services agreement with VIMA. VIMA will not have authority to submit a request for a distribution or withdrawal of funds from your qualified plan account. If VIMA's management services for your qualified plan account are terminated for any reason, then in order to ensure that VIMA will not have continued access to your qualified plan account, you should promptly change your User ID and Password that had been provided to VIMA.

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

VIMA does not maintain any voting or proxy rights with respect to corporate actions related to such assets. The client will vote their own proxies, which they will receive directly from the respective custodian / broker-dealer.

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

Investment advisers are required to disclose certain and financial information about their business practices that might serve as material to the client's decision in choosing an investment adviser.

VIMA does not maintain any financial hardships or other conditions that might impair its ability to meet its contractual obligations to clients.

#### **Item 19: Requirements for State-Registered Advisers**

##### **Executive Officer and Management Personnel**

Michael Mazzola is the Managing Member and Chief Compliance Officer of VIMA and Michael Vissotski is a Member/Co-Owner of VIMA.

## **Michael Mazzola, Managing Member & Chief Compliance Officer**

### **Education:**

- Michigan State, B.S. Finance, 2001

### **Business Background**

- 2009 to present, VIMA, LLC, Managing Member
- 2003 -2009, UBS Financial Services, Inc., Financial Adviser
- 2001-2003, Morgan Stanley Dean Witter, Financial Adviser

## **Michael Vissotski, Member/Co-Owner**

### **Education:**

- Macomb College, Liberal Arts
- Wayne State University, Engineering

### **Business Background**

- 2009 to present, VIMA, LLC, Managing Member
- 2003-2009, UBS Financial Services, Inc., Financial Adviser
- 1996-2003, Morgan Stanley Dean Witter, Financial Adviser

### **Other Business Activities**

See Item 10 – Other Financial Industry Activities and Affiliations.

### **No Performance Based Fees**

As previously disclosed in Item 6, VIMA does not charge or accept performance-based fees.

### **No Arbitrations**

Neither VIMA nor any of its associated persons have been the subject of any client arbitrations or similar legal disputes.

**FORM ADV Uniform Application for Investment Adviser Registration**

**Part 2B: Brochure Supplements**  
**Investment Adviser Representatives and/or Supervised Persons: Supplemental information**  
**Item 1: Cover Page**

**Michael Mazzola**  
**Michael Vissotski**  
**Michel Tenaglia**  
**Michael Maley**  
**Sid Jamil**  
**Marguerite Tschirhart**  
**James Waugh**  
**Michael A. Olson**  
**Matthew Doering**  
**David Roberts**  
**Dennis Prost**

**46 E. Square Lake**  
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**Firm CRD#: 148833**

*This brochure provides information about the qualifications and business practices on the following individual as a representative of VIMA, LLC. This information is provided as a supplement to the Form ADV Part 2A which has been provided for your review. Should you have any questions about this supplement, or if you have not received the Form ADV Part 2A please contact the firm immediately.*

*The information in this brochure supplement has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Please note, where this brochure supplement may use the terms "registered investment adviser" and/or "registered", registration itself does not imply a certain level of skill or training.*

*Additional information about the firm and this representative is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)*

**Item 2: Education and Background and Business Experience**

**Individual Full Name, Title or Designation:** Michael Mazzola

**Years of Experience: 21**

**Education:**

- Michigan State, B.S. Finance, 2001

**Business Background**

- 2009 to present, VIMA, LLC, Managing Member
- 2003 -2009, UBS Financial Services, Inc., Financial Advisor
- 2001-2003, Morgan Stanley Dean Witter, Financial Advisor

**Item 3: Disciplinary Information**

Mr. Mazzola does not have any legal, civil, criminal, regulatory, or disciplinary history to report at this time.

**Item 4 and 5: Other Business Activities and Additional Compensation**

Mr. Mazzola is independently licensed to sell insurance and annuity products through various insurance companies. When acting in this capacity, he will receive commissions for selling insurance and annuity products.

Mr. Mazzola may also receive other incentive awards for the recommendation/sale of annuities and other insurance products. The receipt of compensation and other incentive benefits may affect the judgment of Mr. Mazzola when recommending products to clients. While he endeavors at all times to put the interest of his clients first as a part of VIMA's overall fiduciary duty to clients, clients should be aware that the receipt of commissions and additional compensation itself creates a conflict of interest and may affect Mr. Mazzola's decision-making process when making recommendations.

