Item 1 Cover Page

Simeon Capital LLC
11710 Shadystone Terrace
Mitchellville, MD 20721

March 24, 2023

This brochure provides information about the qualifications and business practices of Simeon Capital LLC, CRD# 322389. If you have any questions about the contents of this brochure, please contact us at 646-288-3620. 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. Registration as a registered investment advisor does not imply a certain level of skill or training.

Additional information about Simeon Capital LLC also is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Material Changes

There have been no material changes to this Brochure since the initial Brochure approved on September 19, 2022.

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Item 4 Advisory Business

Simeon Capital LLC is a firm that was formed in 2020 and has been registered with the Maryland securities regulators as an investment advisor since September 2022.

The principal owner of Simeon Capital LLC is Roger Rigby, Founder and Chief Compliance Officer.

Investment Advisory Services

Simeon Capital LLC's ("Simeon Capital" or "Advisor") principal service is providing general financial consulting services for clients depending on client needs. Simeon Capital will meet with the client and develop an asset allocation or investment policy statement based on the clients' individual financial objectives, needs, and circumstances. Simeon Capital may also review, analyze, and make recommendations on existing portfolios of prospective clients.

If the client decides to engage Simeon Capital for portfolio management, we offer customized portfolio construction and ongoing recommendations in which Simeon Capital provides individual investment instructions in accordance with the client's tailored investment objectives. Investment products can include individual listed exchange traded securities, securities traded over the counter (OTC), foreign securities, U.S. Government securities, ETFs, mutual funds, and options contracts on securities (e.g., covered call writing). The client decides whether to make the trades and trades their own account. Simeon Capital does not have access to, or trade client accounts.

The Advisor measures and selects mutual funds by using various criteria, such as the fund manager's tenure, and/or overall career performance. The Advisor may recommend, on occasion, redistributing investment allocations to diversify the portfolio in an effort to reduce risk and increase performance. The Advisor may recommend specific stocks to increase sector weighting and/or dividend potential. The Advisor may recommend employing cash positions as a possible hedge against market movement which may adversely affect the portfolio. The Advisor may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position(s) in the portfolio, change in risk tolerance of client, or any risk deemed unacceptable for the client's risk tolerance.

Weekly Market Update and Quarterly Newsletter

Simeon Capital provides a weekly market update service and quarterly investment newsletters, both of which are provided on a single subscription basis. The weekly market update covers current market conditions and commentary. The quarterly newsletter provides more in-depth, wholistic analyses of markets, including fixed income, equities, options, and currency markets, and the impacts that global and domestic events and economic conditions are having or may have on them.

Seminars

Simeon Capital will conduct investment educational seminars on various investing topics to groups. Simeon Capital will work with the group representative to determine the relevant topics to be presented, and the sophistication of the intended audience for the seminar, from which the agenda for the seminar will be developed. The educational seminars may range from an hour to a half-day depending on the needs and objectives of the group.

Simeon Capital will tailor its advisory services to its client's individual needs based on meetings and conversations with the client. If clients wish to impose certain restrictions on investing in certain securities or types of securities, the Advisor will incorporate those restrictions in making investment recommendations to the client.

Simeon Capital does not provide portfolio management services to wrap fee programs.

As of December 31, 2022, Simeon Capital had no clients for which it provided continuous and regular advisory services, and therefore no client assets under management to report.

Item 5 Fees and Compensation

Investment Advisory Fees
Simeon Capital offers its investment advisory services to clients with two fee options, either hourly or an annual fee based on a percentage of assets under management pursuant to an investment advisory agreement signed by each client.

Hourly Fee
The hourly fee for investment advisory services is $275 per hour. The hourly rate is negotiable at the discretion of Simeon Capital. Hourly fees are invoiced monthly in arrears after the end of the month and is based on the number of hours expended. The invoice is payable within 10 days of receipt by the client and may be paid by check or ACH.

Percentage of Assets Under Management Fee
For those clients who choose the percentage of assets under management fee, client will pay the annual fee shown in the table below. The fee is payable quarterly in advance, based on the value of portfolio assets of the account managed by the Advisor as of the opening of business on the first business day of each quarter. New account fees will be prorated from the inception of the account to the end of the first quarter.

