

FORM ADV PART 2A – FIRM BROCHURE

Senstomi

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Senstomi is the trade name of Jenny Weaver Capital LLC, an SEC-registered investment adviser. This brochure provides information about the qualifications and business practices of Senstomi. If you have any questions about the contents of this brochure, please contact us at support@senstomi.com or 917-771-7197.

The information in this brochure has not been approved or verified by the U.S. Securities and Exchange Commission (SEC) or any state securities authority.

Registration with the SEC does not imply a certain level of skill or training.

Additional information about Senstomi is available at www.adviserinfo.sec.gov by searching CRD #336311.

Item 2 – Material Changes

This is Senstomi's first annual amendment following the initial brochure filing dated November 14, 2025. There are no material changes to report since that filing.

Clarification: Item 13 of this brochure has been updated to more accurately describe how clients access updated recommendations. The prior filing stated that scenario results “refresh automatically” when clients update financial inputs; this language has been corrected to clarify that clients must initiate a re-run of the scenario to receive updated guidance. No change in practice has occurred — the platform has always operated this way.

The scope of services, fee structure, personnel, and all other disclosures in this brochure remain accurate as of the effective date above.

Item 3 – Table of Contents

Omitted in accordance with SEC instructions for brief brochures.

Item 4 – Advisory Business

A. Overview

Senstomi is an SEC-registered Internet investment adviser that provides personalized, non-discretionary digital investment advice through its proprietary web platform. The platform delivers fiduciary-grade guidance to help individuals make informed financial decisions during periods of change.

B. Current Launch Scope

As of this filing, Senstomi offers one active advisory module — “Income Hit.” This module provides rules-based portfolio-allocation guidance for users experiencing income disruption (e.g., job loss, pay reduction, or reduced hours). Recommendations are expressed as target allocation ranges (stocks / bonds / cash percentages) based on user inputs, stated priorities, risk tolerance, and scenario-specific liquidity needs.

Senstomi does not execute transactions, manage assets, or exercise discretionary authority. Clients implement recommendations themselves through their existing financial institutions, considering any tax implications, transaction costs, or account restrictions.

Data inputs: Users enter their financial information directly. The current release does not incorporate market data or external account-data aggregation.

C. Platform Development Stages (Continuity with Original Registration)

At registration, Senstomi disclosed plans to offer multiple scenario types — Can I Afford It?, Brighter Skies or Rocky Roads, Market Jitters, and Money Due. The platform is launching first with the Income Hit module as part of a phased rollout to validate each scenario for fiduciary accuracy and compliance before release.

D. Planned Enhancements

Future releases are expected to introduce:

- Secure, read-only account-data aggregation to streamline input and enable more precise scenario modeling (planned; not active);
- Behavioral-finance frameworks to help clients recognize and manage decision biases (planned; not active); and
- Peer-benchmarking insights to contextualize client choices against anonymized peer trends (planned; not active).

All future account-linking will be read-only and limited to analytical use; Senstomi will never move funds or execute trades.

E. Ownership

Ara J. Berberian owns 100% of Jenny Weaver Capital LLC.

Item 5 – Fees and Compensation

Senstomi operates on a subscription-based pricing model.

- Current fee: \$12 per month for access to the Income Hit module.
- Fees are paid electronically through the platform.
- There are no asset-based fees, commissions, referral payments, or third-party compensation arrangements.
- Pricing may change with at least 30 days' advance notice to subscribers.
- Clients may cancel at any time before the next billing period.

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

Not applicable. Senstomi does not charge performance-based fees and does not manage separate accounts.

Item 7 – Types of Clients

Senstomi serves individual retail investors with no account minimums. The service is intended for clients seeking fiduciary-grade, self-directed guidance via an online interface.

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

Methods of Analysis

Senstomi's investment logic is deterministic and rules-based. Recommendations derive from:

- Modern Portfolio Theory and individual time-horizon analysis;
- A dynamic allocation engine that computes each client's target portfolio from their individual inputs (date of birth, retirement timing, investor persona, and scenario-specific conditions) rather than fixed lookup tables;
- Scenario-specific decision trees and liquidity-based safety overrides; and
- Fiduciary suitability rules that emphasize liquidity and downside protection.