Clients are never obligated or required to purchase insurance products from or through Mr. Mazzola and may choose any independent insurance agent and insurance company to purchase insurance products. Regardless of the insurance agent selected, the insurance agent or agency will receive normal commissions from the sale.

**Item 6: Supervision**

Michael Mazzola remains responsible for the supervision of each employee of the firm. This supervision extends to reviewing their business practices and monitoring the advice given to clients. Questions related to the activities of any employee may be directed to Mr. Mazzola at the phone number listed on the cover of this brochure supplement.

**Item 7: Requirements for State-Registered Advisers**

Michael Mazzola has not been involved in an arbitration award and has not been found liable in an arbitration claim alleging damages in excess of \$2,500. Mr. Mazzola has not

been involved in any award or found liable in any civil, self-regulatory organization, or administrative proceeding. Mr. Mazzola has not been the subject of a bankruptcy petition.

## **Item 2: Education and Background and Business Experience**

**Individual Full Name, Title or Designation:** Michael Vissotski

**Years of Experience:** 26

**Education:**

- Macomb College, Liberal Arts
- Wayne State University, Engineering

**Business Background**

- 2009 to present, VIMA, LLC, Managing Member
- 2003-2009, UBS Financial Services, Inc., Financial Advisor
- 1996-2003, Morgan Stanley Dean Witter, Financial Advisor

## **Item 3: Disciplinary Information**

Michael Vissotski does not have any legal, civil, criminal, regulatory, or disciplinary history to report at this time.

## **Item 4 and 5: Other Business Activities and Additional Compensation**

Mr. Vissotski does not have any outside business activities to report.

## **Item 6: Supervision**

Michael Mazzola remains responsible for the supervision of each employee of the firm. This supervision extends to reviewing their business practices and monitoring the advice given to clients. Questions related to the activities of any employee may be directed to Mr. Mazzola at the phone number listed on the cover of this brochure supplement.

## **Item 7: Requirements for State-Registered Advisers**

Michael Vissotski has not been involved in an arbitration award and has not been found liable in an arbitration claim alleging damages in excess of \$2,500. Mr. Vissotski has not been involved in any award or found liable in any civil, self-regulatory organization, or administrative proceeding. Mr. Vissotski has not been the subject of a bankruptcy petition.



## **Item 2: Education and Background and Business Experience**

**Individual Full Name, Title or Designation:** Michel S. Tenaglia

**Years of Experience:** 21

**Education:**

- Michigan State, B.A. Financial Administration, 1991

**Business Background**

- 2011 to present, VIMA, LLC
- 2009-2011, America Group RSC, Financial Advisor
- 2001-2009, Morgan Stanley Dean Witter, Financial Advisor
- 1994-2001 Oakwood & companies, Financial Officer
- 1991-1994 Tenaglia Construction, Carpenter

## **Item 3: Disciplinary Information**

Michel Tenaglia does not have any legal, civil, criminal, regulatory, or disciplinary history to report at this time.

## **Item 4 and 5: Other Business Activities and Additional Compensation**

Mr. Tenaglia is independently licensed to sell insurance and annuity products through various insurance companies. When acting in this capacity, he will receive commissions for selling insurance and annuity products.

Mr. Tenaglia may also receive other incentive awards for the recommendation/sale of annuities and other insurance products. The receipt of compensation and other incentive benefits may affect the judgment of Mr. Tenaglia when recommending products to clients. While he endeavors at all times to put the interest of his clients first as a part of VIMA's overall fiduciary duty to clients, clients should be aware that the receipt of commissions and additional compensation itself creates a conflict of interest, and may affect Mr. Tenaglia's decision making process when making recommendations.

Clients are never obligated or required to purchase insurance products from or through Mr. Tenaglia and may choose any independent insurance agent and insurance company to purchase insurance products. Regardless of the insurance agent selected, the insurance agent or agency will receive normal commissions from the sale.

## **Item 6: Supervision**

Michael Mazzola remains responsible for the supervision of each employee of the firm. This supervision extends to reviewing their business practices and monitoring the advice

given to clients. Questions related to the activities of any employee may be directed to Mr. Mazzola at the phone number listed on the cover of this brochure supplement.

