

Item 1 Cover Page

**DISCLOSURE BROCHURE**  
FORM ADV PART 2A



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This brochure provides information about the qualifications and business practices of Vi-Bhakti Ventures doing business as Seva Wealth Management. Being registered as an investment adviser does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us at (720) 985-8930. 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 SEVA WEALTH MANAGEMENT (CRD #338344) IS AVAILABLE ON THE SEC'S WEBSITE AT WWW.ADVISERINFO.SEC.GOV**

## **Item 2: Material Changes**

### **Annual Update**

The Material Changes section of this brochure will be updated annually or when material changes occur since the previous release of the Firm Brochure.

### **Material Changes since the Last Update**

Initial Filing

### **Full Brochure Available**

This Firm Brochure being delivered is the complete brochure for the Firm.

### **Item 3: Table of Contents**

#### **Form ADV – Part 2A – Firm Brochure**

<b>Item 2: Material Changes</b> .....	<b>ii</b>
<b>Item 3: Table of Contents</b> .....	<b>iii</b>
<b>Item 4: Advisory Business</b> .....	<b>1</b>
<b>Item 5: Fees and Compensation</b> .....	<b>4</b>
<b>Item 6: Performance-Based Fees and Side-by-Side Management</b> .....	<b>8</b>
<b>Item 7: Types of Clients</b> .....	<b>8</b>
<b>Item 8: Methods of Analysis, Investment Strategies and Risk of Loss</b> .....	<b>8</b>
<b>Item 9: Disciplinary Information</b> .....	<b>11</b>
<b>Item 10: Other Financial Industry Activities and Affiliations</b> .....	<b>12</b>
<b>Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading</b> .....	<b>12</b>
<b>Item 12: Brokerage Practices</b> .....	<b>13</b>
<b>Item 13: Review of Accounts</b> .....	<b>15</b>
<b>Item 14: Client Referrals and Other Compensation</b> .....	<b>16</b>
<b>Item 15: Custody</b> .....	<b>16</b>
<b>Item 16: Investment Discretion</b> .....	<b>16</b>
<b>Item 17: Voting Client Securities</b> .....	<b>17</b>
<b>Item 18: Financial Information</b> .....	<b>17</b>
<b>Item 19: Requirements for State Registered Advisors</b> .....	<b>17</b>
Brochure Supplement (Part 2B of Form ADV) .....	<b>19</b>

## **Item 4: Advisory Business**

### **Firm Description**

Vi-Bhakti Ventures trade name Seva Wealth Management ("SWM") was founded in 2013 and became a registered investment adviser in 2025, Lisa McCann is a 60% owner and also serves as the firm's Chief Compliance Officer. Jackson Lile is a 40% owner.

### **Types of Advisory Services**

#### **ASSET MANAGEMENT**

SWM offers discretionary asset management services to advisory Clients. In many cases, SWM will directly manage client assets, providing a customized investment program tailored to each Client's individual circumstances. This includes developing investment strategies, selecting securities, determining asset allocation, and continuously monitoring portfolios to ensure alignment with stated investment goals, time horizons, objectives, and risk tolerance. Clients grant SWM discretionary authority under the Investment Management Agreement to implement transactions and make portfolio adjustments as needed in order to carry out the agreed-upon investment strategy. Depending on the client's unique situation, and in addition to directly managing client assets, SWM may work with sub-advisers as described below.

#### **Schwab Managed Account Marketplace®**

In certain cases, SWM may recommend or select third-party investment managers made available through the Schwab Managed Account Marketplace® ("Marketplace"), a program offered by Charles Schwab & Co., Inc. ("Schwab"). The Marketplace is an open-architecture platform that allows registered investment advisers to access and contract directly with a wide variety of independent money managers on behalf of the Client. Schwab does not evaluate, recommend, or endorse the money managers available through the Marketplace. SWM will evaluate, recommend, and monitor any managers to be engaged on behalf of the client.

SWM's use of the Marketplace is intended to provide clients with access to additional investment strategies that may complement SWM's portfolio management services. Clients for whom SWM suggests the engagement of a third-party manager through the Marketplace will be asked to sign an agreement authorizing the creation of their Managed Marketplace Account and the assignment of their account to a particular manager or set of managers. Certain managers will additionally require the Client to enter into a separate agreement directly with those managers.

Applicable fees for the use of third-party investment managers will be disclosed in the client's advisory agreement and/or their Schwab account documentation, and in the ADV Part 2A of the third-party manager.

#### **Model Marketplace**

SWM participates in the Model Marketplace of Charles Schwab & Co., Inc. ("Schwab") or Altruist LLC. SWM may subscribe Client accounts to model portfolios available through the Model Marketplace, including generated portfolios and Third-Party Portfolios, for use by SWM to assist it in managing or advising SWM Client accounts. Model Marketplace and its affiliates do not act as investment advisers or fiduciaries to SWM Clients. SWM is responsible for suitability of all investment decisions and transactions for Client accounts subscribed to Model Marketplace model portfolios.

Item 12 further describes the factors that SWM considers in selecting or recommending broker-dealers for Client transactions and determining the reasonableness of their compensation (*e.g.*, commissions).

## ERISA PLAN SERVICES

SWM provides service to qualified retirement plans including 401(k) plans, 403(b) plans, pension and profit-sharing plans, cash balance plans, and deferred compensation plans as a 3(21) advisor:

**Limited Scope ERISA 3(21) Fiduciary.** SWM may serve as a limited scope ERISA 3(21) fiduciary that can advise, help and assist plan sponsors with their investment decisions. As an investment advisor SWM has a fiduciary duty to act in the best interest of the Client. The plan sponsor is still ultimately responsible for the decisions made in their plan, though using SWM can help the plan sponsor delegate liability by following a diligent process.