Assets Under Management	**Annual Fee**
Up to $100,000	1.50%
$100,001 to $500,000	1.25%
$500,001 to $1,000,000	1.00%
$1,000,001 to $3,000,000	0.75%
Over $3,000,000	0.50%

These fees may be negotiated at the sole discretion of the Advisor. Asset management fees will be invoiced to the client at the beginning of the relationship and then at the beginning of each quarter. The fee is payable within 10 days of receipt of the invoice. The invoice is payable by check or ACH.

Subscription Fees
Clients that subscribe to the weekly market update and quarterly newsletter have the option to pay for the service with a monthly fee of $10 or an annual fee of $100. Both the monthly fee and annual fee is payable in advance at the beginning of each month or when first subscribing, and then on each anniversary, as applicable. The subscription fees are not negotiable. However, this service will be provided at no additional cost for portfolio management clients who pay based on the assets under management fee structure. The Advisor will provide invoices at the beginning of each period, and the invoices are payable within 10 days of receipt. The invoice is payable by check or ACH.

Seminar Fees
Seminars will be charged on a fixed fee basis. The seminar fee will range from $250 to $2,500 depending on the scope and length of the seminar as defined and negotiated and contracted with each group engaging Simeon Capital. The seminar fee is payable upon delivery of the seminar.

For each of the Advisor's services described above, the Client may terminate these services within five business days of the effective date of an Agreement signed with the Advisor without penalty.

All fees paid to Simeon Capital for investment advisory services are separate and distinct from the expenses charged by mutual funds to their shareholders. These fees and expenses are described in each fund’s prospectus. These fees will generally include a management fee and other fund expenses. Client is responsible for all custodial and securities execution fees charged by the custodian and executing broker-dealer. The Advisor’s fee is separate and distinct from the custodian and execution fees.

At no time will Simeon Capital accept or maintain custody of a client’s funds or securities. Simeon Capital will not have access to clients’ brokerage accounts. Client will provide Simeon Capital with copies of trade confirmations and brokerage statements in order to provide the oversight of the account.

Simeon Capital’s percentage-based investment advisory fee and the annual weekly market update and quarterly newsletter fees are payable in advance. Upon termination, any fees paid in advance will be prorated to the date of termination and any unearned fees will be refunded to client.

Neither Simeon Capital nor its supervised persons 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.

Neither Simeon Capital nor its supervised persons accept compensation for the sale of securities or other investments, including asset-based sales charges or service fees from the sale of mutual funds.

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

Simeon Capital does not charge performance-based fees.

Item 7 Types of Clients

The Advisor will offer its services to individuals and high net worth individuals.

The Advisor does not have any minimum requirements for providing investment advisory services.

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

The Advisor may utilize fundamental, technical and cyclical analysis techniques in formulating investment advice and recommendation for clients.

Fundamental analysis of businesses involves analyzing its financial statements and health, its management and competitive advantages and its competitors and markets. Fundamental analysis is performed on historical and present data but with the goal of making financial forecasts. There are several possible objectives; to conduct a company stock valuation and predict its probable price evolution; to make a projection on its business performance; to evaluate its management and make internal business decisions and to calculate its credit risk.

Technical analysis is a method of evaluating securities by relying on the assumption that market data, such as charts of price, volume and open interest can help predict future (usually short-term) market trends. Technical analysis assumes that market psychology influences trading in a way that enables predicting when a stock will rise or fall.

Cyclical analysis of economic cycles is used to determine how these cycles affect the returns of an investment, an asset class or an individual company's profits. Cyclical risks exist because the broad economy has been shown to move in cycles, from periods of peak performance followed by a downturn, then a trough of low activity. Between the peak and trough of a business or other economic cycle, investments may fall in value to reflect the uncertainty surrounding future returns as compared with the recent past.

The purchase and sale recommendations to clients for implementing the investment strategies may include long-term purchases of securities held at least for one year, short-term purchases for securities sold within a year, trading of securities sold within 30 days, and option writing (covered options). Simeon Capital provides trade recommendations to its investment advisory clients but does not trade client accounts.

