

Zuma Wealth LLC
Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of Zuma Wealth LLC . If a Client has any questions about the contents of this brochure, please contact the Firm at (310) 456-1302 or by email at: Compliance@ZumaWealth.com. 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.

Additional information about Zuma Wealth LLC is also available on the SEC's website at www.adviserinfo.sec.gov. Zuma Wealth LLC's CRD number is: 311488.



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Registration as an investment adviser does not imply a certain level of skill or training.

Version Date: 02/28/2026

Item 2: Material Changes

The last annual update of this Brochure was filed on 03/28/2025. Since then, the following changes (deemed Material Changes) have been made:

In Item 5, the fee for a stand-alone financial planning project is increased from \$2500 to \$3000. Also in Item 5, language referencing a minimum fee of \$500/month is removed. Also, in Item 5, language is added to clarify management fee calculations when assets under management (AUM) pass certain breakpoints.

In Item 8, the risks involved with investing in private investments is added.

In Item 15, language is added to state that Zuma Wealth LLC can establish standing letter of instructions or other similar asset transfer authorization arrangements ("SLOA") with qualified custodians in order for us to disburse funds to accounts as specifically designated by the client.

From time to time, Zuma Wealth LLC may amend this Brochure to reflect changes in its business practices, changes in regulations, and routine annual updates as required by securities regulators. Either this complete 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 Zuma Wealth LLC.

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Item 4: Advisory Business

A. Description of the Advisory Firm

Zuma Wealth LLC (hereinafter “Zuma Wealth LLC” or “the Firm”) is a Limited Liability Company organized in the State of California. The firm was formed in October 2020, and the principal owner is Theresa Frances Spath.

B. Types of Advisory Services

Zuma Wealth LLC primarily provides two types of advisory services: Investment Management Services and Financial Planning Services. The combination of these services is called Wealth Management Services. Each of these services is described more fully below.

Wealth Management Services

Wealth Management encompasses investment management services and financial planning. The Firm provides continuous advice to a Client regarding the investment of Client funds based on the individual needs of the Client. Through personal discussions in which goals and objectives based on a Client's particular circumstances are established, the Firm develops a Client's personal investment policy or an investment plan with an asset allocation target with the goal of creating and managing a portfolio based on that policy and allocation targets. The Firm will also review and discuss a Client's prior investment history, as well as family composition and background. 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 risk tolerance and tax considerations.

The Firm primarily advises Clients regarding investments in stocks (public or private), bonds (public or private), mutual funds, ETFs, U.S. government, corporate and municipal securities, and cash and cash equivalents. The Firm may also provide advice regarding investments held in Client's portfolio at the inception of our advisory relationship and/or other investment types not listed above, at the Client's request.

When the Firm provides investment management services, Clients grant limited authority to buy and sell securities on a discretionary basis. More information on trading authority is explained in Item 16 of this Brochure. Clients may impose reasonable restrictions, in writing, on investing in certain securities, types of securities, or industry sectors.

At no additional fee and at Client's election, Zuma Wealth LLC also provides the Client with a financial plan. A Client will be taken through establishing their goals and values around money. The Client will be required to provide pertinent information to help complete the following areas of analysis: net worth, cash flow, credit scores/reports, employee benefits, Social Security statements, retirement planning, insurance, investments, college planning, and estate planning. Once the Client's information is reviewed, a personalized financial plan is built and analyzed, and then the findings, analysis and potential changes to their current situation are reviewed with the Client. The plan and the Client's financial situation and goals will be monitored throughout the year.

Financial Planning Services

Financial Planning Services (as a stand-alone project) include the initial writing and formulation of a personal financial plan, with recommendations and supporting written work as necessary, and may include the ongoing tracking of the Client's progress in achieving the personal financial goals targeted in the plan. The Financial Planning Services process typically begins with the collection, organization, and assessment of relevant client data, including information concerning the Client's lifestyle, risk tolerance, assets, and cash flow, as well as identification of the Client's financial concerns, goals, and objectives. The primary objective of this process is to allow Zuma Wealth LLC to assist the Client in developing a strategy for the successful management of income, assets, and liabilities to help meet the Client's individual financial objectives.

Educational Seminars

From time to time, Zuma Wealth LLC offers educational workshops to Clients, prospective Clients and guests. We do not charge a fee for this service.

