



Firm Brochure

Form ADV Part 2A

MARCH 21, 2023

This Brochure provides information about the qualifications and business practices of Simaris Financial, "Simaris". If you have any questions about the contents of this Brochure, please contact us at (512) 298-2085. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Simaris Financial is registered as an Investment Adviser with the State of Texas. Registration of an Investment Advisor does not imply any level of skill or training.

Additional information about Simaris is available on the SEC's website at: www.adviserinfo.sec.gov which can be found using the firm's identification number 300386.

Austin, Texas • 512 – 298 – 2085

simaris.co



material changes

The last annual update of this Brochure was filed on March 24, 2022. Since then, the following changes have been made:

The language for Ongoing Financial Planning fees has been updated. Please see Item 5 for additional information.

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

table of contents

<p>1 Cover Page</p>	<p>6 Performance-Based Fees + Side-by-Side Management</p>	<p>11 Code of Ethics, Participation or Interest in Client Transactions and Personal Trading</p>	<p>16 Investment Discretion</p>
<p>2 Material Changes</p>	<p>7 Types of Clients</p>	<p>12 Brokerage Practices</p>	<p>17 Voting Client Securities</p>
<p>3 Table of Contents</p>	<p>8 Methods of Analysis, Investment Strategies + Risk of Loss</p>	<p>13 Review of Accounts</p>	<p>18 Financial Information</p>
<p>4 Advisory Business</p>	<p>9 Disciplinary Information</p>	<p>14 Client Referrals and Other Compensation</p>	<p>19 Requirements for State-Registered Advisers</p>
<p>5 Fees + Compensation</p>	<p>10 Other Financial Industry Activities + Affiliations</p>	<p>15 Custody</p>	

advisory business



Description of Advisory Firm

Simaris Financial is registered as an Investment Adviser with the State of Texas. Simaris and Ross Patterson are registered with the State of Texas. Ross Patterson is the principal owner of Simaris. Simaris reports \$5,279,903 discretionary and \$0 non-discretionary Assets Under Management. Assets Under Management were calculated as of December 31, 2022.

Types of Advisory Services → Portfolio Management Services

We offer discretionary and non-discretionary portfolio management services that are based on the individual needs of the client. If you retain our firm for portfolio management services, we will meet with you to determine your investment objectives, risk tolerance, and other relevant information at the beginning of our advisory relationship. We will use the information we gather to develop a strategy that enables our firm to give you continuous and focused investment advice and/or to make investments on your behalf. As part of our portfolio management services, we may customize an investment portfolio for you according to your risk tolerance and investing objectives.

Once we construct an investment portfolio for you we will monitor your portfolio's performance on an ongoing basis, and will rebalance the portfolio as required by changes in market conditions and in your financial circumstances. Account supervision is guided by the stated objectives of the client (e.g., maximum capital appreciation, growth, income, or growth and income), as well as tax considerations. Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors. Fees pertaining to this service are outlined in Item 5 of this brochure.

If you participate in our discretionary portfolio management services, we require you to grant our firm discretionary authority to manage your account. Discretionary authorization will allow us to determine the specific securities, and the amount of securities, to be purchased or sold for your account without your approval prior to each transaction. Discretionary authority is typically granted by the investment advisory agreement you sign with our firm and the appropriate trading authorization forms. You may limit our discretionary authority (for example, limiting the types of securities that can be purchased or sold for your account) by providing our firm with your restrictions and guidelines in writing.

If you enter into non-discretionary arrangements with our firm, we must obtain your approval prior to executing any transactions on behalf of your account. You have an unrestricted right to decline to implement any advice provided by our firm on a non-discretionary basis.

Types of Advisory Services

Investment Advisory Services

We also offer investment advisory services through use of third-party money managers (“Outside Managers” and “Sub-Advisers”) for portfolio management services. We assist clients in selecting an appropriate allocation model, completing the Outside Manager’s investor profile questionnaire, interacting with the Outside Manager and reviewing the Outside Manager. Our review process and analysis of outside managers is further discussed in Item 8 of this Form ADV Part 2A. Additionally, we will meet with the client on a periodic basis to discuss changes in their personal or financial situation, suitability, and any new or revised restrictions to be applied to the account.

Fees pertaining to this service are outlined in Item 5 of this brochure.

Types of Advisory Services

Financial Planning

We provide financial planning services on topics such as cash flow, debt management, college savings, work benefits, estate and incapacity planning, insurance and risk management, investment analysis, retirement planning, and strategic tax planning.