Clients need to be aware that investing in securities involves risk of loss that clients need to be prepared to bear.

The methods of analysis and investment strategies followed by the Advisor are utilized across all of the Advisors clients, as applicable. One method of analysis or investment strategy is not more significant than the other as the Advisor is considering the client's portfolio, risk tolerance, time horizon and individual goals. However, the client should be aware that with any trading that occurs in the client account, the client will incur transaction and administrative costs.

Investing includes the risk that the value of an investment can be negatively affected by factors specifically related to the investment (e.g., capability of management, competition, new inventions by other companies, lawsuits against the company, labor issues, patent expiration, etc.), or to factors related to investing and the markets in general (e.g., the economy, wars, civil unrest or terrorism around the world, concern about oil prices or unemployment, etc.).

Risks of fundamental analysis may include risks that market actions, natural disasters, government actions, world political events or other events not directly related to the price or valuation of a specific company's fundamental analysis can adversely impact the stock price of a company causing a portfolio containing that security to lose value. Risks may also include that the historical data and projections on which the fundamental analysis is performed may not continue to be relevant to the operations of a company going forward, or that management changes or the business direction of management of the company may not permit the company to continue to produce metrics that are consistent with the prior company data utilized in the fundamental analysis, which may negatively affect the Advisor's estimate of the valuation of the company.

In cyclical analysis, economic or business cycles may not be predictable and may have many fluctuations between long-term expansions and contractions. Also, the lengths of the economic cycles may be difficult to predict with accuracy. Therefore, the risk of cyclical analysis is the difficulty in predicting economic trends and consequently the changing value of securities that would be affected by these changing trends.

The primary risks in technical analysis are that the factors used to analyze the price, trends and volatility of a security may not be replicated, or the outcomes of such analysis will not be the same as in past periods where similar combinations existed. Because of the reliance on trends, technical analysis can signal buying at market peaks and selling at market troughs.

All investments involve some degree of risk. In finance, risk refers to the degree of uncertainty and/or potential financial loss inherent in an investment decision. In general, as investment risks rise, investors seek higher returns to compensate themselves for taking such risks.

Every saving and investment product have different risks and returns. Differences include how readily investors can get their money when they need it, how fast their money will grow, and how safe their money will be. The primary risks faced by investors include:

<u>Business Risk</u>
With a stock, you are purchasing a piece of ownership in a company. With a bond, you are loaning money to a company. Returns from both of these investments require that that the company stays in business. If a company goes bankrupt and its assets are liquidated, common stockholders are the last in line to share in the proceeds. If there are assets, the company's bondholders will be paid first, then holders of preferred stock. If you are a common stockholder, you get whatever is left, which may be nothing.

<u>Volatility Risk</u>
Even when companies aren't in danger of failing, their stock price may fluctuate up or down. Large company stocks as a group, for example, have lost money on average about one out

of every three years. A stock's price can be affected by factors inside the company, such as a faulty product, or by events the company has no control over, such as political or market events.

Inflation Risk
Inflation is a general upward movement of prices. Inflation reduces purchasing power, which is a risk for investors receiving a fixed rate of interest. The principal concern for individuals investing in cash equivalents is that inflation will erode returns.

Interest Rate Risk
Interest rate changes can affect a bond's value. If bonds are held to maturity the investor will receive the face value, plus interest. If sold before maturity, the bond may be worth more or less than the face value. Rising interest rates will make newly issued bonds more appealing to investors because the newer bonds will have a higher rate of interest than older ones. To sell an older bond with a lower interest rate, you might have to sell it at a discount.

Liquidity Risk
This refers to the risk that investors won't find a market for their securities, potentially preventing them from buying or selling when they want. This can be the case with the more complicated investment products. It may also be the case with products that charge a penalty for early withdrawal or liquidation such as a certificate of deposit (CD).

The Advisor primarily recommends that clients invest in U.S. and foreign equities (stocks), mutual funds, ETFs, U.S. Government securities.