C. Client Tailored Services and Client Imposed Restrictions

Wealth management is tailored to individual needs using the full breadth of expertise that Zuma Wealth LLC holds including fundamental analysis, economic analysis, technical analysis, asset allocation modeling, portfolio management, stress testing, behavioral psychology, study of academic research, and modern portfolio theory understanding, as examples. The CIO holds far-reaching academic credentials and real-world investment experience spanning more than 25 years and brings that perspective to the Client service experience.

D. Wrap Fee Program

Zuma Wealth LLC does not participate in any wrap fee programs.

E. Assets Under Management

Zuma Wealth LLC has the following assets under management as of December 31, 2025:

Discretionary Amounts: \$56,815,316

Non-discretionary amounts: \$0

Item 5: Fees and Compensation

A. Fee Schedule

Wealth Management

The advisory fee is calculated monthly in arrears. It is based on the annual rate shown in the fee schedule, applied to the account value as of the last business day of the prior billing period (as reported by the custodian), divided by 12, and charged monthly. Fees may be prorated for cash inflows or outflows during the month based on the number of days the assets were in the account.

The fee schedule is tiered. As assets under management increase and exceed certain breakpoints, lower rates apply to the assets above each threshold.

Fees are generally negotiable and will be detailed in the client’s advisory agreement. An initial investment plan or financial planning consultation generally does not incur an additional fee. However, more complex planning services may involve a separate fee, which will be agreed upon in advance.

A Client may terminate the agreement without penalty for a full refund of Zuma Wealth LLC's fees within five business days of signing the Investment Advisory Contract. Thereafter, a Client may terminate the Investment Advisory Contract generally with 30 days written notice.

Assets Under Management	Advisory Fee (% of AUM)
under \$1,000,000	1.25%
\$1,000,001 to \$5,000,000	1.00%
\$5,000,001 to \$7,000,000	0.90%
over \$7,000,001	0.85%

Financial Planning

Zuma Wealth LLC charges a fixed fee of \$3,000 for Project-Based Financial Planning and allows for up to 10 hours of planning services, typically over 1-3 months. Fees are negotiable and the final agreed upon fee will be outlined in an Advisory Contract.

B. Payment of Fees

Payment of Portfolio Management Fees

Asset-based portfolio management fees are withdrawn directly from the Client's accounts with Client's written authorization on a monthly basis. Fees are prorated and paid in arrears.

Payment of Financial Planning Fees – Fees are paid in 3 installments, with the final installment due by delivery of the final plan. Fees are paid by electronic funds transfer (EFT) or check. Zuma Wealth LLC will not bill an amount above \$500 more than 6 months or more in advance of rendering the services.

C. Client Responsibility for Third-Party Fees

The Client is responsible for the payment of all third-party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by Zuma Wealth LLC. Please see Item 12 of this brochure regarding broker-dealer/custodian.

D. Termination of Services

Zuma Wealth LLC collects fees in arrears. Wealth management fees accrued but not yet paid will be charged on a prorated basis. The fee will be equal to the daily rate times the number of days elapsed in the billing period up to and including the day of termination, plus 30 days. (The daily rate is calculated by dividing the monthly asset-based fee by 30).

E. Outside Compensation for the Sale of Securities to Clients

Neither Zuma Wealth LLC nor its supervised persons accept any compensation for the sale of investment products, including asset-based sales charges or service fees from the sale of mutual funds.

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

Zuma Wealth LLC does not accept performance-based fees or other fees based on a share of capital gains on, or capital appreciation of the assets of a client.

Item 7: Types of Clients

Zuma Wealth LLC generally provides advisory services to the following types of clients:

- ❖ Individuals
- ❖ High-net-worth individuals
- ❖ Nonprofit institutions

Item 8: Methods of Analysis, Investment Strategies & Risk of Loss

A. Methods of Analysis, Investment Strategies

Methods of Analysis

Zuma Wealth LLC's methods of analysis include Fundamental Analysis, Economic Analysis, Behavioral Psychology, Technical Analysis, and Modern Portfolio Theory application.

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.