Types of Advisory Services

Financial Planning



Financial Planning is

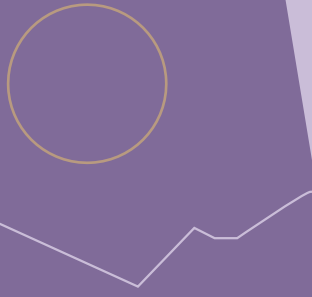
a comprehensive evaluation of a client's current and future financial circumstances by using currently known variables to predict future cash flows, asset values, and withdrawal plans. **The key defining aspect of financial planning is that through the financial planning process, all questions, information, and analysis will be considered as they affect and are affected by the entire financial and life situation of the client.**

Types of Advisory Services

Financial Planning

If you retain our firm for financial planning services,

we will meet with you to gather information about your financial circumstances and objectives. We may also use financial planning software to determine your current financial position and to define and quantify your long-term goals and objectives. Once we specify those long-term objectives (both financial and non-financial), we will develop shorter-term, targeted objectives. Once we review and analyze the information you provide to our firm and the data derived from our financial planning software, we will deliver a written plan to you, designed to help you achieve your stated financial goals and objectives.



Financial plans are based on your financial situation at the time we present the plan to you, and on the financial information you provide to us. You must promptly notify our firm if your financial situation, goals, objectives, or needs change.

Types of Advisory Services —————> Financial Planning

Topics Covered (1/3)

In general, the financial plan will address any or all of the following areas of concern. The client and advisor will work together to select the specific areas to cover. These areas may include, but are not limited to, the following:

Retirement Planning

Our retirement planning services include projections of your likelihood of achieving your financial goals, typically focusing on financial independence as the primary objective.

For situations where projections show less than the desired results, we may make recommendations, including those that may impact the original projections by adjusting certain variables (e.g., working longer, saving more, spending less, taking more risk with investments). If you are near retirement or already retired, advice may be given on appropriate distribution strategies to minimize the likelihood of running out of money or having to adversely alter spending during your retirement years.

Investment Analysis

We may develop an asset allocation strategy to meet your financial goals and risk tolerance, providing information on investment vehicles and strategies, reviewing employee stock options, as well as assisting you in establishing your own investment account at a selected broker/dealer or custodian. The strategies and types of investments we may recommend are further discussed in Item 8 of this brochure.

Types of Advisory Services —————> Financial Planning

Topics Covered (2/3)

Tax Planning Strategies

We may suggest ways to minimize current and future income taxes as a part of your overall financial planning picture.

For situations where projections show less than the desired results, we may make recommendations, including those that may impact the original projections by adjusting certain variables (e.g., working longer, saving more, spending less, taking more risk with investments). If you are near retirement or already retired, advice may be given on appropriate distribution strategies to minimize the likelihood of running out of money or having to adversely alter spending during your retirement years.


We recommend that you consult with a qualified tax professional before initiating any tax planning strategy, and we may provide you with contact information for accountants or attorneys who specialize in this area if you wish to hire someone for such purposes. We will participate in meetings or phone calls between you and your tax professional with your approval.

Financial Goals

We will help you identify financial goals and develop a plan to reach them. We will identify what you plan to accomplish, what resources you will need to make it happen, how much time you will need to reach the goal, and how much you should budget for your goal

Estate Planning

We will analyze your exposure to estate taxes and your current estate plan, which may include whether you have a will, powers of attorney, trusts, and other related documents. Our advice also typically includes ways for you to minimize or avoid future estate taxes by implementing appropriate estate planning strategies such as the use of applicable trusts.

 *We always recommend that you consult with a qualified attorney when you initiate, update, or complete estate planning activities. We may provide you with contact information for attorneys who specialize in estate planning when you wish to hire an attorney for such purposes. From time-to-time, we will participate in meetings or phone calls between you and your attorney with your approval or request.*

Insurance + Risk Management

We will review existing insurance policies to ensure proper coverage for life, health, disability, long-term care, liability, home, and automobile. In addition, a risk management review includes an analysis of your exposure to major risks that could have a significant adverse impact on your financial picture, such as premature death, disability, property and casualty losses, or the need for long-term care planning. We may advise you on ways to minimize such risks and about weighing the costs and benefits of purchasing insurance and, likewise, the potential cost of not purchasing insurance (“self-insuring”).