### 1. Fiduciary Services are:

- Provide investment advice to the Client about asset classes and investment options available for the Plan in accordance with the Plan's investment policies and objectives. Client will make the final decision regarding the initial selection, retention, removal and addition of investment options. SWM acknowledges that it is a fiduciary as defined in ERISA section 3 (21) (A) (ii).
- Assist the Client in the development of an investment policy statement ("IPS"). The IPS establishes the investment policies and objectives for the Plan. Client shall have the ultimate responsibility and authority to establish such policies and objectives and to adopt and amend the IPS.
- Provide investment advice to the Plan Sponsor with respect to the selection of a qualified default investment option for participants who are automatically enrolled in the Plan or who have otherwise failed to make investment elections. The Client retains the sole responsibility to provide all notices to the Plan participants required under ERISA Section 404(c) (5) and 404(a)-5.
- Assist in monitoring investment options, consistency of fund management and conformance to the guidelines set forth in the IPS and make recommendations to maintain, remove or replace investment options.
- Meet with Client on a periodic basis to discuss the reports and the investment recommendations.

### 2. Non-fiduciary Services are:

- Assist in the education of Plan participants about general investment information and the investment options available to them under the Plan. Client understands SWM's assistance in education of the Plan participants shall be consistent with and within the scope of the Department of Labor's definition of investment education (Department of Labor Interpretive Bulletin 96-1). As such, SWM is not providing fiduciary advice as defined by ERISA 3(21)(A)(ii) to the Plan participants. SWM will not provide investment advice concerning the prudence of any investment option or combination of investment options for a particular participant or beneficiary under the Plan.
- Assist in the group enrollment meetings designed to increase retirement plan participation among the employees and investment and financial understanding by the employees.

SWM may provide these services or, alternatively, may arrange for the Plan's other providers to offer these services, as agreed upon between SWM and Client.

3. SWM has no responsibility to provide services related to the following types of assets (“Excluded Assets”):
  - Employer securities;
  - Real estate (except for real estate funds or publicly traded REITs);
  - Stock brokerage accounts or mutual fund windows;
  - Participant loans;
  - Non-publicly traded partnership interests;
  - Other non-publicly traded securities or property (other than collective trusts and similar vehicles); or
  - Other hard-to-value or illiquid securities or property.

Excluded Assets will **not** be included in calculation of Fees paid to SWM on the ERISA Agreement. Specific services will be outlined in detail to each plan in the 408(b)2 disclosure.

#### FINANCIAL PLANNING AND CONSULTING

SWM offers the following financial planning and consulting services as outlined below:

##### ***Comprehensive Financial Plan***

This service includes a comprehensive written plan that may include the following:

1. **Fee Analysis:** A fee analysis involves reviewing and assessing the costs associated with investment products or services, including management fees, fund expenses, and transaction costs. The goal is to identify potential areas for cost reduction or optimization, ensuring Clients are not paying excessive fees for their investments.
2. **Investment Analysis:** Investment analysis involves evaluating various investment options, such as stocks, bonds, and mutual funds, to determine their risk, return potential, and alignment with the Client’s financial goals. It includes both qualitative and quantitative assessment to build a well-diversified portfolio.
3. **Portfolio Stress Test:** A portfolio stress test simulates various market scenarios, such as economic downturns or volatility, to assess how an investment portfolio would perform under adverse conditions. This helps identify vulnerabilities and ensures the portfolio can withstand significant market fluctuations.
4. **Tax Analysis:** Tax analysis reviews a Client’s current tax situation to identify strategies for minimizing tax liabilities, such as tax-efficient investment strategies, tax loss harvesting, or deductions. This helps optimize the Client's financial plan and overall wealth management.
5. **Social Security Analysis:** Social Security analysis evaluates when and how to begin taking Social Security benefits in order to maximize lifetime benefits. It considers factors such as age, work history, and potential tax implications to determine the optimal strategy.
6. **College Cost Analysis:** College cost analysis projects the future cost of a child’s education, taking into account factors like inflation, scholarships, and funding options. It helps Clients plan and save for tuition, fees, and other related expenses.
7. **Income Analysis:** Income analysis examines the sources and stability of a Client’s income, including wages, dividends, pensions, and other cash flows. It helps ensure that income is sufficient to meet current and future financial needs, factoring in expenses, debt, and savings goals.

8. **Estate Planning Review:** Estate planning review involves assessing a Client’s existing estate plan, including wills, trusts, and beneficiary designations. The goal is to ensure that the estate is structured in the most tax-efficient way and that the Client’s wishes for asset distribution and inheritance are clearly documented.

The individual topics that will be included in this service will be outlined and agreed upon in the financial planning and consulting agreement.

**Consultation Services**

Consultation services are appropriate for Clients who need assistance with individual topics. This is not a detailed financial review and will not provide/result in a complete financial plan. Client may receive a written or verbal report on the topics selected as determined by SWM and the Client and the scope of services provided. Client may select individual topics above, or other topics as may be deemed appropriate.

Services for Comprehensive Financial Plans and Consultation Services are completed and delivered within 30 days contingent upon timely delivery of all required documentation.

When engaging in any financial planning and consulting services, a conflict of interest exists between the interests of the investment advisor and the interests of the Client when a Client is provided one service by SWM and can also be solicited for other services provided by SWM or their affiliated companies. The Client always has the right to decide whether to act upon the investment advisor’s recommendation. If the Client elects to act on any of the recommendations, they always have the right to do it through the professional of their choosing.

**Client Tailored Services and Client Imposed Restrictions**

The goals and objectives for each Client are documented in our Client files. Investment strategies are created that reflect the stated goals and objectives. Clients may impose restrictions on investing in certain securities or types of securities pursuant to the approval of the firm.

Agreements may not be assigned without written Client consent.

**Wrap Fee Programs**

SWM does not sponsor any wrap fee programs.

