

Sims Investment Management, LLC

Form ADV-CRS (Customer Relationship Summary) Part 3

March 28, 2023

Item 1: Introduction

Sims Investment Management, LLC (“SIM”) is an investment adviser registered with the United States Securities and Exchange Commission. Such registration does not imply competence. Free and simple tools, and educational materials about broker-dealers, investment advisers, and investing are available to research SIM and financial professionals at <https://www.Investor.gov/CRS>.

Item 2: Relationships and Services

What investment services and advice can you provide to me?

It is important for you the customer to understand the difference in fees and services between brokerage firms and investment advisers.

Our services include investment advice and services to our clients who are typically individuals, pension and profit-sharing plans, corporations, and other business entities. SIM is a fee only (refer to Item 3) investment advisory. SIM analyzes, constructs, and manages customized investment portfolios based on the particular goals of each client in a manner which takes into account facts and information such as: income needs, liquidity requirements, investment time horizons, rate of return objective, tax considerations, risk tolerance and existing investments. SIM utilizes an array of investment vehicles including, but not limited to equity securities, warrants, debt securities, certificates of deposit, municipal securities, investment company securities, United States government securities, options contracts, hedge funds, private placements, insurance contracts and separately managed accounts. After we agree on an investment strategy, you grant us discretion (we determine for you) how we manage your account. Your account is custom-tailored to your specific investment objectives. We do not use “wrap programs” or other mass distribution programs. We manage accounts on a client-by-client basis, and often on an account-by-account basis.

The minimum account size is negotiable. There currently is no maximum. SIM manages client assets on either a discretionary basis or a nondiscretionary basis. Clients are permitted to impose restrictions on investing in certain securities or types of securities, which are listed in our ADV Part 2A, Item 7. All accounts are reviewed with you by your assigned advisory representative, initially and at least annually or as agreed upon with you. The reviews focus on consistency of portfolio investments with investment objectives and risk tolerances. In addition, investment constraints are considered and tested against portfolio holdings.

Our investment adviser representatives are licensed advisers with the state(s) in which they conduct business. Please refer to the SIM’ Brochure Supplement-Part 2B of Form ADV for specific education, experience, and qualifications of each of our professionals.

How will we choose investments to recommend for your account?

After we jointly review your financial situation, SIM’s investment adviser representatives (“IARs”) primarily will recommend that clients authorize the active discretionary management of their assets. Account supervision is guided by the client’s stated objectives, risk profile, management style, as well as tax considerations. Based on these considerations, SIM will select specific investments for your portfolios through the use of fundamental and technical analysis. If agreed upon by you, SIM will exercise discretionary authority over your account, which means we will select the amount of securities bought and sold for your account with or without your prior approval.

Conversation starters: We encourage you to ask your financial advisor these key questions:

- 1) Given my financial situation, should I choose an investment advisory service? Why or why not?
- 2) How will you select investments under your discretionary authority?
- 3) What is your relevant experience and educational background in the financial services business? What do your qualifications mean?

Item 3: Fees, Costs, Conflicts and Standard of Conduct

What fees will you pay?

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. Our fee is based on the total market value of your account on the last day of the quarter following your account’s effective date. Fees for individually managed accounts are priced within a range of .75% to 1.0% for each individual client. This fee is negotiable and is based on client demands, account size, account stipulations, and trading frequency. SIM bases this fee on the net asset value that is reported on the client’s Brokerage Account Quarterly Statement provided by Charles Schwab.

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For example, our fee on a \$500,000 account at 1.0% would be \$5,000 per year, deducted quarterly at \$1,250 per quarter. Unless paid outside of the assets in the account we manage, the asset-based fee reduces the value of your account and will be deducted from your account. As your investment adviser, we have to act in your best interest and not put our interest ahead of yours.

Please note, you will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you will be paying.

Mutual funds and ETFs recommended by SIM have underlying fees that are disclosed in their prospectuses. Other costs incurred in your account may include prime broker charges, wire transfer and electronic fund transfer fees, fees and taxes on brokerage accounts and securities transactions. We do not collect any fees or revenue from these products.

What are our legal obligations to you as an investment adviser?

When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice, we provide you. Here are some examples to help you understand what this means.

Example 1: SIM and/or its investment advisory representatives may from time-to-time purchase or sell products or investments that they may recommend to clients. In such circumstances, SIM or its investment adviser representatives may have a financial interest in recommending investments that SIM or its representatives also own.

Example 2: SIM and its investment adviser representatives receive compensation based on a percentage of your assets under management. As the value of your assets under management increase, total compensation you pay to SIM and its representatives also increases. However, if your account value decreases, you still pay a fee to SIM and its representatives.

How might our conflicts of interest affect you, and how will we address them?

Because SIM charges clients a fee based on the value of the client's assets under management, we benefit from the advisory services we provide to you. Since our income comes from the fee we charge, we may take risks to increase your assets so we can earn additional income. We also have an incentive to encourage clients to allocate greater assets to our management services. However, our portfolio management standards and compliance procedures provide guidance to manage your account in accordance with your best interest regardless of this conflict.

Conversation starter: If you have any questions concerning our fees or conflicts of interest, please feel free to ask us questions, such as: "How may your conflicts of interests or fee structure affect me, and how will they be addressed?"

Item 4: Disciplinary History

Do we or our financial professionals have legal or disciplinary history?

Yes. We encourage you to visit investor.gov/CRS for a free and simple search tool to research any of our financial professionals.

Conversation starter: Feel free to ask: "As a financial professional, do you have any disciplinary history? For what type of conduct?"

Item 5: Additional Information

Where is additional information available?

You should independently consult SIM all of the information stated here with our other regulatory filings. For additional information on our investment advisory services, see our Form ADV, along with the brochure supplement on each of our financial professionals, on IAPD on Investor.gov. Information regarding our SIM can be found at adviserinfo.sec.gov or by calling our firm at the telephone number listed below for up-to-date information. If you have a problem with your investments, investment account or a financial professional, contact us in writing at the address listed above. If you fail to gain timely satisfaction through this course of action, you may wish to report the problem to the SEC at Investor.gov or call the toll-free investor assistance line at 800-7320330.

Conversation starter: we welcome you to ask "Who is my primary contact? Is he or she a representative of an investment adviser representative? With whom may I speak if I have concerns about my primary contact?"

Your adviser serves as your primary contact with our firm. If you have concerns about how this person is treating you, you should contact the firm at (513)-278-7467.