<b>Item 7: Requirements for State-Registered Advisers</b>
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Michel Tenaglia has not been involved in an arbitration award and has not been found liable in an arbitration claim alleging damages in excess of \$2,500. Mr. Tenaglia has not been involved in any award or found liable in any civil, self-regulatory organization, or administrative proceeding. Mr. Tenaglia has not been the subject of a bankruptcy petition.

## **Item 2: Education and Background and Business Experience**

**Individual Full Name, Title or Designation:** Michael A. Maley

**Years of Experience:** 43

**Education:**

- Macomb Community College

**Business Background**

- July 2014 to present, VIMA, LLC.
- 2011-2014, Liberty Partners Financial Services LLC.
- 2001-2011, LPL Financial LLC.
- 1996-2001, Raymond James & Associates, Inc./Roney & Co.
- 1979-1996, Lehman Brothers Inc. /Smith Barney Inc.

## **Item 3: Disciplinary Information**

Mr. Maley does not have any legal, civil, criminal, regulatory, or disciplinary history to report at this time.

## **Item 4 and 5: Other Business Activities and Additional Compensation**

Mr. Maley does not have any outside business activities to report.

## **Item 6: Supervision**

Michael Mazzola remains responsible for the supervision of each employee of the firm. This supervision extends to reviewing their business practices and monitoring the advice given to clients. Questions related to the activities of any employee may be directed to Mr. Mazzola at the phone number listed on the cover of this brochure supplement.

## **Item 7: Requirements for State-Registered Advisers**

Michael Maley has not been involved in an arbitration award and has not been found liable in an arbitration claim alleging damages in excess of \$2,500. Mr. Maley has not been involved in any award or found liable in any civil, self-regulatory organization, or administrative proceeding. Mr. Maley has not been the subject of a bankruptcy petition.

## **Item 2: Education and Background and Business Experience**

**Individual Full Name, Title or Designation:** Sid Jamil

**Years of Experience:** 23

**Education:** Wayne State University, BS in Business Administration: Marketing Management

### **Business Background**

- January 2016 - Present, VIMA LLC
- 2014 – Raymond James & Associates, INC
- 2007 – 2014, Charles Schwab & CO. INC
- 2006 – 2014, E\*TRADE Securities LLC
- 2005 – 2006, Comerica Securities
- 1999 – 2004, Merrill Lynch

## **Item 3: Disciplinary Information**

Mr. Jamil has a disciplinary event to report. Please review FINRA's broker check for more detailed information.

## **Item 4 and 5: Other Business Activities and Additional Compensation**

Mr. Jamil is a licensed real estate agent.

## **Item 6: Supervision**

Michael Mazzola remains responsible for the supervision of each employee of the firm. This supervision extends to reviewing their business practices and monitoring the advice given to clients. Questions related to the activities of any employee may be directed to Mr. Mazzola at the phone number listed on the cover of this brochure supplement.

## **Item 7: Requirements for State-Registered Advisers**

Sid Jamil has not been involved in an arbitration award and has not been found liable in an arbitration claim alleging damages in excess of \$2,500. Mr. Jamil has not been involved in any award or found liable in any civil, self-regulatory organization, or administrative proceeding. Mr. Jamil has not been the subject of a bankruptcy petition.

## **Item 2: Education and Background and Business Experience**

**Individual Full Name, Title or Designation:** Marguerite Tschirhart

**Years of Experience:** 10

**Education:**

- College for Financial Planning, CFP Program, Presently Enrolled
- Michigan State University College of Law, Juris Doctor, 1995
- Michigan State University, B.A., Pre-Law Public Policy, 1987

**Business Background**

- 2017 to Present, VIMA, LLC, Financial Advisor
- 2015 -2017, Valic Financial Advisors, Financial Advisor
- 2012-2015, Wells Fargo Advisors LLC., Financial Advisor

## **Item 3: Disciplinary Information**

Mrs. Tschirhart does not have any legal, civil, criminal, regulatory, or disciplinary history to report at this time.

## **Item 4 and 5: Other Business Activities and Additional Compensation**

Marguerite Tschirhart is licensed to practice law in Michigan.

Mrs. Tschirhart is also independently licensed to sell Life, Accident & Health insurance and annuity products through various insurance companies. When acting in this capacity, she will receive commissions for selling insurance and annuity products.