Mutual Funds Risks:
Every type of investment, including mutual funds, involves risk. Risk refers to the possibility that you will lose money (both principal and any earnings) or fail to make money on an investment. A fund's investment objective and its holdings are influential factors in determining how risky a fund is. Reading the prospectus will help you to understand the risk associated with that particular fund.

Generally speaking, risk and potential return are related. This is the risk/return trade-off. Higher risks are usually taken with the expectation of higher returns at the cost of increased volatility. While a fund with higher risk has the potential for higher return, it also has the greater potential for losses or negative returns. The school of thought when investing in mutual funds suggests that the longer your investment time horizon is the less affected you should be by short-term volatility. Therefore, the shorter your investment time horizon, the more concerned you should be with short-term volatility and higher risk.

Below is a list of some of the risks to consider when investing in mutual funds.

- **Call Risk**. The possibility that falling interest rates will cause a bond issuer to redeem—or call—its high-yielding bond before the bond's maturity date.
- **Country Risk**. The possibility that political events (a war, national elections), financial problems (rising inflation, government default), or natural disasters (an earthquake, a poor harvest) will weaken a country's economy and cause investments in that country to decline.

- **Credit Risk**. The possibility that a bond issuer will fail to repay interest and principal in a timely manner. Also called default risk.
- **Currency Risk**. The possibility that returns could be reduced for Americans investing in foreign securities because of a rise in the value of the U.S. dollar against foreign currencies. Also called exchange-rate risk.
- **Income Risk**. The possibility that a fixed-income fund's dividends will decline as a result of falling overall interest rates.
- **Industry Risk**. The possibility that a group of stocks in a single industry will decline in price due to developments in that industry.
- **Inflation Risk**. The possibility that increases in the cost of living will reduce or eliminate a fund's real inflation-adjusted returns.
- **Interest Rate Risk**. The possibility that a bond fund will decline in value because of an increase in interest rates.
- **Manager Risk**. The possibility that an actively managed mutual fund's investment adviser will fail to execute the fund's investment strategy effectively resulting in the failure of stated objectives.
- **Market Risk**. The possibility that stock fund or bond fund prices overall will decline over short or even extended periods. Stock and bond markets tend to move in cycles, with periods when prices rise and other periods when prices fall.
- **Principal Risk**. The possibility that an investment will go down in value, or "lose money," from the original or invested amount.

Risks of Investing in Stocks:
All investments involve some degree of risk. In finance, risk refers to the degree of uncertainty and/or potential financial loss inherent in an investment decision. In general, as investment risks rise, investors seek higher returns to compensate themselves for taking such risks.

Every saving and investment product has different risks and returns. Differences include how readily investors can get their money when they need it, how fast their money will grow, and how safe their money will be.

<u>Business Risk</u>

With a stock, you are purchasing a piece of ownership in a company. With a bond, you are loaning money to a company. Returns from both of these investments require that that the company stays in business. If a company goes bankrupt and its assets are liquidated, common stockholders are the last in line to share in the proceeds. If there are assets, the company’s bondholders will be paid first, then holders of preferred stock. If you are a common stockholder, you get whatever is left, which may be nothing.

<u>Volatility Risk</u>

Even when companies aren’t in danger of failing, their stock price may fluctuate up or down. Large company stocks as a group, for example, have lost money on average about one out of every three years. Market fluctuations can be unnerving to some investors. A stock’s price can be affected by factors inside the company, such as a faulty product, or by events the company has no control over, such as political or market events.

Liquidity Risk
This refers to the risk that investors won't find a market for their securities, potentially preventing them from buying or selling when they want. This can be the case with the more complicated investment products.