Types of Advisory Services



Financial Planning

Topics Covered (3/3)

Cash Flow + Debt Management

We will review your income and expenses to determine your current surplus or deficit along with give advice on using any surplus funds to meet priorities or reducing expenses if they exceed your income. Advice may also be provided on which debts to pay off first based on factors such as the interest rate of the debt and any income tax ramifications. We may also recommend what we believe to be an appropriate cash reserve that should be considered for emergencies and other financial goals, along with a review of accounts (such as money market funds) for such reserves, plus strategies to save desired amounts.

Business Planning

We provide consulting services for Clients who currently operate their own business, are considering starting a business, or are planning for an exit from their current business. Under this type of engagement, we work with you to assess your current situation, identify your objectives, and develop a plan aimed at achieving your goals.

College Savings

We will project the amount that will be needed to achieve college or other post-secondary education funding goals, along with provide advice on ways for you to save the desired amount. We will recommend savings strategies and, if needed, we will determine your eligibility for financial aid or the best way to contribute to grandchildren (if appropriate).

Employer Benefits Optimization

We will review and analyze your use of your employee benefits, and recommend ways you can take the maximum advantage possible of your employee benefits. If you are a business owner, we will consider and/or recommend the various benefit programs that can be structured to meet both business and personal retirement goals.

Types of Advisory Services

Ongoing Financial Planning

This service involves working one-on-one with a planner over an extended period of time.

By paying a fixed monthly fee, you receive continuous access to planner who will work with you to design and implement a personalized financial plan (see Financial Planning section above). The planner will monitor the plan, recommend any changes and ensure the plan is up to date.



Client Tailored Services + Client Imposed Restrictions

We offer the same suite of services to all of our clients.

However, specific client financial plans and their implementation are dependent upon the client Investment Policy Statement which outlines each client's current situation (income, tax levels, and risk tolerance levels) and is used to construct a client specific plan to aid in the selection of a portfolio that matches restrictions, needs, and targets.

Employee Benefit Plan Services

Our firm provides employee benefit plan services to employer plan sponsors on an ongoing basis.

Generally, such services consist of assisting employer plan sponsors in establishing, monitoring and reviewing their company's participant-directed retirement plan. As the needs of the plan sponsor dictate, areas of advising will include developing and delivering an investment policy statement as well as discussing investment options, plan structure, and participant education.

In providing employee benefit plan services, our firm does not provide any advisory services with respect to the following types of assets: employer securities, real estate (excluding real estate funds and publicly traded REITS), participant loans, non-publicly traded securities or assets, other illiquid investments, or brokerage window programs (collectively, "Excluded Assets").

Wrap Fee Programs

We do not participate in wrap fee programs.

Retirement Account Advice

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts.

The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours.

Under this special rule's provisions, we must:

Meet a professional standard of care when making investment recommendations (give prudent advice);

Never put our financial interests ahead of yours when making recommendations (give loyal advice);

Avoid misleading statements about conflicts of interest, fees, and investments;

Follow policies and procedures designed to ensure that we give advice that is in your best interest;

Charge no more than is reasonable for our services;

Give you basic information about conflicts of interest."

fees + compensation

Unless a client has received the firm's disclosure brochure at least 48 hours prior to signing the investment advisory contract, the investment advisory contract may be terminated by the client within five (5) business days of signing the contract without incurring any advisory fees. How we are paid depends on the type of advisory service we are performing. Please review the fee and compensation information in this section.

Portfolio Management Services

Our standard advisory fee is based on the market value of the assets under management and is calculated as follows:

up to \$1M in assets



**annual fee of
0.60%**

(of the amount below \$1M)

\$1,000,001+ in assets



**annual fee of
0.40%**

(of the amount over \$1M)

Portfolio Management Services

All clients engaging in Portfolio Management Services must also engage in Ongoing Financial Planning.

The annual fees are negotiable and are pro-rated and paid in arrears on a quarterly basis. The advisory fee is a tiered fee and is calculated by assessing the percentage rates using the predefined levels of assets as shown in the above chart and applying the fee to the account value as of the last day of the previous quarter, resulting in a combined weighted fee. For example, an account valued at \$2,000,000 would pay an effective fee of 0.5% with an annual fee of \$10,000 (a quarterly fee of \$2,500).

Portfolio management fees are directly debited from client accounts. Accounts initiated or terminated during a calendar quarter will be charged a pro-rated fee based on the amount of time remaining in the billing period. An account may be terminated with written notice at least 30 calendar days in advance. Since fees are paid in arrears, no rebate will be needed upon termination of the account.

No increase in the annual fee shall be effective without agreement from the client by signing a new agreement or amendment to their current advisory agreement.