**Client Assets Under Management**

SWM has the following Client assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$0	\$0	August 20, 2025

**Item 5: Fees and Compensation**

**Method of Compensation and Fee Schedule**

ASSET MANAGEMENT

SWM offers discretionary direct asset management services to advisory Clients. SWM charges an annual investment advisory fee based on the total assets under management, as follows:

Assets Under Management	Annualized Fee	Quarterly Fee
\$0 to \$500,000	1.25%	0.3125%

\$500,000.01 to \$750,000	1.20%	0.3000%
\$750,000.01 to \$1,000,000	1.15%	0.2875%
\$1,000,000.01 to \$1,500,000	1.10%	0.2750%
\$1,500,000.01 to \$2,000,000	1.05%	0.2625%
\$2,000,000.01 to \$3,000,000	1.00%	0.2500%
\$3,000,000.01 to \$4,000,000	0.90%	0.2250%
\$4,000,000.01 to \$5,000,000	0.80%	0.2000%
\$5,000,000.01 to \$10,000,000	0.70%	0.1750%
\$10,000,000.01 to \$15,000,000	0.60%	0.1500%
\$15,000,000.01 to \$20,000,000	0.50%	0.1250%
\$20,000,000.01 and up	0.40%	0.1000%

This is a breakpoint fee schedule; the entire portfolio is charged the same asset management fee. For example, a Client with \$1,750,000 under management would pay the following on a quarterly basis:  $\$1,750,000 \times 0.2625\% = \$4593.75$  for that billing period.

The annualized fee is negotiable based upon certain criteria (e.g., historical relationship, householding of Client accounts, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with Clients, etc.). Clients may combine multiple household accounts to receive a lower tiered schedule. This will be documented on the Investment Advisor Agreement.

SWM bills its fees quarterly in advance based on the value of assets managed as of the close of business on the last business day of the last billing period. In computing the market value of any investment of the Account, each security listed on any national securities exchange or otherwise subject to current last-sale reporting shall be valued at the last sale price on the valuation date. SWM does not itself price any investment or security for which it charges a management fee or that is included in the portfolio return.

#### **Schwab Managed Account Marketplace®**

When SWM engages a third-party manager through the Schwab Managed Account Marketplace® (“Marketplace”), clients will incur fees separate from SWM’s advisory fee. In addition to the fee paid to SWM, clients will pay a separate fee to the third-party manager, which varies depending on the manager selected. SWM will ensure that the total combined fees to the client for SWM and the third-party manager do not exceed 2% annually.

#### **Model Marketplace**

When SWM participates in Model Marketplace to model Clients’ portfolio, Clients may incur additional annual fees separate from SWM’s advisory fee, charged by Schwab or Altruist and debited directly from Clients’ accounts. These fees will vary depending on the specific model portfolio selected, and are calculated monthly based on the average account balance for that month. SWM will ensure that the total combined fees to the client for SWM and Schwab’s or Altruist’s Model Marketplace do not exceed 2% annually.

#### **Fee Payment**

If SWM is authorized or permitted to deduct fees directly from the account by the custodian:

- SWM will provide the Client with an invoice concurrent to instructing the custodian to deduct the fee stating the amount of the fee, the formula used to calculate the fee, the fee calculation, the amount of assets under management the fee is based on and the time period covered by the fee, and the name of the custodian;
- SWM will obtain written authorization signed by the Client allowing the fees to be deducted; and
- The Client will receive quarterly statements directly from the custodian, which disclose the fees deducted.

Please see Item 15 for additional information regarding Custody.

Lower fees for comparable services may be available from other sources. Clients may terminate their agreement within five (5) business days of signing the Investment Advisory Agreement with no obligation and without penalty or fees. After the initial five (5) business days, the agreement may be terminated by SWM with thirty (30) days written notice to Client and by the Client at any time with written notice to SWM. For accounts opened or closed mid-billing period, fees will be prorated based on the days services are provided during the given period. Client shall be given thirty (30) days prior written notice of any change in fees. Any change in fees will be acknowledged in writing by both parties before any change in said fees occurs.

#### ERISA PLAN SERVICES

The annual fees are based on the market value of the Included Assets between 0.25% and 1% as disclosed in Schedule A of the ERISA 3(21) agreement. The annual fee is negotiable and will be charged as a percentage of the Included Assets. Fees may be charged quarterly or monthly in arrears or in advance based on the assets as calculated by the custodian or record keeper of the Included Assets (without adjustments for anticipated withdrawals by Plan participants or other anticipated or scheduled transfers or distribution of assets) based on the close of business on the last business day of the of the month or quarter. If the services to be provided start any time other than the first day of a quarter or month, the fee will be prorated based on the number of days remaining in the quarter or month. Valuations differ depending on whether the account is billed in advance or in arrears. For accounts billed in advance, the value is based on the account balance on the last day of the prior billing period. For accounts billed in arrears, the value is based on the account balance on the last day of the current billing period. If this Agreement is terminated prior to the end of the billing cycle, SWM shall be entitled to a prorated fee based on the number of days during the fee period services were provided or Client will be due a prorated refund of fees for days services were not provided in the billing cycle.

The fee schedule, which includes compensation of SWM for the services is described in detail in Schedule A of the ERISA Plan Agreement. The Plan is obligated to pay the fees, however the Plan Sponsor may elect to pay the fees. Client may elect to be billed directly or have fees deducted from Plan Assets. SWM does not reasonably expect to receive any additional compensation, directly or indirectly, for its services under this Agreement. If additional compensation is received, SWM will disclose this compensation, the services rendered, and the payer of the compensation. SWM will offset the compensation against the fees agreed upon under the Agreement.