Risks that apply to equity strategies, including ETFs, include but are not limited to, the following:

- Management Risk: Due to its passive and defensive management, a portfolio could underperform other portfolios with similar investment objectives and/or strategies.
- Allocation Risk: A portfolio may use an asset allocation strategy in pursuit of its investment objective. There is a risk that a portfolio's allocation among asset classes or investments will cause a portfolio to lose value or cause it to underperform other portfolios with a similar investment objective and/or strategy, or that the investments themselves will not produce the returns expected.
- Sector/Industry Risk: The risk that the strategy's concentration in equities in a specific sector or industry will cause the strategy to be more exposed to the price movements in and developments affecting that sector.
- Market and Timing Risk: Prices of securities may become more volatile due to general market conditions that are not specifically related to a particular company, such as adverse economic conditions or outlooks, adverse investor sentiment, changes in the outlook for corporate earnings, or changes in interest rates.
- Event Risk: The possibility that an unforeseen event will negatively affect a company or industry, and thus, increase the volatility of the security.
- Liquidity Risk: The risk that exists when a security's limited marketability prevents it from being bought or sold quickly enough to avoid or minimize a loss.

Risks of Investing in Foreign Securities:
Investing in emerging international markets may face increased volatility as a result of dramatic changes in market value and, in some cases, political risk can suddenly upend a nation's economy. Furthermore, international markets may be less regulated than those in the United States, increasing the risk of manipulation and fraud. Information may be inadequate, resulting in the investor's inability to interpret or understand events. Finally, currency risk stemming from changes in the exchange rate may affect the investor's home currency.

U.S. Government Securities Risks:
U.S. Government Securities are generally considered one of the safest investments in the global financial markets. Two types of risks exist, however: credit risk and interest rate risk. Credit risk is the risk that an issuer will default, while interest rate risk accounts for the impact of changes in prevailing rates. In general, it is widely accepted that U.S. Government Securities are among the world's safest in terms of the likelihood that their interest and principal will be paid on time. However, U.S. Government Securities are subject to interest rate risk, and longer-term securities (10 years and longer) can be quite volatile.

Risks of Investing in Options:
Options are financial contracts that have values derived from underlying assets. Like stocks, bonds, and ETFs, options carry no guarantees, and investors in options may lose the entire principal

invested or more. Using options on an underlying security creates risks that are different from investing in that security, and unique skills may be required to use options strategies effectively. Option prices tend to be much more volatile than their underlying securities due to leverage that is fundamental to their design which can magnify the price changes in the option relative to the underlying. Option sellers tend to bear significantly more risk than option buyers. While the maximum loss of a purchased option is generally limited to the option's price, a written (or sold) option can incur losses in excess of the value of the option or collateral required. For example, a short put option by itself can incur a loss equal to the strike price if the stock price goes to zero. A short call option by itself can theoretically have unlimited losses if the underlying stock price increases significantly past the strike price. The performance of an option strategy is influenced by the selection of underlying securities, expiration dates and strike prices. Similar option strategies using different underlying securities can have significantly different results. The success or failure of option strategies to accomplish their objectives can be significantly impacted by timing of market price movements relative to the expirations of long and short options held in the portfolio. Additionally, similar option strategies with different strike price selections can have significantly different results over time.

Item 9 Disciplinary Information

Neither Simeon Capital nor its management persons have had any legal or disciplinary events, currently or in the past.

Item 10 Other Financial Industry Activities and Affiliations

Neither Simeon Capital nor any of its management persons are registered, or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

Neither Simeon Capital nor any of its management persons are registered or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

Simeon Capital does not currently have any relationships or arrangements that are material to its advisory business or clients with either a broker-dealer, municipal securities dealer, or government securities dealer or broker, investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund" and offshore fund), other investment advisor or financial planner, futures commission merchant, commodity pool operator, or commodity trading advisor, banking or thrift institution, accountant or accounting firm, lawyer or law firm, insurance company or agency, pension consultant, real estate broker or dealer or sponsor of syndicator of limited partnerships.

Simeon Capital does not recommend or select other investment advisers for clients.

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

Simeon Capital is a state registered investment advisor and has adopted as an industry best practice a Code of Ethics that sets forth the basic policies of ethical conduct for all managers, officers, and employees of the adviser. In addition, the Code of Ethics governs personal trading by each employee of Simeon Capital deemed to be an Access Person and is intended to ensure that securities transactions effected by Access Persons of Simeon Capital are conducted in a manner that avoids any conflict of interest between such persons and clients of the adviser or its affiliates. Simeon Capital collects and maintains records of securities holdings and securities transactions effected by Access Persons. These records are reviewed to identify and resolve conflicts of interest. Simeon Capital will provide a copy of the Code of Ethics to any client or prospective client upon request.