Financial Planning Fixed Fee

Financial Planning will generally be offered on a fixed fee basis. The fixed fee for a financial plan is \$3600, and is negotiable in some cases.

The fixed fee will be agreed upon before the start of any work. If a fixed fee program is chosen, the fee is due upon engagement, however, we will not bill an amount above \$500 more than 6 months in advance of service. In the event of early termination, the client will be billed for the hours worked at a rate of \$300 per hour, and the client will be refunded the difference. Fees for this service may be paid by electronic funds transfer or check.

If you choose to participate in Ongoing Financial Planning after having engaged in this service, your fee will be applied to the initial upfront charge.

Ongoing Financial Planning

Ongoing Financial Planning consists of an upfront charge of \$3600 and an ongoing fee that is paid monthly, in advance, at the rate of \$200 per month.

The ongoing fee begins three months after the initial upfront charge. The upfront and ongoing fees may be negotiable in certain cases. This service may be terminated with 30 days' notice. In the event of termination, the client will be billed for the hours worked at a rate of \$300 per hour, and the client will be refunded the difference. Fees for this service may be paid by electronic funds transfer or check.

The upfront portion of the Ongoing Financial Planning fee is for client onboarding, data gathering, and setting the basis for the financial plan. This work will commence immediately after the fee is paid, and will be completed within the first 90 days of the date the fee is paid. Therefore, the upfront portion of the fee will not be paid more than 6 months in advance.

The ongoing fee will be waived for 12 months for clients participating in our Portfolio Management Service.



Employee Plan Benefit Services

Our standard advisory fee for employee benefit plan services is based on the market value of the plans assets and is calculated as follows:

up to \$20M in assets \longrightarrow 0.50%
annual fee

\$20,000,001 + \longrightarrow 0.50%
annual fee

We will be compensated for Employee Benefit Plan services according to the value of plan assets. The fee is not negotiable.

This does not include fees to other parties, such as RecordKeepers, Custodians, Third-Party-Administrators.

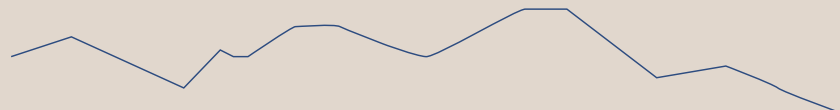
Fees for this service are paid in arrears and are either paid directly by the plan sponsor via ACH or check or deducted directly from the plan assets by the Custodian on a monthly basis, and our firm's fee is remitted to us.

Other Types of Fees and Expenses

As part of our investment advisory services to you, we may invest, or recommend that you invest, in mutual funds and exchange traded funds.

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 or exchange traded funds, which are described in each fund's prospectus to their shareholders. These fees will generally include a management fee and other fund expenses. You will also incur transaction charges and/or brokerage fees when purchasing or selling securities. These charges and fees are typically imposed by the broker-dealer or custodian through whom your account transactions are executed. We do not share in any portion of the brokerage fees/transaction charges imposed by the broker-dealer or custodian.

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. Item 12 further describes the factors that we consider in selecting or recommending broker-dealers for client's transactions and determining the reasonableness of their compensation (e.g., commissions). We do not accept compensation for the sale of securities or other investment products including asset-based sales charges or service fees from the sale of mutual funds.



performance- based fees *and* side-by-side management

We do not offer performance-based fees and do not engage in side-by-side management.

types of clients



We provide financial planning and portfolio management services to individuals and high net-worth individuals.

We do not have a minimum account size requirement.

methods *of* analysis, investment strategies *and* risk *of* loss



Passive Investment Management

We primarily practice passive investment management.



Passive investing involves building portfolios that are comprised of various distinct asset classes. The asset classes are weighted in a manner to achieve the desired relationship between correlation, risk, and return. Funds that passively capture the returns of the desired asset classes are placed in the portfolio. The funds that are used to build passive portfolios are typically index mutual funds or exchange traded funds.

Passive investment management is characterized by low portfolio expenses (i.e. the funds inside the portfolio have low internal costs), minimal trading costs (due to infrequent trading activity), and relative tax efficiency (because the funds inside the portfolio are tax efficient and turnover inside the portfolio is minimal).

In contrast, active management involves a single manager or managers who employ some method, strategy or technique to construct a portfolio that is intended to generate returns that are greater than the broader market or a designated benchmark. Academic research indicates most active managers underperform the market.

Fundamental Investment Analysis



In some cases, fundamental analysis may be included to guide investment decisions.