Mrs. Tschirhart may also receive other incentive awards for the recommendation/sale of annuities and other insurance products. The receipt of compensation and other incentive benefits may affect the judgment of when recommending products to clients. While she endeavors at all times to put the interest of his clients first as a part of VIMA's overall fiduciary duty to clients, clients should be aware that the receipt of commissions and additional compensation itself creates a conflict of interest, and may affect Mrs. Tschirhart decision making process when making recommendations.

Clients are never obligated or required to purchase insurance products from or through Mrs. Tschirhart and may choose any independent insurance agent and insurance company to purchase insurance products. Regardless of the insurance agent selected, the insurance agent or agency will receive normal commissions from the sale.

### **Item 6: Supervision**

Michael Mazzola remains responsible for the supervision of each employee of the firm. This supervision extends to reviewing their business practices and monitoring the advice given to clients. Questions related to the activities of any employee may be directed to Mr. Mazzola at the phone number listed on the cover of this brochure supplement.

### **Item 7: Requirements for State-Registered Advisers**

Marguerite Tschirhart has not been involved in an arbitration award and has not been found liable in an arbitration claim alleging damages in excess of \$2,500. Mrs. Tschirhart has not been involved in any award or found liable in any civil, self-regulatory organization, or administrative proceeding. Mrs. Tschirhart has not been the subject of a bankruptcy petition.

## **Item 2: Education and Background and Business Experience**

**Individual Full Name, Title or Designation:** James H. Waugh

**Years of Experience:** 28

**Education:** BA, Cum Laude, Wayne State University

JD, Cum Laude, Wayne State University

Member, State Bar of Michigan

Member, Phi Beta Kappa Honorary Society

### **Business Background**

- November 2018-Present, VIMA, LLC, Financial Advisor
- October 2016 -October 2018, Citizens Securities., Financial Advisor
- May 2015-August 2016, LPL Financial LLC, Financial Advisor
- December 2014-February 2015, Global Financial Private Capital, Financial Advisor
- August 2014-December 2014, Estate Planning & Preservation, Financial Advisor
- September 2012-March 2014-Kuttin-Mettis Wealth Management, Financial Advisor
- August 1994-September 2012-Ameriprise Financial Advisors, Financial Advisor

## **Item 3: Disciplinary Information**

Mr. Waugh does not have any legal, civil, criminal, regulatory, or disciplinary history to report at this time.

## **Item 4 and 5: Other Business Activities and Additional Compensation**

Mr. Waugh is independently licensed to sell insurance and annuity products through various insurance companies. When acting in this capacity, he will receive commissions for selling insurance and annuity products.

Mr. Waugh may also receive other incentive awards for the recommendation/sale of annuities and other insurance products. The receipt of compensation and other incentive benefits may affect the judgment of Mr. Waugh when recommending products to clients. While he endeavors at all times to put the interest of his clients first as a part of VIMA's

overall fiduciary duty to clients, clients should be aware that the receipt of commissions and additional compensation itself creates a conflict of interest and may affect Mr. Waugh's decision-making process when making recommendations.

Clients are never obligated or required to purchase insurance products from or through Mr. Waugh and may choose any independent insurance agent and insurance company to purchase insurance products. Regardless of the insurance agent selected, the insurance agent or agency will receive normal commissions from the sale.

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

Michael Mazzola remains responsible for the supervision of each employee of the firm. This supervision extends to reviewing their business practices and monitoring the advice given to clients. Questions related to the activities of any employee may be directed to Mr. Mazzola at the phone number listed on the cover of this brochure supplement.

#### **Item 7: Requirements for State-Registered Advisers**

James Waugh has not been involved in an arbitration award and has not been found liable in an arbitration claim alleging damages in excess of \$2,500. Mr. Waugh has not been involved in any award or found liable in any civil, self-regulatory organization, or administrative proceeding. Mr. Waugh has not been the subject of a bankruptcy petition.



## **Item 2: Education and Background and Business Experience**

**Individual Full Name, Title or Designation:** Michael A. Olson

**Years of Experience:** 24

**Education:** BA, Economics, University of Arizona

### **Business Background**

- July 2019-Present, VIMA, LLC, Financial Advisor
- May 2011-November 2018, Signator Investors, Inc., Financial Advisor
- November 2009-July 2010, New England Securities, Financial Advisor
- May 2002-September 2005, Financial Network Investment Corp, Financial Advisor
- April 2001-April 2002, Securian Financial Services, Inc, Financial Advisor
- June 1999-July 2000, Vanguard Marketing Corporation, Financial Advisor

## **Item 3: Disciplinary Information**

Mr. Olson does not have any legal, civil, criminal, regulatory, or disciplinary history to report at this time.