## FINANCIAL PLANNING AND CONSULTING

SWM charges either a fixed or hourly fee based on complexity and unique Client needs for financial planning. Prior to the planning process the Client will be provided an estimated plan fee.

### ***Comprehensive Financial Plan***

SWM charges a fixed fee of \$250 - \$10,000 based on complexity and unique Client needs for comprehensive financial plans.

### ***Consultation Services***

SWM charges a standard hourly fee of \$150 per hour.

Fees for financial planning and consulting are billed 50% in advance with the remainder due upon plan delivery and acceptance.

Services are completed and delivered inside of 30 days contingent upon timely delivery of all required documentation. Client may cancel within five (5) business days of signing Agreement with no obligation and without penalty or fees. If the Client cancels after five (5) business days, any unearned fees will be refunded to the Client. SWM reserves the right to waive the fee should the Client implement the plan through SWM.

### **Client Payment of Fees**

Fees for asset management services are:

- Deducted from a designated Client account. The Client must consent in advance to direct debiting of their investment account.

Fees for financial plans will be billed:

- Check – to be remitted by Client to SWM
- Deducted from a non-qualified account managed by SWM
- Electronic Payment via ACH, Debit Card, or Credit Card (fees will be paid via a third party payment processor in which the Client will securely input payment information and pay the advisory fee through a secure portal. SWM will not have continuous access to the Client's banking information.)

### **Additional Client Fees Charged**

Custodians may charge transaction fees on purchases or sales of certain mutual funds, equities and exchange-traded funds. These charges may include mutual fund transactions fees, postage and handling and miscellaneous fees, internal management and administrative fees charged by mutual funds and ETFs (fee levied to recover costs associated with fees assessed by self-regulatory organizations). Margin interest may also apply for Client electing to utilize margin on their account(s). For more details on the brokerage practices, see Item 12 of this brochure.

### **Prepayment of Client Fees**

SWM does not require any prepayment of fees of more than \$500 per Client and six months or more in advance.

Fees for financial plans are billed 50% in advance with the balance due upon plan delivery

Investment management fees are billed quarterly in advance.

Fees for ERISA 3(21) services may be billed in advance pursuant to terms in the agreement.

If the Client cancels after five (5) business days, any unearned fees will be refunded to the Client, or any unpaid earned fees will be due to SWM.

### **External Compensation for the Sale of Securities to Clients**

Investment Advisor Representatives of SWM receive external compensation for sales of investment related products such as insurance as licensed insurance agents. From time to time, they will offer Clients services from those activities.

This represents a conflict of interest because it gives an incentive to recommend products based on the commission received. As insurance agents, investment advisor representatives of the firm do not charge advisory fees on the insurance products they receive a commission on. A conflict exists between SWM and the Client when we are recommending insurance or advisory services to the Client which results in compensation. These types of recommendations will only be made if they are in the Client's best interest. The Client always has the right to decide whether to act upon the recommendations of the firm and has the right to effect the recommendations through the professional of their choosing.

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

#### **Sharing of Capital Gains**

Fees are not based on a share of the capital gains or capital appreciation of managed securities and therefore does not engage in side-by-side management.

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

#### **Description**

SWM generally provides investment advice to individuals, high net worth individuals, businesses, and non-profits. Client relationships vary in scope and length of service.

#### **Account Minimums**

SWM does not require a minimum account value.

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

#### **Methods of Analysis**

Security analysis methods may include fundamental analysis, technical analysis, charting, and cyclical analysis. Investing in securities involves risk of loss that Clients should be prepared to bear. Past performance is not a guarantee of future returns.

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Technical analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not take into account new patterns that emerge over time.

Charting analysis strategy involves using and comparing various charts to predict long and short-term performance or market trends. The risk involved in using this method is that only past performance data is considered without using other methods to crosscheck data. Using

charting analysis without other methods of analysis would be making the assumption that past performance will be indicative of future performance. This may not be the case.

Cyclical analysis assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are twofold: 1) the markets do not always repeat cyclical patterns; and 2) if too many investors begin to implement this strategy, then it changes the very cycles these investors are trying to exploit.

### **Investment Strategy**

Our general investment strategy is to reduce risk and volatility by constructing diversified portfolios consistent with the principles of modern portfolio theory. In implementing this strategy, we may use several methods of analysis. Fundamental analysis focuses on factors that determine a company's value and expected earnings, typically leading to investments in securities believed to be undervalued, though the risk is that the market may not reflect the expected value. Technical and charting analyses seek to identify trends and patterns in past market behavior to anticipate future performance, but both approaches carry the risk that markets may not follow historical patterns or that new trends may emerge. Cyclical analysis assumes that markets move in recurring cycles that can be leveraged for investment decisions, though cycles may not always repeat or may change if widely exploited.

We primarily use exchange-traded funds (ETFs), stocks, and bonds in Client accounts, but may also use mutual funds and other investment vehicles when appropriate to meet the Client's goals, risk tolerance, and investment horizon.

### **Material Risks**

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks and should discuss these risks with SWM:

#### **General Market Risk**

- *Market Risk:* The prices of securities in which Clients invest may decline in response to certain events taking place around the world, including those directly involving the companies whose securities are owned by a fund; conditions affecting the general economy; overall market changes; local, regional or global political, social or economic instability; and currency, interest rate and commodity price fluctuations. Investors should have a long-term perspective and be able to tolerate potentially sharp declines in market value.
- *Interest-rate Risk:* Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- *Inflation Risk:* When any type of inflation is present, a dollar today will buy more than a dollar next year, because purchasing power is eroding at the rate of inflation.
- *Currency Risk:* Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- *Reinvestment Risk:* This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.