Simeon Capital does not recommend to clients securities in which the firm or a related person has a material financial interest.

Simeon Capital and/or its investment advisor representatives may from time to time purchase or sell products that they may recommend to clients. This practice creates conflicts of interest in that personnel of Simeon Capital can take advantage of the advance knowledge of firm securities trading and trade their personal accounts ahead of the client trades or recommend trades in client accounts that may affect the price of the securities owned by the Investment Advisor Representatives. To mitigate these conflicts, Simeon Capital has adopted a Code of Ethics as noted above. Simeon Capital's Code of Ethics is available upon request. Finally, supervised persons of registered investment advisors are fiduciaries by law and are required to put the client's interest before those of the firm and themselves.

Simeon Capital requires that its investment advisor representatives follow its basic policies and ethical standards as set forth in its Code of Ethics.

Investment Advisor Representatives of Simeon Capital may trade for their own accounts securities that are being recommended that clients trade for their own accounts at or about the same time. To mitigate the conflict of interest in such circumstances, Simeon Capital's policy is to require the trading of all supervised persons accounts the day after the trade recommendations are made to clients. The Chief Compliance Officer examines personal trading activities of Simeon Capital's personnel to verify compliance with this policy.

Item 12 Brokerage Practices

Simeon Capital does not select or recommend broker-dealers for client transactions.

Simeon Capital does not receive research or other products or services from a broker-dealer or third party as a result of client securities transactions.

Simeon Capital does not receive client referrals from any broker-dealer or third party as a result of the firm selecting or recommending that broker-dealer to clients.

Simeon Capital does not recommend, request or require that a client direct it to execute transactions through a specified broker-dealer.

Simeon Capital does not trade accounts for clients and therefore is not involved in client directed brokerage. Clients choose their own broker-dealer and trades for themselves in those accounts that are recommended by Simeon Capital, if they choose to accept the trade recommendations.

Since Simeon Capital does not trade client accounts, and the clients choose their own brokers, there is no opportunity to aggregate client trades.

Item 13 Review of Accounts

Investment advisory client accounts are monitored on a quarterly basis or when conditions would warrant a review based on market conditions or changes in client circumstances. Triggering factors may include Simeon Capital becoming aware of a change in client's investment objective, a change in market conditions, change of employment, or a change in recommended asset allocation weightings in the account that exceed a predefined guideline. Client accounts are reviewed by Roger Rigby, Founder. The nature of the review is to determine if the client account is still in line with the client's stated objectives.

The client is encouraged to notify the Advisor and Investment Advisor Representative if changes occur in his/her personal financial situation that might materially affect his/her investment plan.

In addition to the periodic statements that clients from their broker-dealer, Simeon Capital will provide a quarterly report on the client's portfolio that documents changes during the quarter, the portfolio allocation percentages, comparison to benchmarks, and relevant information such as draw-downs, income earned and recommendations on allocation shifts, if appropriate.

Item 14 Client Referrals and Other Compensation

Simeon Capital is not compensated by anyone for providing investment advice or other advisory services except as previously disclosed in this Brochure.

Simeon Capital does not directly or indirectly compensate any person who is not a supervised person for client referrals.

Item 15 Custody

Simeon Capital does not have access to client accounts and therefore does not have custody of client funds or securities.

Item 16 Investment Discretion

Simeon Capital does not have investment discretion over client accounts.

Item 17 Voting Client Securities

Simeon Capital will not vote, nor advise clients how to vote, proxies for securities held in client accounts. The client clearly keeps the authority and responsibility for the voting of these proxies. The client and Simeon Capital agree to this by contract. Clients will receive proxy solicitations from their custodian and/or transfer agent.

Item 18 Financial Information

Simeon Capital does not require or solicit prepayment of more than $500 in fees per client, six months or more in advance, and is not required to file a balance sheet.

Simeon Capital does not have discretionary authority over client accounts but is not aware of any financial condition that will likely impair its ability to meet contractual commitments to clients. If Simeon Capital does become aware of any such financial condition, this brochure will be updated and clients will be notified.