Economic analysis uses academically tested theories to study relationships between different variables. It applies these frameworks to real-world data to understand how changes in one factor—such as interest rates, wages, or policy—affect economic behavior and outcomes. By identifying patterns, incentives, and trade-offs, economic analysis helps explain past trends and inform forecasts, business decisions, and public policy.

Behavioral psychology is the study of repetitive and predictable human decision biases. It examines how cognitive shortcuts, emotions, and social influences lead people to make choices that deviate from purely rational models. By understanding these patterns, behavioral psychology helps explain financial decisions, consumer behavior, and other real-world actions, and can inform strategies to improve decision-making and outcomes.

Technical analysis involves using chart patterns, momentum, volume, and relative strength to pick sectors that may outperform market indices.

Modern portfolio theory (MPT):

The underlying principles of MPT are:

- Investors are risk averse.
- Markets are efficient.
- The design of the portfolio as a whole is more important than the selection of any particular security. The appropriate allocation of capital among asset classes will have far more influence on long-term portfolio performance than the selection of individual securities.
- Investing for the long-term (preferably longer than ten years) becomes critical to investment success because it allows the long-term characteristics of the asset classes to surface.
- Increasing diversification of the portfolio with lower correlated asset class positions can decrease portfolio risk. Correlation is the statistical term for the extent to which two asset classes move in tandem or opposition to one another.

Investment Strategies

Zuma Wealth LLC uses long term trading, short term trading and options trading (including covered options, uncovered options, or spreading strategies).

B. Material Risks Involved

Methods of Analysis

Fundamental Analysis: The risk is that the 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.

Economic analysis. The risk involved in using this method is that there are many relationships and variables that cannot be isolated or controlled and probability of conclusion can change.

Behavioral psychology: Just because certain biases (like herd behavior or loss aversion) are common doesn't mean they will always occur in a predictable way.

Technical analysis: There is no assurance that trends will develop in the markets we follow. Even where major trends develop, outside factors could potentially shorten them.

Modern Portfolio Theory: Market risk is that part of a security's risk that is common to all securities of the same general class (stocks and bonds) and thus cannot always be eliminated by diversification.

Investment Strategies

Long term trading is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

Short term trading risks include liquidity, economic stability, and inflation, in addition to the trading risks listed above. Frequent trading can affect investment performance, particularly through increased transaction costs and taxes.

Options transactions involve a contract to purchase a security at a given price, not necessarily at market value, depending on the market. This strategy includes the risk that an option may expire out of the money resulting in minimal or no value, as well as the possibility of leveraged loss of trading capital due to the leveraged nature of stock options.

Investing in securities involves a risk of loss that a Client should be prepared to bear.

C. Risks of Specific Securities Utilized

The investment types listed below (leaving aside Treasury Inflation Protected/Inflation Linked Bonds) are not guaranteed or insured by the FDIC or any other government agency.

Mutual Funds: Investing in mutual funds carries the risk of capital loss and thus may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond, stock, real estate, commodities, currencies or any other nature of asset class.

Equity investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

Fixed income investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best-known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a

potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

Exchange Traded Funds (ETFs): An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital. **Precious Metal ETFs** (e.g., Gold, Silver, or Palladium Bullion backed “electronic shares” not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors. The return of an **Index ETF** is usually different from that of the index it tracks because of fees, expenses, and tracking error. An ETF may trade at a premium or discount to its net asset value (NAV) (or indicative value in the case of exchange-traded notes). The degree of liquidity can vary significantly from one ETF to another and losses may be magnified if no liquid market exists for the ETF’s shares when attempting to sell them. Each ETF has a unique risk profile, detailed in its prospectus, offering circular, or similar material, which should be considered carefully when making investment decisions.

Real estate funds (including REITs) face several kinds of risk that are inherent in the real estate sector, which historically has experienced significant fluctuations and cycles in performance. Revenues and cash flows may be adversely affected by: changes in local real estate market conditions due to changes in national or local economic conditions or changes in local property market characteristics; competition from other properties offering the same or similar services; changes in interest rates and in the state of the debt and equity credit markets; the ongoing need for capital improvements; changes in real estate tax rates and other operating expenses; adverse changes in governmental rules and fiscal policies; adverse changes in zoning laws; the impact of present or future environmental legislation and compliance with environmental laws.

Commodities are tangible assets used to manufacture and produce goods or services.