- *Liquidity Risk:* Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- *Management Risk:* The advisor's investment approach may fail to produce the intended results. If the advisor's assumptions regarding the performance of a specific asset class or fund are not realized in the expected time frame, the overall performance of the Client's portfolio may suffer.
- *Long-term purchases:* Long-term investments are those vehicles purchased with the intention of being held for more than one year. Typically, the expectation of the investment is to increase in value so that it can eventually be sold for a profit. In addition, there may be an expectation for the investment to provide income. One of the biggest risks associated with long-term investments is volatility, the fluctuations in the financial markets that can cause investments to lose value.
- *Short-term purchases:* Short-term investments are typically held for one year or less. Generally, there is not a high expectation for a return or an increase in value. Typically, short-term investments are purchased for the relatively greater degree of principal protection they are designed to provide. Short-term investment vehicles may be subject to purchasing power risk — the risk that your investment's return will not keep up with inflation.
- *Trading risk:* Investing involves risk, including possible loss of principal. There is no assurance that the investment objective of any fund or investment will be achieved.

### **Security Based Risk**

- *Equity Risk:* Equity securities tend to be more volatile than other investment choices. The value of an individual mutual fund or ETF can be more volatile than the market as a whole. This volatility affects the value of the Client's overall portfolio. Small- and mid-cap companies are subject to additional risks. Smaller companies may experience greater volatility, higher failure rates, more limited markets, product lines, financial resources, and less management experience than larger companies. Smaller companies may also have a lower trading volume, which may disproportionately affect their market price, tending to make them fall more in response to selling pressure than is the case with larger companies.
- *Fixed Income Risk:* The issuer of a fixed income security may not be able to make interest and principal payments when due. Generally, the lower the credit rating of a security, the greater the risk that the issuer will default on its obligation. If a rating agency gives a debt security a lower rating, the value of the debt security will decline because investors will demand a higher rate of return. As nominal interest rates rise, the value of fixed income securities held by a fund is likely to decrease. A nominal interest rate is the sum of a real interest rate and an expected inflation rate.
- *Mutual Fund Risk:* When a Client invests in open end mutual funds or ETFs, the Client indirectly bears their proportionate share of any fees and expenses payable directly by those funds. Therefore, the Client will incur higher expenses, 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). 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 or (ii) 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. Adviser has no control over the risks taken by the underlying funds in which Client invests.

- *Cash and Cash Equivalents Risk:* Cash and cash equivalents consist of investments like money market funds, certificates of deposit (CDs), Treasury bills, and short-term government bonds. They are generally considered low-risk compared to other asset classes. While they offer safety, liquidity, and stability, they come with certain risks, such as inflation, interest rate fluctuations, and opportunity costs.
- *Alternative Investments Risk:* Alternative investments involve a high degree of risk and can be illiquid due to restrictions on transfer and lack of a secondary trading market. They can be highly leveraged, speculative and volatile, and an investor could lose all or a substantial amount of an investment.
- *Options Trading:* The risks involved with trading options are that they are very time sensitive investments. An options contract is generally a few months. Clients should be aware that the use of options involves additional risks. The risks of covered call writing include the potential for the market to rise sharply. In such case, the security may be called away and the account will no longer hold the security. When purchasing options there is the risk that the entire premium paid for the option can be lost if the option is not exercised or otherwise sold prior to the option's expiration date. When selling ("writing") options, the risk of loss can be much greater if the options are written uncovered ("naked"). The risk of loss can far exceed the amount of the premium received for an uncovered option and in the case of an uncovered call option the potential loss is unlimited.

The risks associated with utilizing Sub-Advisors include:

- Manager Risk
  - Sub-Advisor fails to execute the stated investment strategy
- Business Risk
  - Sub-Advisor has financial or regulatory problems

## **Item 9: Disciplinary Information**

### **Criminal or Civil Actions**

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

### **Administrative Enforcement Proceedings**

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

### **Self-Regulatory Organization Enforcement Proceedings**

SWM and its management have not been involved in any self-regulatory organizational enforcement proceedings that are material to a Client's or prospective Client's evaluation of SWM or the integrity of its management.

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

### **Broker-Dealer or Representative Registration**

SWM is not registered as a broker-dealer and no affiliated representatives of SWM are registered representatives of a broker-dealer.

### **Futures or Commodity Registration**

Neither SWM nor its affiliated representatives are registered or have an application pending to register as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

### **Material Relationships Maintained by this Advisory Business and Conflicts of Interest**

Investment Advisor Representatives of SWM have a financial affiliated business as independent insurance agent. They will offer Clients services from this activity. As an insurance agent, they will receive separate yet typical compensation.

This practice represents a conflict of interest because it gives an incentive to recommend products or services based on the compensation received. This conflict is mitigated by disclosures, procedures, and the firm's fiduciary obligation to act in the Client's best interest at all times. Clients always have the right to decide whether to purchase any insurance products. Clients have the option to purchase these products or services through another insurance agent of their choosing.

### **Recommendations or Selections of Other Investment Advisors and Conflicts of Interest**

SWM may engage a Sub-Advisor to manage clients' investment portfolios. The Sub-Advisor is responsible for maintaining the investment models or strategies agreed upon with SWM and executes all trades on behalf of clients in their accounts. SWM retains the overall direct relationship with the client and has the authority to terminate the Sub-Advisor relationship at its discretion.

Fees paid to Sub-Advisors are in addition to SWM's advisory fees. Because these fees are paid directly to the Sub-Advisor and SWM does not receive any portion, it is not considered a conflict of interest for SWM to recommend one model or Sub-Advisor over another.

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

### **Code of Ethics Description**

The employees of SWM have committed to a Code of Ethics ("Code"). The purpose of our Code is to set forth standards of conduct expected of SWM employees and addresses conflicts that may arise. The Code defines acceptable behavior for employees of SWM. The Code reflects SWM and its supervised persons' responsibility to act in the best interest of their Client.