The allocation engine derives a base allocation for each client, which may be further adjusted by scenario-specific safety overrides when liquidity conditions warrant. Both the base allocation and any override adjustments are logged as part of the firm's compliance record for each recommendation.

Behavioral and Peer Insights (Planned)

Senstomi's long-term architecture includes behavioral-finance modules (to mitigate biases such as loss or regret aversion) and peer-benchmarking frameworks (to compare user approaches to anonymized peer groups). These features are planned for future releases and not active.

Technology Integration

The platform uses GPT-based natural-language tools solely to translate deterministic calculations and portfolio logic into plain-English explanations. These AI tools assist with explanation clarity but

do not perform analysis or generate recommendations. All calculations and recommendations are defined by the firm's proprietary rules and reviewed for consistency with fiduciary standards under the Investment Advisers Act of 1940.

Risk of Loss

Investing involves risk, including possible loss of principal. Results may be affected by market volatility, economic conditions, and client implementation choices. Past performance is not indicative of future outcomes. Recommendations assume proper implementation; delays, partial execution, or deviation from guidance may lead to different results.

Technology Risk

As a digital platform, Senstomi is subject to system outages, cybersecurity threats, and data connectivity issues that could affect service availability or data accuracy.

Item 9 – Disciplinary Information

Neither the firm nor its personnel have any disciplinary history to disclose.

Item 10 – Other Financial Industry Activities and Affiliations

The firm and its principal have no material relationships with broker-dealers or financial institutions. The principal may provide unrelated product strategy consulting through Jenny Weaver Capital LLC; these activities are immaterial to the advisory business and fully disclosed.

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

Senstomi has adopted a Code of Ethics consistent with its fiduciary duties under the Investment Advisers Act of 1940. Neither the firm nor its personnel engage in trading that conflicts with client interests or receive compensation linked to specific securities or products. A copy of the Code is available upon request.

Item 12 – Brokerage Practices

Not applicable. Senstomi does not maintain brokerage relationships, direct clients to specific brokers, or receive any form of brokerage compensation. All implementation decisions remain with the client.

Item 13 – Review of Accounts

Clients receive updated scenario results and recommendations by re-running a scenario through the platform after their circumstances change or after updating their financial inputs. The platform does not automatically refresh recommendations without client action.

Audit Trail: All scenario inputs, recommendation outputs, and user actions are logged and retained in accordance with Investment Advisers Act record-keeping requirements.

No human portfolio reviews are performed. Updated analyses are delivered through the application interface rather than traditional account statements.

Item 14 – Client Referrals and Other Compensation

Senstomi does not have referral or solicitor arrangements and receives no compensation from third parties for client referrals. Any future arrangements will be disclosed in advance to affected clients.

Item 15 – Custody

Senstomi does not hold client funds or securities and does not have custody of client assets. The current release relies solely on user-entered information. Planned future releases may permit optional, secure account linking through third-party aggregation services; these features are not yet available. When enabled, such connections will be strictly read-only for viewing balances and holdings only. Senstomi will not have the ability to move funds, execute trades, or access client credentials for external accounts. Clients maintain full control of their assets at all times.

Item 16 – Investment Discretion

Senstomi provides non-discretionary advice only. Clients decide whether and how to implement recommendations.

Item 17 – Voting Client Securities

Not applicable. Clients retain all voting rights for their securities.

Item 18 – Financial Information

Jenny Weaver Capital LLC (d/b/a Senstomi) does not require or solicit prepayment of fees more than six months in advance and has no financial condition that would impair its ability to meet contractual obligations. The firm has never been the subject of a bankruptcy proceeding.

Item 19 – Requirements for State-Registered Advisers

Not applicable. Senstomi is registered with the U.S. Securities and Exchange Commission as an Internet investment adviser under Rule 203A-2(e).

I acknowledge that I have received and reviewed **Senstomi's Form ADV Part 2A (Firm Brochure)**, which describes the firm's advisory business, services, and disciplinary history.