Fundamental analysis involves analyzing individual companies and their industry groups, such as a company's financial statements, details regarding the company's product line, the experience, and expertise of the company's management, and the outlook for the company's industry. The resulting data is used to measure the true value of the company's stock compared to the current market value. The risk of fundamental analysis is that information obtained may be incorrect and the analysis may not provide an accurate estimate of earnings, which may be the basis for a stock's value. If securities prices adjust rapidly to new information, utilizing fundamental analysis may not result in favorable performance.

Material Risks Involved

All investing strategies we offer involve risk and may result in a loss of your original investment which you should be prepared to bear.

Many of these risks apply equally to stocks, bonds, commodities and any other investment or security. Material risks associated with our investment strategies are listed below.

Market Risk

Market risk involves the possibility that an investment's current market value will fall because of a general market decline, reducing the value of the investment regardless of the operational success of the issuer's operations or its financial condition.

Turnover Risk

At times, the strategy may have a portfolio turnover rate that is higher than other strategies. A high portfolio turnover would result in correspondingly greater brokerage commission expenses and may result in the distribution of additional capital gains for tax purposes. These factors may negatively affect the account's performance.

Legal or Legislative Risk

Legislative changes or Court rulings may impact the value of investments, or the securities' claim on the issuer's assets and finances.

Strategy Risk

The Adviser's investment strategies and/or investment techniques may not work as intended.

Limited Markets

Certain securities may be less liquid (harder to sell or buy) and their prices may at times be more volatile than at other times. Under certain market conditions we may be unable to sell or liquidate investments at prices we consider reasonable or favorable or find buyers at any price.

Interest Rate Risk

Bond (fixed income) prices generally fall when interest rates rise, and the value may fall below par value or the principal investment. The opposite is also generally true: bond prices generally rise when interest rates fall. In general, fixed income securities with longer maturities are more sensitive to these price changes. Most other investments are also sensitive to the level and direction of interest rates.

Small + Medium Cap Company Risk

Securities of companies with small and medium market capitalizations are often more volatile and less liquid than investments in larger companies. Small and medium cap companies may face a greater risk of business failure, which could increase the volatility of the client's portfolio.

Concentration Risk

Certain investment strategies focus on particular asset-classes, industries, sectors or types of investment. From time to time these strategies may be subject to greater risks of adverse developments in such areas of focus than a strategy that is more broadly diversified across a wider variety of investments.

Inflation

Inflation may erode the buying power of your investment portfolio, even if the dollar value of your investments remains the same.

Risks Associated with Securities

Apart from the general risks outlined earlier which apply to all types of investments, specific securities may have other risks.

Commercial Paper

is, in most cases, an unsecured promissory note that is issued with a maturity of 270 days or less. Being unsecured, the risk to the investor is that the issuer may default.

Common Stocks

may go up and down in price quite dramatically and, in the event of an issuer's bankruptcy or restructuring, could lose all value. A slower-growth or recessionary economic environment could have an adverse effect on the price of all stocks.

Exchange Traded Funds

prices may vary significantly from the Net Asset Value due to market conditions. Certain Exchange Traded Funds may not track underlying benchmarks as expected. ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value; (ii) the ETF may employ an investment strategy that utilizes high leverage ratios; or (iii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. The Adviser has no control over the risks taken by the underlying funds in which client's invest.

Bank Obligations

including bonds and certificates of deposit may be vulnerable to setbacks or panics in the banking industry. Banks and other financial institutions are greatly affected by interest rates and may be adversely affected by downturns in the U.S. and foreign economies or changes in banking regulations.

Options + Other Derivatives

carry many unique risks, including time-sensitivity, and can result in the complete loss of principal. While covered call writing does provide a partial hedge to the stock against which the call is written, the hedge is limited to the amount of cash flow received when writing the option. When selling covered calls, there is a risk the underlying position may be called away at a price lower than the current market price.

Investment Companies Risk

When a client invests in open-end mutual funds or ETFs, the client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the client will incur higher expenses, many of which may be duplicative. In addition, the client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives).

Corporate Bonds

are debt securities to borrow money. Generally, issuers pay investors periodic interest and repay the amount borrowed either periodically during the life of the security and/or at maturity. Alternatively, investors can purchase other debt securities, such as zero coupon bonds, which do not pay current interest, but rather are priced at a discount from their face values and their values accrete over time to face value at maturity. The market prices of debt securities fluctuate depending on such factors as interest rates, credit quality, and maturity. In general, market prices of debt securities decline when interest rates rise and increase when interest rates fall. The longer the time to a bond's maturity, the greater its interest rate risk.