Commodity prices are affected by different risk factors, such as disease, storage capacity, supply, demand, delivery constraints and weather. Because of those risk factors, even a well-diversified investment in commodities can be uncertain.

Options are contracts to purchase a security at a given price, risking that an option may expire out of the money resulting in minimal or no value. An uncovered option is a type of options contract that is not backed by an offsetting position that would help mitigate risk. The risk for a “naked” or uncovered put is not unlimited, whereas the potential loss for an uncovered call option is limitless. Spread option positions entail buying and selling multiple options on the same underlying security, but with different strike prices or expiration dates, which helps limit the risk of other option trading strategies. Option transactions also involve risks including but not limited to economic risk, market risk, sector risk, idiosyncratic risk, political/regulatory risk, inflation (purchasing power) risk and interest rate risk.

Private investments funds: Illiquidity is a primary concern, as these funds often require capital to be locked up for years, limiting access to your money. Limited transparency is another risk, since private funds are not subject to the same reporting requirements as public investments,

making it harder to evaluate performance, holdings, or fees. High fees—including management and performance-based fees—can reduce returns. Private funds may involve concentrated investments or complex strategies, increasing the potential for losses. Regulatory and operational risks exist, as these funds are often lightly regulated, and the fund’s management decisions can have a large impact on outcomes.

Past performance is not indicative of future results. Investing in securities involves a risk of loss that a Client, should be prepared to bear.

Item 9: Disciplinary Information

A. Criminal or Civil Actions

There are no criminal or civil actions to report.

B. Administrative Proceedings

There are no administrative proceedings to report.

C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

A. Registration as a broker/dealer or broker/dealer representative.

Neither Zuma Wealth LLC nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither Zuma Wealth LLC nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interest

Neither Zuma Wealth LLC, nor its representatives, are investment advisors or applying to be investment advisors with any other investment advisory firm. Zuma Wealth LLC and its representatives always act in the best interest of its clients.

D. Selection of Other Advisors or Managers and How This Manager is Compensated

Zuma Wealth LLC does not utilize nor select third-party investment advisers

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

A. Code of Ethics

Zuma Wealth LLC has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. Zuma Wealth LLC's Code of Ethics is available free upon request to any Client or prospective client.

B. Recommendations Involving Material Financial Interests

Zuma Wealth LLC does not recommend that Clients buy or sell any security in which a related person to Zuma Wealth LLC or Zuma Wealth LLC has a material financial interest.

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of Zuma Wealth LLC may buy or sell securities for themselves that they also recommend to its Clients. This may provide an opportunity for representatives of Zuma Wealth LLC to buy or sell the same securities before or after recommending the same securities to a Client resulting in representatives profiting off the recommendations they provide to a Clients. Zuma Wealth LLC will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to a Client's disadvantage when similar securities are being bought or sold.

D. Trading Securities at or Around the Same Time as Clients' Securities

From time to time, representatives of Zuma Wealth LLC may buy or sell securities for themselves at or around the same time as a Client. This may provide an opportunity for representatives of Zuma Wealth LLC to buy or sell securities before or after recommending securities to a Client resulting in representatives profiting off the recommendations they provide to clients. Zuma Wealth LLC will never engage in trading that operates to a Client's disadvantage if representatives of Zuma Wealth LLC buy or sell securities at or around the same time as clients.

Item 12: Brokerage Practices

A. Factors Used to Select Custodians and/or Broker/Dealers

Custodians/broker-dealers will be recommended based on Zuma Wealth LLC's duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. A Client will not necessarily pay the lowest commission or commission equivalent, and Zuma Wealth LLC may also consider the market expertise and research access provided by the broker-dealer/custodian, including but not

limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers that may aid in Zuma Wealth LLC's research efforts. Zuma Wealth LLC will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian.

Zuma Wealth LLC will require its clients to use Schwab Institutional in most situations

Research and Other Soft Dollar Benefits: Zuma Wealth LLC has no formal soft dollars program in which soft dollars are used to pay for third party services. **Brokerage for Client Referrals:** Zuma Wealth LLC receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party. **Clients Directing Which Broker/Dealer/Custodian to Use:** Zuma Wealth LLC will require clients to use a specific broker-dealer to execute transactions. Not all advisers require clients to use a particular broker-dealer.