## **Item 4 and 5: Other Business Activities and Additional Compensation**

Mr. Olson is independently licensed to sell insurance and annuity products through various insurance companies. When acting in this capacity, he will receive commissions for selling insurance and annuity products.

Mr. Olson may also receive other incentive awards for the recommendation/sale of annuities and other insurance products. The receipt of compensation and other incentive benefits may affect the judgment of Mr. Olson when recommending products to clients. While he endeavors at all times to put the interest of his clients first as a part of VIMA's overall fiduciary duty to clients, clients should be aware that the receipt of commissions and additional compensation itself creates a conflict of interest, and may affect Mr. Olson's decision making process when making recommendations.

Clients are never obligated or required to purchase insurance products from or through Mr. Olson and may choose any independent insurance agent and insurance company to

purchase insurance products. Regardless of the insurance agent selected, the insurance agent or agency will receive normal commissions from the sale.

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

Michael Mazzola remains responsible for the supervision of each employee of the firm. This supervision extends to reviewing their business practices and monitoring the advice given to clients. Questions related to the activities of any employee may be directed to Mr. Mazzola at the phone number listed on the cover of this brochure supplement.

#### **Item 7: Requirements for State-Registered Advisers**

Michael Olson has not been involved in an arbitration award and has not been found liable in an arbitration claim alleging damages in excess of \$2,500. Mr. Olson has not been involved in any award or found liable in any civil, self-regulatory organization, or administrative proceeding. Mr. Olson has not been the subject of a bankruptcy petition in the last 10 years.

## Item 2: Education and Background and Business Experience

### Individual Full Name, Title or Designation:

Matthew R. Doering

### Years of Experience: 23

### Education:

3 years at Vincennes University

### Business Background

		Name of Company	Location	Position
03/2020	PRESENT	VIMA, LLC		FINANCIAL ADVISOR
03/2019	03/2020	Thurston Springer	Troy, MI United States Bloomington, IN United States	FINANCIAL ADVISOR
11/2010	01/2019	ECAVARO JONES		FINANCIAL ADVISOR
07/2005	11/2010	CHASE INVESTMENT SERVICES CORP.	ST. LOUIS, MO United States	MASS TRANSFER
01/2005	07/2005	BOSC	CHICAGO, IL United States	FA
06/2003	02/2005	LEGEND EQUITIES CORPORATIO	BEDFORD, IN United States PALM BEACH GARDENS, FL United States	REGISTERED REPRESENTATIVE
05/1999	06/2003	A. c. EDWARDS & SONS, INC.	BLOOMINGTON, IN United States	REGISTERED REP

## Item 3: Disciplinary Information

Mr. Doering does not have any legal, civil, criminal, regulatory, or disciplinary history to report at this time.

## Item 4 and 5: Other Business Activities and Additional Compensation

Mr. Doering is independently licensed to sell insurance and annuity products through various insurance companies. When acting in this capacity, he will receive commissions for selling insurance and annuity products.

Mr. Doering may also receive other incentive awards for the recommendation/sale of annuities and other insurance products. The receipt of compensation and other incentive benefits may affect the judgment of Mr. Doering when recommending products to clients. While he endeavors at all times to put the interest of his clients first as a part of VIMA's overall fiduciary duty to clients, clients should be aware that the receipt of commissions and additional compensation itself creates a conflict of interest, and may affect Mr. Doering decision making process when making recommendations.

Clients are never obligated or required to purchase insurance products from or through Mr. Doering and may choose any independent insurance agent and insurance company to purchase insurance products. Regardless of the insurance agent selected, the insurance agent or agency will receive normal commissions from the sale.

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

Michael Mazzola remains responsible for the supervision of each employee of the firm. This supervision extends to reviewing their business practices and monitoring the advice given to clients. Questions related to the activities of any employee may be directed to Mr. Mazzola at the phone number listed on the cover of this brochure supplement.

#### **Item 7: Requirements for State-Registered Advisers**

Mr. Doering has not been involved in an arbitration award and has not been found liable in an arbitration claim alleging damages in excess of \$2,500. Mr. Doering has not been involved in any award or found liable in any civil, self-regulatory organization, or administrative proceeding. Mr. Doering has not been the subject of a bankruptcy petition.