Municipal Bonds

are debt obligations generally issued to obtain funds for various public purposes, including the construction of public facilities. Municipal bonds pay a lower rate of return than most other types of bonds. However, because of a municipal bond's tax-favored status, investors should compare the relative after-tax return to the after-tax return of other bonds, depending on the investor's tax bracket. Investing in municipal bonds carries the same general risks as investing in bonds in general. Those risks include interest rate risk, reinvestment risk, inflation risk, market risk, call or redemption risk, credit risk, and liquidity and valuation risk.

disciplinary information



Criminal or Civil Actions

Simaris and its management have not been involved in any criminal or civil action.

Administrative Enforcement Proceedings

Simaris and its management have not been involved in administrative enforcement proceedings.

Self-Regulatory Organization Enforcement Proceedings

Simaris and its management have not been involved in legal or disciplinary events that are material to a client's or prospective client's evaluation of Simaris or the integrity of its management.

other financial industry activities + affiliations

No Simaris employee is registered, or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

No Simaris employee is registered, or have an application pending to register, as a futures commission merchant, commodity pool operator or a commodity trading advisor.

Simaris does not have any related parties. As a result, we do not have a relationship with any related parties.

Simaris only receives compensation directly from clients. We do not receive compensation from any outside source. We do not have any conflicts of interest with any outside party.



code of ethics, participation or interest in client transactions + personal trading

As a fiduciary, our firm and its associates have a duty of utmost good faith to act solely in the best interests of each client.

Our clients entrust us with their funds and personal information, which in turn places a high standard on our conduct and integrity. Our fiduciary duty is a core aspect of our Code of Ethics and represents the expected basis of all of our dealings. The firm also adheres to the Code of Ethics and Professional Responsibility adopted by the CFP® Board of

Standards Inc., and accepts the obligation not only to comply with the mandates and requirements of all applicable laws and regulations but also to take responsibility to act in an ethical and professionally responsible manner in all professional services and activities.

Code of Ethics Description

This code does not attempt to identify all possible conflicts of interest, and literal compliance with each of its specific provisions will not shield associated persons from liability for personal trading or other conduct that violates a fiduciary duty to advisory clients.

A summary of the Code of Ethics' Principles:

Integrity

Associated persons shall offer and provide professional services with integrity

Objectivity

Associated persons shall be objective in providing professional services to clients.

Competence

Associated persons shall provide services to clients competently and maintain the necessary knowledge and skill to continue to do so in those areas in which they are engaged.

Diligence

Associated persons shall act diligently in providing professional services

Fairness

Associated persons shall perform professional services in a manner that is fair and reasonable to clients, principals, partners, and employers, and shall disclose conflict(s) of interest in providing such services

Confidentiality

Associated persons shall not disclose confidential client information without the specific consent of the client unless in response to proper legal process, or as required by law

Professionalism

Associated persons' conduct in all matter shall reflect the credit of the profession

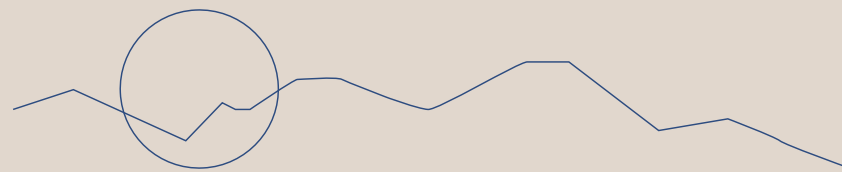
We periodically review and amend our Code of Ethics to ensure that it remains current, and we require all firm access persons to attest to their understanding of and adherence to the Code of Ethics at least annually. Our firm will provide of a copy of its Code of Ethics to any client or prospective client upon request.

Investment Recommendations Involving a Material Financial Interest + Conflicts of Interest

Neither our firm, its associates or any related person is authorized to recommend to a client or effect a transaction for a client, involving any security in which our firm or a related person has a material financial interest, such as in the capacity as an underwriter, adviser to the issuer, etc.

Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest

Our firm and its “related persons” may buy or sell securities similar to, or different from, those we recommend to clients for their accounts. In an effort to reduce or eliminate certain conflicts of interest involving the firm or personal trading, our policy may require that we restrict or prohibit associates’ transactions in specific reportable securities transactions. Any exceptions or trading pre-clearance must be approved by the firm principal in advance of the transaction in an account, and we maintain the required personal securities transaction records per regulation.