B. Aggregating (Block) Trading for Multiple Client Accounts

If Zuma Wealth LLC buys or sells the same securities on behalf of more than one Client, then it may (but would be under no obligation to) aggregate or bunch such securities in a single transaction for multiple clients in order to seek more favorable prices, lower brokerage commissions, or more efficient execution. In such case, Zuma Wealth LLC would place an aggregate order with the broker on behalf of all such Clients in order to ensure fairness for all Clients; provided, however, that trades would be reviewed periodically to ensure that accounts are not systematically disadvantaged by this policy. Zuma Wealth LLC would determine the appropriate number of shares and select the appropriate brokers consistent with its duty to seek best execution, except for those accounts with specific brokerage direction (if any).

Item 13: Review of Accounts

A. Frequency and Nature of Investment Reviews and Who Makes Those Reviews

All client investment accounts for Zuma Wealth LLC's Investment Management Services are reviewed on an ongoing basis by Theresa F. Spath, Chief Investment Officer regarding clients' respective investment policies and risk tolerance levels. All accounts at Zuma Wealth LLC are assigned to this reviewer.

B. Factors That Will Trigger Additional Client Meetings

Client meetings and reviews may be triggered by material market, economic or political events, or by changes in a Client's financial situation (such as retirement, termination of employment, physical move, or inheritance) and are available on an ongoing basis.

C. Content and Frequency of Regular Reports Provided to Clients

Each Client of Zuma Wealth LLC's advisory services will receive a monthly report detailing the Client's account, including assets held, asset value, and calculation of fees. This written report will come from the custodian. In addition, Zuma Wealth LLC will also provide a separate written statement to the Client on a monthly basis with qualitative commentary on the Client's portfolio,

may include quantitative insight on allocation, holdings and/or performance and also will include calculation of the management fee.

Item 14: Client Referrals and Other Compensation

A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

Zuma Wealth LLC does not receive any economic benefit, directly or indirectly from any third party for advice rendered to Zuma Wealth LLC's clients.

With respect to Schwab, Zuma Wealth LLC receives access to Schwab's institutional trading and custody services, which are typically not available to Schwab retail investors. These services generally are available to independent investment advisers on an unsolicited basis, at no charge to them so long as a total of at least \$10 million of the adviser's clients' assets are maintained in accounts at Schwab Advisor Services. Schwab's services include brokerage services that are related to the execution of securities transactions, custody, research, including that in the form of advice, analyses and reports, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment. For Zuma Wealth LLC client accounts maintained in its custody, Schwab generally does not charge separately for custody services but is compensated by account holders through commissions or other transaction-related or asset-based fees for securities trades that are executed through Schwab or that settle into Schwab accounts.

Schwab also makes available to Zuma Wealth LLC other products and services that benefit Zuma Wealth LLC but may not benefit its clients' accounts. These benefits may include national, regional or Zuma Wealth LLC specific educational events organized and/or sponsored by Schwab Advisor Services. Other potential benefits may include occasional business entertainment of personnel of Zuma Wealth LLC by Schwab Advisor Services personnel, including meals, invitations to sporting events, including golf tournaments, and other forms of entertainment, some of which may accompany educational opportunities. Other of these products and services assist Zuma Wealth LLC in managing and administering clients' accounts. These include software and other technology (and related technological training) that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts, if applicable), provide research, pricing information and other market data, facilitate payment of Zuma Wealth LLC's fees from its clients' accounts (if applicable), and assist with back-office training and support functions, recordkeeping and client reporting. Many of these services generally may be used to service all or some substantial number of Zuma Wealth LLC's accounts. Schwab Advisor Services also makes available to Zuma Wealth LLC other services intended to help Zuma Wealth LLC manage and further develop its business enterprise. These services may include professional compliance, legal and business consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, employee

benefits providers, human capital consultants, insurance and marketing. In addition, Schwab may make available, arrange and/or pay vendors for these types of services rendered to Zuma Wealth LLC by independent third parties. Schwab Advisor Services may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to Zuma Wealth LLC. Zuma Wealth LLC is independently owned and operated and not affiliated with Schwab.