One area which the Code addresses is when employees buy or sell securities for their personal accounts and how to mitigate any conflict of interest with our Clients. We do not allow any employees to use non-public material information for their personal profit or to use internal research for their personal benefit in conflict with the benefit to our Clients.

SWM's policy prohibits any person from acting upon or otherwise misusing non-public or inside information. No advisory representative or other employee, officer or director of SWM may recommend any transaction in a security or its derivative to advisory Clients or engage in personal securities transactions for a security or its derivatives if the advisory representative possesses material, non-public information regarding the security.

SWM's Code is based on the guiding principle that the interests of the Client are our top priority. SWM's officers, directors, advisors, and other employees have a fiduciary duty to our Clients and must diligently perform that duty to maintain the complete trust and confidence of our Clients. When a conflict arises, it is our obligation to act in the Client's best interests.

The Code applies to "access" persons. "Access" persons are employees who have access to non-public information regarding any Clients' purchase or sale of securities, or non-public information regarding the portfolio holdings of any reportable fund, who are involved in making securities recommendations to Clients, or who have access to such recommendations that are non-public.

SWM will provide a copy of the Code of Ethics to any Client or prospective Client upon request.

### **Investment Recommendations Involving a Material Financial Interest and Conflict of Interest**

SWM and its affiliated persons do not recommend to Clients securities in which we have a material financial interest.

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

SWM and its affiliated persons may buy or sell securities that are also held by Clients. In order to mitigate conflicts of interest such as trading ahead of Client transactions, affiliated persons are required to disclose all reportable securities transactions as well as provide SWM with copies of their brokerage statements.

The Chief Compliance Officer of SWM is Lisa McCann. She reviews all trades of the affiliated persons each quarter. The personal trading reviews ensure that the personal trading of affiliated persons does not affect the markets and that Clients of the firm receive preferential treatment over associated persons' transactions.

### **Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest**

SWM does not have a material financial interest in any securities being recommended. However, affiliated persons may buy or sell securities at the same time they buy or sell securities for Clients. In order to mitigate conflicts of interest such as front running, affiliated persons are required to disclose all reportable securities transactions as well as provide SWM with copies of their brokerage statements. The firm and its affiliated persons are prohibited from front running or otherwise in engaging in trading activities that would disadvantage the trading in Client accounts.

The Chief Compliance Officer of SWM is Lisa McCann. She reviews all trades of the affiliated persons each quarter. The personal trading reviews ensure that the personal trading of affiliated persons does not affect the markets and that Clients of the firm receive preferential treatment over associated persons' transactions.

## **Item 12: Brokerage Practices**

### **Factors Used to Select Broker-Dealers for Client Transactions**

SWM selects broker-dealers based on its fiduciary duty to seek best execution for Clients, meaning an obligation to obtain the most favorable terms under the circumstances. Determining best execution involves various factors and is inherently subjective. These factors include the overall direct net economic result to the portfolio, transaction efficiency, the ability to handle large block trades, the operational capabilities of the broker-dealer, the value of an ongoing relationship, and the financial strength and stability of the broker.

In broker selection, SWM considers multiple criteria, including relatively low transaction fees and robust reporting capabilities. While SWM relies on its brokers to provide execution services at the best available prices, lower fees for comparable services may be available elsewhere. Clients are responsible for all custodial fees in addition to the advisory fees charged by SWM. SWM does not receive any portion of trading fees.

SWM provides investment advisory services through brokerage accounts established with Charles Schwab & Co., Inc. (Schwab) and Altruist Financial LLC (“Altruist”), both of which are self-clearing broker-dealers. SWM maintains an institutional relationship with Schwab and Altruist, which offer benefits including a fully digital account opening process, access to a broad range of investments, and integration with software tools that support SWM and its Clients

SWM will require the use of Schwab or Altruist.

- *Research and Other Soft Dollar Benefits*

**Services that benefit you.**

Schwab’s and Altruist’s institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of Client assets. The investment products available through Schwab and Altruist include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our Clients. Schwab’s and Altruist’s services described in this paragraph generally benefit you and your account.

**Services that do not directly benefit you.**

Schwab and Altruist also make available to us other products and services that benefit us but do not directly benefit you or your account. These products and services assist us in managing and administering our Clients’ accounts and operating our firm. They include investment research, both Schwab’s and Altruist’s own and that of third parties. We use this research to service all or a substantial number of our Clients’ accounts, including accounts not maintained at Schwab or Altruist. In addition to investment research, Schwab and Altruist also make available software and other technology that:

- Provides access to Client account data (such as duplicate trade confirmations and account statements)
- Facilitates trade execution and allocates aggregated trade orders for multiple Client accounts
- Provides pricing and other market data
- Facilitates payment of our fees from our Clients’ accounts
- Assists with back-office functions, recordkeeping, and Client reporting

**Services that generally benefit only us.**

Schwab and Altruist also offer other services intended to help us manage and further develop our business enterprise. These services include:

- Educational conferences and events
- Consulting on technology and business needs
- Consulting on legal and compliance related needs
- Publications and conferences on practice management and business succession

- Access to employee benefits providers, human capital consultants, and insurance providers
- Marketing consulting and support

Schwab and Altruist provide some of these services themselves, and will arrange for third-party vendors to provide additional services to us. Schwab and Altruist also discount or waive their fees for some of these services or pay all or a part of a third party's fees. Schwab and Altruist also provide us with other benefits, such as occasional business entertainment for our personnel. If you did not maintain your account with Schwab or Altruist, we would be required to pay for those services from our own resources; such services could include portfolio research software, reporting, billing, and portfolio management software. These services from Schwab and Altruist benefit us because we do not have to produce or purchase them ourselves.

Schwab and Altruist have also agreed to pay for certain technology, research, marketing, and compliance consulting products and services on our behalf, once the value of our Clients' assets in accounts at Schwab or Altruist reaches certain thresholds. These services are not contingent upon us committing any specific amount of business to Schwab or Altruist in trading commissions or assets in custody.