Trading Securities At/Around the Same Time as Client’s Securities

From time to time, our firm or its “related persons” may buy or sell securities for themselves at or around the same time as clients. We will not trade non-mutual fund securities 5 days prior to the same security for clients.

brokerage practices



Factors Used to Select Custodians and/or Broker-Dealers

Simaris Financial does not have any affiliation with Broker-Dealers. Specific custodian recommendations are made to the client based on their need for such services. We recommend custodians based on the reputation and services provided by the firm.

1 Research and Other Soft-Dollar Benefits

We currently do not receive soft dollar benefits.

2 Brokerage for Client Referrals

We receive no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

3 Clients Directing Which Broker/Dealer/Custodian to Use

We do recommend a specific custodian for clients to use, however, clients may custody their assets at a custodian of their choice. Clients may also direct us to use a specific broker-dealer to execute transactions. By allowing clients to choose a specific custodian, we may be unable to achieve most favorable execution of client transaction and this may cost clients money over using a lower-cost custodian.



The Custodian + Brokers We Use (TD Ameritrade)

Advisor participates in the TD Ameritrade Institutional program. TD Ameritrade Institutional is a division of TD Ameritrade, Inc. ("TD Ameritrade"), member FINRA/SIPC. TD Ameritrade is an independent [and unaffiliated] SEC-registered broker-dealer. TD Ameritrade offers to independent investment Advisors services which include custody of securities, trade execution, clearance, and settlement of transactions. Advisor receives some benefits from TD Ameritrade through its participation in the program. (Please see the disclosure under Item 14 below.)



Aggregating (Block) Trading for Multiple Client Accounts

Generally, we combine multiple orders for shares of the same securities purchased for advisory accounts we manage (this practice is commonly referred to as "block trading"). We will then distribute a portion of the shares to participating accounts in a fair and equitable manner. The distribution of the shares purchased is typically proportionate to the size of the account, but it is not based on account performance or the amount or structure of management fees. Subject to our discretion, regarding particular circumstances and market conditions, when we combine orders, each participating account pays an average price per share for all transactions and pays a proportionate share of all transaction costs. Accounts owned by our firm or persons associated with our firm may participate in block trading with your accounts; however, they will not be given preferential treatment.

review of accounts

Client accounts with the Portfolio Management Service will be reviewed regularly on a quarterly basis by Ross Patterson, Owner and CCO.



The account is reviewed with regards to the client's investment policies and risk tolerance levels. Events that may trigger a special review would be unusual performance, addition or deletions of client imposed restrictions, excessive draw-down, volatility in performance, or buy and sell decisions from the firm or per client's needs.

Clients will receive trade confirmations from the broker(s) for each transaction in their accounts as well as monthly or quarterly statements and annual tax reporting statements from their custodian showing all activity in the accounts, such as receipt of dividends and interest.

Simaris will provide written reports to Portfolio Management clients on a quarterly basis. We urge clients to compare these reports against the account statements they receive from their custodian.

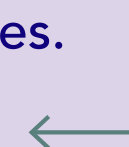
client referrals and other compensation



We do not receive any economic benefit, directly or indirectly, from any third party for advice rendered to our clients. Nor do we, directly or indirectly, compensate any person who is not advisory personnel for client referrals.

As disclosed under Item 12, Advisor participates in TD Ameritrade's institutional customer program and Advisor may recommend TD Ameritrade to Clients for custody and brokerage services.

There is no direct link between Advisor's participation in the program and the investment advice it gives to its Clients, although Advisor receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving Advisor participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to Advisor by third party vendors. TD



Ameritrade may also have paid for business consulting and professional services received by Advisor's related persons. Some of the products and services made available by TD Ameritrade through the program may benefit Advisor but may not benefit its Client accounts. These products or services may assist Advisor in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help Advisor manage and further develop its business enterprise. The benefits received by Advisor or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, Advisor endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by Advisor or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the Advisor's choice of TD Ameritrade for custody and brokerage services.

custody

Simaris does not accept custody of client funds except in the instance of withdrawing client fees.

For client accounts in which Simaris directly debits their advisory fee:

- i** Simaris will send a copy of its invoice to the custodian at the same time that it sends the client a copy.
- ii** The custodian will send at least quarterly statements to the client showing all disbursements for the account, including the amount of the advisory fee.that it sends the client a copy.
- iii** The client will provide written authorization to Simaris, permitting them to be paid directly for their accounts held by the custodian.