Simeon Capital has never been subject to a bankruptcy petition.

Item 19 Requirements for State-Registered Advisers

Roger Rigby, Founder, was born in 1979.

Mr. Rigby earned a Bachelor of Science degree in Finance and Management Science & Statistics from the University of Maryland, and a Master's in Business Administration from Columbia Business School.

Prior to founding Simeon Capital LLC in 2020, Mr. Rigby was Senior Vice President, Investment Manager at Citigroup (August 2017 to February 2020), Senior Vice President, Lead Finance Officer at Citigroup (May 2015 to August 2017), Director, Private Markets for TRG Management LP (November 2013 to June 2014), Senior Vice President for Citigroup, Citi Venture Capital International (February 2011 to November 2013), Senior Vice President for Citigroup, Citi Venture Capital International (August 2009 to February 2011), Vice President for Citigroup, Corporate Strategy, EMEA (February 2009 to August 2009), and Financial Management Associate for Citigroup (July 2007 to February 2009).

Simeon Capital is not engaged in any other business other than giving investment advice.

Simeon Capital is not compensated for advisory services with performance-based fees.

Management of Simeon Capital have not been found liable in any arbitration, civil or disciplinary actions or administrative proceedings.

There are no material relationships maintained by Simeon Capital or its management persons with any issuers of securities.

Item 1 Cover Page for Brochure Supplement

Roger Rigby, CAIA, Founder

Simeon Capital LLC
11710 Shadystone Terrace
Mitchellville, MD 20721
646-288-3620

March 24, 2023

This brochure supplement provides information about Roger Rigby, CRD# 7615003 that supplements the Simeon Capital LLC brochure. You should have received a copy of that brochure. Please contact Roger Rigby if you did not receive Simeon Capital LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Roger Rigby is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Educational Background and Business Experience

Roger Rigby, CAIA, Founder, was born in 1979.

Mr. Rigby earned a Bachelor of Science degree in Finance and Management Science & Statistics from the University of Maryland, and a Master's in Business Administration from Columbia Business School.

Prior to founding Simeon Capital LLC in 2020, Mr. Rigby was Senior Vice President, Investment Manager at Citigroup (August 2017 to February 2020), Senior Vice President, Lead Finance Officer at Citigroup (May 2015 to August 2017), Director, Private Markets for TRG Management LP (November 2013 to June 2014), Senior Vice President for Citigroup, Citi Venture Capital International (February 2011 to November 2013), Senior Vice President for Citigroup, Citi Venture Capital International (August 2009 to February 2011), Vice President for Citigroup, Corporate Strategy, EMEA (February 2009 to August 2009), and Financial Management Associate for Citigroup (July 2007 to February 2009).

Mr. Rigby is a Charter Holder of the Chartered Alternative Investment Analyst Association ("CAIA"). The CAIA Charter is a globally-recognized credential for professionals managing, analyzing, distributing or regulating alternative investments. Charter Holders must successfully complete two examinations covering understanding of various alternative asset classes, knowledge of the tools and techniques used to evaluate their risk-return attributes and application of the knowledge and analytics within a portfolio management context.

Item 3 Disciplinary Information

There are no legal or disciplinary events or proceedings to report concerning Mr. Rigby.

Item 4 Other Business Activities

Mr. Rigby is not actively engaged in any investment-related or non-investment-related business or occupation outside of Simeon Capital LLC.

Item 5 Additional Compensation

Mr. Rigby does not receive compensation or other economic benefit from anyone who is not a client for providing advisory services.

Item 6 Supervision

Roger Rigby is the Founder and Chief Compliance Officer of Simeon Capital LLC and can be reached at 646-288-3620 and is the only individual that provides investment advice to clients. As a single person firm, Mr. Rigby cannot be supervised, but is a fiduciary by law and is required to act in the best interests of clients.

Item 7 Requirements for State-Registered Advisers

Mr. Rigby has not been involved in an award or found liable in an arbitration claim, civil, or self-regulatory organization event or administrative proceeding, or been the subject of a bankruptcy petition.