The fact that we receive these benefits from Schwab or Altruist is an incentive for us to require the use of Schwab or Altruist rather than making such a decision based exclusively on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a conflict of interest. In some cases, the services that Schwab or Altruist pays for are provided by an affiliate of ours or by another party that has some pecuniary, financial or other interests in us (or in which we have such an interest). This creates an additional conflict of interest.

We believe, however, that, taken in the aggregate, our selection of Schwab or Altruist as custodian and broker is in the best interest of our Clients. Our selection is primarily supported by the scope, quality, and price of Schwab's or Altruist's services and not because their services benefit only us..

- *Brokerage for Client Referrals*  
SWM does not receive Client referrals from any custodian or third party in exchange for using that broker-dealer or third party.
- *Directed Brokerage*  
SWM does not allow directed brokerage accounts.

### **Aggregating Securities Transactions for Client Accounts**

SWM is authorized in its discretion to aggregate purchases and sales and other transactions made for the account with purchases and sales and transactions in the same securities for other Clients of SWM. All Clients participating in the aggregated order shall receive an average share price with all other transaction costs shared on a pro-rated basis. If aggregation is not allowed or infeasible and individual transactions occur (e.g., withdrawal or liquidation requests, odd-lot trades, etc.) an account may potentially be assessed higher costs or less favorable prices than those where aggregation has occurred.

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

### **Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons Involved**

Account reviews are performed quarterly by the Chief Compliance Officer of SWM, Lisa McCann. Account reviews are performed more frequently when market conditions dictate. Reviews of Client accounts include, but are not limited to, a review of Client documented risk tolerance, adherence to account objectives, investment time horizon, and suitability criteria, reviewing target allocations of each asset class to identify if there is an opportunity for rebalancing, and reviewing accounts for tax loss harvesting opportunities. Additionally, we encourage Clients to meet with us at least annually to discuss changes in their financial situation.

Financial plans generated are updated as requested by the Client and pursuant to a new or amended agreement, SWM suggests updating at least annually.

#### **Review of Client Accounts on Non-Periodic Basis**

Other conditions that may trigger a review of Clients' accounts are changes in the tax laws, new investment information, and changes in a Client's own situation.

#### **Content of Client Provided Reports and Frequency**

Clients receive written account statements no less than quarterly for managed accounts. Account statements are issued by SWM's custodian. Client receives confirmations of each transaction in account from custodian and an additional statement during any month in which a transaction occurs. SWM does not provide additional reports to Clients.

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

#### **Economic Benefits Provided to the Advisory Firm from External Sources and Conflicts of Interest**

SWM receives additional economic benefits from external sources as described above in Item 12.

#### **Advisory Firm Payments for Client Referrals**

SWM does not compensate for Client referrals.

### **Item 15: Custody**

#### **Account Statements**

All assets are held at qualified custodians, which means the custodians provide account statements directly to Clients at their address of record at least quarterly. Clients are urged to carefully compare the account statements received directly from their custodians to any invoice prepared by SWM and alert the firm to any discrepancies.

SWM will never maintain physical custody of Client funds or securities. However, SWM is deemed to have "constructive" custody solely because advisory fees are directly deducted from Client's accounts by the custodian on behalf of SWM as described in Item 5 above.

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

#### **Discretionary Authority for Trading**

SWM has the authority, without obtaining specific Client consent, to determine the securities to be bought or sold and the amounts of those securities, as stated within the Investment Advisory Agreement. SWM also has the discretion to hire, replace, or terminate Sub-Advisors as it deems appropriate to implement the investment strategy for Client accounts.

SWM allows Clients to place certain restrictions, as outlined in the Client's Investment Policy Statement or similar document. These restrictions must be provided to SWM in writing.

The Client approves the custodian to be used and the commission rates paid to the custodian. SWM does not receive any portion of the transaction fees or commissions paid by the Client to the custodian.

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

### **Proxy Votes**

SWM does not vote proxies on securities. Clients are expected to vote their own proxies. The Client will receive their proxies directly from the custodian of their account or from a transfer agent.

When assistance on voting proxies is requested, SWM will provide recommendations to the Client. If a conflict of interest exists, it will be disclosed to the Client. If the Client requires assistance or has questions, they can reach out to the investment advisor representatives of the firm at the contact information on the cover page of this document.

## **Item 18: Financial Information**

### **Balance Sheet**

A balance sheet is not required to be provided to Clients because SWM does not serve as a custodian for Client funds or securities and SWM does not require prepayment of fees of more than \$500 per Client and six months or more in advance.

### **Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients**

SWM has no condition that is reasonably likely to impair our ability to meet contractual commitments to our Clients.

### **Bankruptcy Petitions during the Past Ten Years**

SWM has not had any bankruptcy petitions.

## **Item 19: Requirements for State Registered Advisors**

### **Principal Executive Officers and Management Persons**

The education and business background for firm principal, Lisa McCann can be found in the Part 2B of this Brochure.

### **Outside Business Activities**

The outside business activities for all executive officers and management persons can be found in the Part 2B of this Brochure and in Item 10 above if applicable.

### **Performance Based Fee Description**

Neither SWM nor its management receive performance based fees. Please see Item 6 of the ADV 2A for more information.

### **Disclosure of Material Facts Related to Arbitration or Disciplinary Actions Involving Management Persons**

Neither SWM nor its management have been involved in any arbitration, found to be liable in a civil, self-regulatory, or administrative proceeding:

### **Material Relationship Maintained by this Advisory Business or Management persons with Issuers of Securities**

There are no material relationships with issuers of securities to disclose.