Clients should receive at least quarterly statements from the broker-dealer, bank or other qualified custodian that holds and maintains client's investment assets. We urge you to carefully review such statements and compare such official custodial records to the account statements or reports that we may provide to you. Our statements or reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

item 16

investment discretion

For those client accounts where we provide Investment Advisory Services, we maintain discretion over client accounts with respect to securities to be bought and sold and the amount of securities to be bought and sold. Investment discretion is explained to clients in detail when an advisory relationship has commenced. At the start of the advisory relationship, the client will execute a Limited Power of Attorney, which will grant our firm discretion over the account. Additionally, the discretionary relationship will be outlined in the advisory contract and signed by the client.

For those client accounts where we provide non-discretionary investment management services, we do not maintain discretion over client accounts with respect to securities to be bought and sold and the amount of securities to be bought and sold. This means we will require the client's direct authorization prior to making any changes to the client's account.

voting client securities



Simaris Financial does not vote Client proxies.

Therefore, Clients maintain exclusive responsibility for: (1) voting proxies, and (2) acting on corporate actions pertaining to the Client's investment assets. The Client shall instruct the Client's qualified custodian to forward to the Client copies of all proxies and shareholder communications relating to the Client's investment assets. If the client would like our opinion on a particular proxy vote, they may contact us at the number listed on the cover of this brochure.

In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward you any electronic solicitation to vote proxies.

financial information

Registered Investment Advisers are required in this Item to provide you with certain financial information or disclosures about our financial condition. We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to clients, and we have not been the subject of a bankruptcy proceeding.

We do not have custody of client funds or securities or require or solicit prepayment of more than \$500 in fees per client six months in advance.



requirements for state-registered advisors

Ross Patterson

YEAR OF BIRTH → 1966

FORMAL EDUCATION AFTER HIGH SCHOOL

2017

Certificate of Financial Planning,
University of Texas, Austin

1989

B.S. Microelectronic Engineering,
Rochester Institute of Technology



BUSINESS EXPERIENCE

JUN 2018 – PRESENT

Simaris Financial
Owner and CCO

DEC 2015 – FEB 2020

NXP Semiconductors
Design Verification Engineer

MAR 2011 – DEC 2015

Freescale Semiconductor
Design Verification Engineer

NOV 2009 – MAR 2011

Unemployed

AUG 1988 – DEC 2015

Freescale Semiconductor/Motorola
Design Verification Engineer
Factory Automation Engineer
Photolithography Engineer

PROFESSIONAL DESIGNATIONS CFP®

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States. To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- EDUCATION** Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- EXAMINATION** Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real-world circumstances;
- EXPERIENCE** Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- ETHICS** Agree to be bound by CFP Board’s Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.

PROFESSIONAL DESIGNATIONS —→ CFP®

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

CONTINUING EDUCATION

Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field;

and

ETHICS

Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.



Other Business Activities

Ross Patterson is not involved with outside business activities.

Performance-Based Fees

Simaris is not compensated by performance-based fees.

Material Disciplinary Disclosures

No management person at Simaris Financial has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

Material Relationships That Management Persons Have With Issuers of Securities

Simaris Financial, nor Ross Patterson, have any relationship or arrangement with issuers of securities.

Additional Compensation

Ross Patterson does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through SF.

Supervision

Ross Patterson, as Owner and Chief Compliance Officer of Simaris, is responsible for supervision. He may be contacted at the phone number on this brochure supplement.

Requirements for State-Registered Advisers

Ross Patterson has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.



Firm Brochure

Form ADV Part 2A



Brochure Supplemental *Form ADV Part 2B*

MARCH 21, 2023

Ross Patterson Individual CRD# 7071514
Managing Member and Chief Compliance Officer

This brochure supplement provides information about Ross Patterson that supplements the Simaris Financial ("Simaris") brochure. A copy of that brochure precedes this supplement. Please contact Ross Patterson if the Simaris brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Ross Patterson is available on the SEC's website at www.adviserinfo.sec.gov which can be found using the identification number 7071514.

educational background and business experience

Ross Patterson

YEAR OF BIRTH → 1966

FORMAL EDUCATION AFTER HIGH SCHOOL

2017

Certificate of Financial Planning,
University of Texas, Austin

1989

B.S. Microelectronic Engineering,
Rochester Institute of Technology

BUSINESS EXPERIENCE

JUN 2018 – PRESENT

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Factory Automation Engineer
Photolithography Engineer

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Item 3: Disciplinary Information

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Item 4: Other Business Activities

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Item 5: Additional Compensation

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Item 6: Supervision

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Item 7: Requirements for State-Registered Advisers

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