## **Item 2: Education and Background and Business Experience**

**Individual Full Name, Title or Designation:** Dennis M Prost, CFP

### **Education:**

- CFP -Designation College of Financial planning, Denver, CO – 1993
- MBA, Central Michigan University, Mount Pleasant, MI – 1990
- BS Health Services Management & Business Administration, Ferris State College, Big Rapids, MI – 1985

### **Business Background**

- 2022 – Present, VIMA, LLC, Investment Adviser Representative
- 2020 – 2022, PVG Asset Management, Corp, Investment Advisor Representative
- 2014 – 2020, Harvest Investment Services, LLC, Adviser Representative
- 1997 – 2018, ProEquities, Inc, Registered Representative
- 1994 – 1997, Mariner Financial, Broker
- 1989 – 1993, Equitable Life Assurance Company, Broker

## **Item 3: Disciplinary Information**

Mr. Prost does not have any legal, civil, criminal, regulatory, or disciplinary history to report at this time.

## **Item 4 and 5: Other Business Activities and Additional Compensation**

Mr. Prost does not have any outside business activities to report.

## **Item 6: Supervision**

Michael Mazzola remains responsible for the supervision of each employee of the firm. This supervision extends to reviewing their business practices and monitoring the advice given to clients. Questions related to the activities of any employee may be directed to Mr. Mazzola at the phone number listed on the cover of this brochure supplement.

## **Item 7: Requirements for State-Registered Advisers**

Dennis Prost has not been involved in an arbitration award and has not been found liable in an arbitration claim alleging damages in excess of \$2,500. Mr. Prost has not been involved in any award or found liable in any civil, self-regulatory organization, or administrative proceeding. Mr. Prost has not been the subject of a bankruptcy petition.

## **Item 2: Education and Background and Business Experience**

**Individual Full Name, Title or Designation:** David C. Roberts, CFP®, CPWA®

### **Education**

- Certified Private Wealth Advisor® Program, Yale University School of Management
- MBA, Finance, DePaul University
- MS, Healthcare Services and Management Policy, Finance, School of Medicine, Ohio State University
- BA, Economics, Ohio State University

### **Personal Credentials- Designations and Licenses**

- CERTIFIED FINANCIAL PLANNER™, CFP® (1993)
- Certified Private Wealth Advisor®, CPWA®
- Chartered Retirement Planning Counselor™, CRPC®
- Accredited Asset Management Specialist™, AAMS®
- Accredited Portfolio Management Advisor™, APMA®

### **Business Background**

- 2020 – Present, VIMA, LLC, Investment Adviser Representative
- 2016 – Present, Zeiders Enterprise, Agent
- 2019 – 2020, Financial Strategies Group, Inc., Financial Planner
- 2016 – 2019, Minnesota Life, Agent
- 2016 – 2019, Securian Financial Group, Agent
- 2016 – 2019, Securian Financial Services Inc., Registered Representative
- 2015 – 2016, Waddell & Reed Inc., Associated Person
- 2015 – 2015, Mass Mutual Life Insurance Company, Agent
- 2015 – 2015, MML Investors Services, Registered Representative
- 2011 – 2015, Investment Solutions Advisors, LLC, Investment Adviser Representative
- 2010 – 2011, Valic Financial Advisors, Registered Representative
- 2010 – 2010, Pruco Securities, LLC, Career Development Program FSA
- 2010 – 2010, The Prudential Insurance Company Of America, Career Development Program - FSA

## **Item 3: Disciplinary Information**

Mr. Roberts does not have any legal, civil, criminal, regulatory, or disciplinary history to report at this time.

#### **Item 4 and 5: Other Business Activities and Additional Compensation**

Mr. Roberts is a financial counsel at Zeiders Enterprises.

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

Michael Mazzola remains responsible for the supervision of each employee of the firm. This supervision extends to reviewing their business practices and monitoring the advice given to clients. Questions related to the activities of any employee may be directed to Mr. Mazzola at the phone number listed on the cover of this brochure supplement.

#### **Item 7: Requirements for State-Registered Advisers**

David C. Roberts has not been involved in an arbitration award and has not been found liable in an arbitration claim alleging damages in excess of \$2,500. Mr. Roberts has not been involved in any award or found liable in any civil, self-regulatory organization, or administrative proceeding. Mr. Roberts has not been the subject of a bankruptcy petition.