Item 1 Cover Page

**SUPERVISED PERSON BROCHURE**

FORM ADV PART 2B

Lisa McCann



**Office Address:**

6182 S Marion Way  
Centennial, Colorado 80121

**Tel:** (720) 985-8930

**Email:** [Lisa.McCann@Seva-Wealth.com](mailto:Lisa.McCann@Seva-Wealth.com)

November 12, 2025

This brochure supplement provides information about Lisa McCann and supplements the Vi-Bhakti Ventures doing business as Seva Wealth Management brochure. You should have received a copy of that brochure. Please contact Lisa McCann if you did not receive the brochure or if you have any questions about the contents of this supplement.

**ADDITIONAL INFORMATION ABOUT LISA MCCANN (CRD # 7997050) IS AVAILABLE ON THE SEC'S WEBSITE AT [WWW.ADVISERINFO.SEC.GOV](http://WWW.ADVISERINFO.SEC.GOV)**

**Brochure Supplement (Part 2B of Form ADV)  
Supervised Person Brochure**

**Principal Executive Officer – Lisa McCann**

- Year of birth: 1965

**Item 2 - Educational Background and Business Experience**

Educational Background:

- University of Colorado Denver, School of Public Affairs; PhD; Public Affairs; 2012
- Central Michigan University; Masters; Public and Business Administration; 2004
- Yarmouk University; Masters; Social Anthropology; 1991
- University of Michigan; Bachelors; Political Science; 1986

Business Experience:

<b>Name of Firm or Company</b>	<b>Position Held</b>	<b>From Date</b>	<b>To Date</b>
Vi-Bhakti Ventures trade name Seva Wealth Management	Chief Compliance Officer/Investment Advisor Representative	08/2025	PRESENT
Lisa McCann, Sole Proprietor	Insurance Agent	05/2025	PRESENT
Vi-Bhakti Ventures formerly CS Policy and DBA CS Ventures	CEO	12/2013	PRESENT
	Trader in Securities – Options, Futures, Forex, and Options on Futures	03/2020	Present
	Public Policy and Management Consultant See specific consulting engagements below	12/2013	03/2020
Northwestern Mutual	Registered Representative	12/2024	05/2025
Northwestern Mutual	Insurance Agent	11/2024	05/2025
University of Colorado Denver, School of Public Affairs	Instructor and Lecturer	08/2007	12/2021
Colorado Department of Revenue	Senior Policy Consultant and Writer of Policies and Procedures for the Marijuana Enforcement Division, Liquor Enforcement Division, Office of Human Resources, and Auto Industry Division	9/2013	10/2018
Colorado Department of Revenue	Consultant Writer for Major Statutory Working Groups’ Reports – Amendment 64 Task Force Report (available <a href="#">here</a> ); HB 14-1366 Marijuana Edibles Work Group Report, SB16-197 Statutory Working Group on Higher-Strength Beer Sales (available <a href="#">here</a> )	03/2013	12/2017
Denver Health and Hospital Authority	Consultant Interim Director of Health Care Reform Initiatives	06/2016	07/2017
Colorado Department of Revenue	Strategic Planning Consultant to the Hearings Division	03/2016	05/2016

<b>Name of Firm or Company</b>	<b>Position Held</b>	<b>From Date</b>	<b>To Date</b>
The Public Health Institute at Denver Health and the MHHA	Consultant Senior Advisor to, and Interim Executive Director of the Mile High Health Alliance	01/2015	05/2016
Denver Health Foundation	Consultant Senior Advisor to the Planning Group for the Center for Health Equity	07/2015	01/2016
Denver Health and Hospital Authority	Consultant Writer of Denver Health's Strategic Plan and an Update to the Plan	06/2013	02/2015
The Public Health Institute at Denver Health	Consultant Senior Advisor to the Denver Access to Care Task Force	03/2013	12/2014
Denver Department of Public Health and Environment	Consultant Facilitator of Strategic Planning Process and Writer of Strategic Plan for the Community Health Division	04/2014	04/2014
Denver Department of Public Health and Environment	Consultant Writer of Denver's Community Health Improvement Plan (available <a href="#">here</a> )	09/2013	02/2014

### **Item 3 - Disciplinary Information**

Nothing to report.

### **Item 4 - Other Business Activities**

Lisa McMann has a financial affiliated business as independent insurance agent. She will offer Clients services from this activity. As an insurance agent, she will receive separate yet typical compensation.

This practice represents a conflict of interest because it gives an incentive to recommend products or services based on the compensation received. This conflict is mitigated by disclosures, procedures, and the firm's fiduciary obligation to act in the Client's best interest at all times. Clients always have the right to decide whether to purchase any insurance products. Clients have the option to purchase these products or services through another insurance agent of their choosing.

Additionally, Lisa McMann, is the CEO of Vi-Bhakti Ventures, which engages in short-term trading activities involving options, futures, and foreign exchange (forex) markets. These trading activities are conducted independently and are separate from her role at SWM. This activity may involve frequent buying and selling positions to capitalize on market movements.

### **Item 5 - Additional Compensation**

Lisa McCann receives commissions on the insurance products she sells. She does not receive any performance-based fees and does not receive any additional compensation for performing advisory services other than what is disclosed in Item 5 of Part 2A.

### **Item 6 - Supervision**

Since Lisa McCann is the Chief Compliance Officer and Investment Adviser Representative of SWM and is solely responsible for all supervision and formulation and monitoring of investment advice offered to Clients, She will adhere to and abide by all applicable industry regulations in addition to the policies and procedures as described in the firm's Compliance

Manual and Code of Ethics. She can be reached at [Lisa.McCann@Seva-Wealth.com](mailto:Lisa.McCann@Seva-Wealth.com) or (720) 985-8930.

**Item 7 - Requirements for State-Registered Advisors**

Lisa McCann has never been the subject of any civil litigation, arbitration or bankruptcy proceedings.