B. Compensation to Non-Advisory Personnel for Client Referrals

Zuma Wealth LLC does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

Item 15: Custody

When advisory fees are deducted directly from client accounts at client's custodian, Zuma Wealth LLC will be deemed to have limited custody of client's assets. Because client fees will be withdrawn directly from client accounts, in states that require it, Zuma Wealth LLC will:

- A. Possess written authorization from the client to deduct advisory fees from an account held by a qualified custodian.
- B. Send the qualified custodian written notice of the amount of the fee to be deducted from the client's account and verify that the qualified custodian sends invoices to the client.
- C. Send the client a written invoice itemizing the fee upon or prior to fee deduction, including the formula used to calculate the fee, the time period covered by the fee and the amount of assets under management on which the fee was based.

Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy. Clients are urged to compare the account statements they received from the custodian with those they received from Zuma Wealth LLC.

Zuma Wealth LLC can establish standing letter of instructions or other similar asset transfer authorization arrangements ("SLOA") with qualified custodians in order for us to disburse funds to accounts as specifically designated by the client. With a SLOA a client can typically authorize first-party and/or thirdparty transfers. If transfers are third-party, Zuma Wealth LLC complies with each of the requirements and conditions enumerated below:

1. The client provides an instruction to the qualified custodian, in writing, that includes the client's signature, the third party's name, and either the third party's address or the third party's account number at a custodian to which the transfer should be directed.
2. The client authorizes Zuma Wealth LLC, in writing, either on the qualified custodian's form or separately, to direct transfers to the third party either on a specified schedule or from time to time.
3. The client's qualified custodian performs appropriate verification of the instruction, such as a signature review or other method to verify the client's authorization, and provides a transfer of funds notice to the client promptly after each transfer.

4. The client has the ability to terminate or change the instruction to the client's qualified custodian.
5. Zuma Wealth LLC has no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party contained in the client's instruction.
6. Zuma Wealth LLC maintains records showing that the third party is not a related party of Zuma Wealth LLC or located at the same address as Zuma Wealth LLC.
7. The client's qualified custodian sends the client, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

Item 16: Investment Discretion

Zuma Wealth LLC provides discretionary and non-discretionary investment advisory services to clients. The advisory contract established with each Client sets forth the discretionary authority for trading. Where investment discretion has been granted, Zuma Wealth LLC generally manages a Client's account and makes investment decisions without consultation with the Client as to when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, what securities to buy or sell, or the price per share. In some instances, Zuma Wealth LLC's discretionary authority in making these determinations may be limited by conditions imposed by a Client (in investment guidelines or objectives, or Client instructions otherwise provided to Zuma Wealth LLC).

Item 17: Voting Client Securities (Proxy Voting)

Zuma Wealth LLC generally 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 has any questions on a particular proxy vote, they may contact us at the number listed on the cover of this brochure.

In most cases, the Client will receive proxy materials directly from the account custodian. However, in the event Zuma Wealth LLC receives any written or electronic proxy materials, the Firm will forward them directly to the Client by mail, unless the Client has authorized the Firm to contact the Client by electronic mail, in which case, those are forwarded to the Client.

Item 18: Financial Information

We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to our Clients, nor have we been the subject of any bankruptcy proceeding. We do not have custody of Client funds or securities, except as disclosed in Item 15 above, or require or solicit prepayment of more than \$500/\$1,200 in fees six months or more in advance.

Item 19: Requirements for State Registered Advisors

A. Principal Executive Officers and Management Persons; Their Formal Education and Business Background

Zuma Wealth LLC currently has only one management person: Theresa Frances Spath. Education and business background can be found on the individual's Form ADV Part 2B brochure supplement.

B. Other Business in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (if any)

Other business activities for each relevant individual can be found on the Form ADV Part 2B brochure supplement for each such individual.

C. Calculation of Performance-Based Fees and Degree of Risk to Clients

Zuma Wealth LLC does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a Client.

D. Material Disciplinary Disclosures for Management Persons of this Firm

There are no civil, self-regulatory organizations, or arbitration proceedings to report under this section.

E. Material Relationships That Management Persons Have with Issuers of Securities (if any)

Neither Zuma Wealth LLC, nor its management persons, has any relationship or arrangement with issuers of securities. See Item 10.C and 11.B. Any material conflicts of interest have been disclosed.