

- Sectional Disclosure Reference Title: Item 1 – Cover Page Disclosure Data.

***R.T. HICKMAN,  
REGISTERED INVESTMENT ADVISER, LLC  
(RTHRIA,LLC)***

96 Forest Place  
Post Office Lockbox 280  
Rochelle Park, New Jersey 07662  
Telephone Number: 1-201-368-3412  
Facsimile Number: 1-201-845-6344  
Robert T. Hickman, Principal of Firm

United States  
Securities & Exchange Commission  
Form ADV Filings

This brochure provides information about the qualifications and business practices of RTHRIA,LLC. If you have any questions about the contents of this brochure, please contact Robert Hickman at 1-201-368-3412. 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 RTHRIA,LLC also is available on the Internet at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Please understand that being “registered” does not imply a certain level of skill or training.

**\*\*\*CAUTIONARY STATEMENT\*\*\***

**Investing in securities involves RISK OF LOSS  
that every prospective investor should first be prepared to bear.**

**DATE OF THIS BROCHURE:**

**As of:**

**March, 2009**

**with revisions as of:**

**December, 2009**

***The RT Hickman  
Financial Companies***

Form ADV      Name of Investment Adviser (the IA): RT Hickman, Registered Investment Adviser, LLC (RTHRIA,LLC)  
Address of the IA:      96 Forest Place, Rochelle Park, New Jersey 07662  
Part 2, Check-The-Box Form Version, Page-1      SEC File Number: 801-55905  
IA's Telephone Number: 1-201-368-3412      Reporting Date of this Form: 3/2009, with 12/2009 Revisions

**"Uniform Application for Investment Adviser Registration"**

"Cover Page CONTINUATION, Cautionary Statements, and, Caveats" (Page 1-continued)

➤ **Sectional Disclosure Reference Title: Item 1 - Cover Page Disclosure Data**

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**SPECIAL DISCLOSURE TO READERS RE: THIS "WEB-BASED" FORM ADV PART-2:**

This version of Form ADV Part-2 is for Web Site presentation purposes, via the "iard.com" system, and in conjunction with individual State securities regulators, which for your further understanding may be academically referenced at "[nasaa.org/About\\_NASAA/Role\\_of\\_State\\_Securities\\_Regulators](http://nasaa.org/About_NASAA/Role_of_State_Securities_Regulators)."

**DESIGN AND FRAMEWORK OF THIS DISCLOSURE DOCUMENT:**

During the fourth quarter of 2008, the SEC instructions for preparation of this Form ADV changed to a new format of presentation. Previously, disclosure data was provided in a "Check-The-Box" format. This new brochure style is in a "List Of Items To Be Narratively Presented and Explained" format.

To understand the makings of this REVISED Form ADV Part-2 brochure, please refer to :  
[www.sec.gov/rules/proposed/2008/ia-2711.pdf](http://www.sec.gov/rules/proposed/2008/ia-2711.pdf).

In previous Form ADV Part 2 brochures, RTH provided comprehensive narrative types of disclosures in pages located after the "Check-The-Box" standardized SEC disclosure pages. In comparison to this new SEC's "List Of Items" disclosure design, many of the new required "Disclosure Items" were already being disclosed in previous RTH Form ADV Part 2 brochures. To adapt to SEC's new Form ADV Part 2 criteria, this brochure is formatted to distinctively present each required "Item Number Disclosure Category" by presenting a TITLE LINE at the beginning of each Section. (For example, see the "Sectional Disclosure Reference Title" line presented at the top of this page).

Since the long-time (tenure) clients of the RTHFC have every year received RTH Form ADV brochures and are familiar with and oriented to the "Check-The-Box" brochure-format, in this Form ADV brochure RTH continues to include the "Check-The-Box" disclosure page presentations. For your reading orientation, please refer to this brochure's page 1B at "Table Of Contents and Disclosure Items Index." The purpose of continuing the "Check-The-Box" pages is to prevent loss of orientation of our current readers.

**LIST OF ACRONYMS AND THEIR MEANINGS:**

(for further definition, refer to "Item 4 – Description of Advisory Business" within this document)

RTHRIA,LLC = R.T. Hickman, Registered Investment Adviser, LLC

RTHFC,LLC = R.T. Hickman Financial Companies, LLC

RTHFC = all RT Hickman company-entities (as a group, or, "in reference to all RT Hickman entities").

RTHSBF,LLC = R.T. Hickman Securities Brokerage Firm, LLC

RTHLIP,LLC = R.T. Hickman, Licensed Insurance Producer, LLC

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Form ADV      Name of Investment Adviser (the IA): RT Hickman, Registered Investment Adviser, LLC RTHRIA, LLC)  
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**"Uniform Application for Investment Adviser Registration"**

"Cover Page CONTINUATION, Cautionary Statements, and, Caveats" (Page 1-continued)

➤ **Sectional Disclosure Reference Title: Item 1 - Cover Page Disclosure Data**

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RTHFEC, LLC = R.T. Hickman Financial & Estate Consultants, LLC

RTH = Robert T. Hickman, the Principal (person) in charge of Operations and Policy in each and all RT Hickman entities.

Distinguishing Note: Some areas within this document may indicate "RTH" with the intended meaning..."as a matter of RTH operating policy, with uniform or general application throughout all of the RTHFC, or, as within the realm of the disclosure-point."

**\*\*\*CAUTIONARY and RISK DISCLOSURE STATEMENT\*\*\***

Financial regulations require RTH to "vet" all RTH-implemented Financial Product Makers, Clearing Firms, Custodian Firms, (and any investment-component third party firm) prior to offering financial implementations to Client/Customers. Although RTH applies vetting procedures, access to needed information is commonly limited due to inadequate transparency. Also, RTH does not possess authority to mandate information from third parties (RTH does not have "authority-of-access"). *Accordingly, the Investor/Client/Customer is hereby strongly cautioned that vetting is only a "best-efforts" undertaking at RTH. It is not a procedure to be relied-on to remove potential flaws and risks.*

Financial regulators usually do have "authority-of-access," however, the Investor is to discern that not all financial firms advance-file their Offerings to financial regulators. Of the ones filed, regulatory Reviewers usually do not verify or place an "approval" onto the Offering/Proposal. In addition, other independent Reviewers that do have "authority-of-access" to the data of financial firms (such as Audit/CPA firms and Rating Agencies) generate information which is inadequate to forestall Risk.

No Client or Investor should ever hesitate to directly call any Investment Maker/Issuer for a copy of their "proof-of-advance-filing-to-Financial Regulator" documentation for any Investment Offering they are considering to acquire. RTH strongly suggests that you carefully conceivably study the maximum potential risk(s) inherent in any investment being considered by you, and to not proceed to invest until you have determined that you can suitably tolerate the magnitude of the investment's maximum potential risk outcome (including the possibility of risks that can be unforeseeable and unpredictable).

RTHRIA, LLC and the RT Hickman Financial Companies (the RTHFC) do not find the process of implementing investments, trading programs, insurances, (i.e. – financial placements) through the use of Disclosure Documents to be adequate or entirely reliable. The RTHFC now instead provide implementations according to a method of "Client-Specific Prescription." Each Client in each implementation prescribes (imposes) a "Customer Suitability Statement" and an "Agreement Document" (these documents being Specific-Prescription records between the Client and us). Although this Form ADV does serve as a Disclosure Document, without execution of client-prescribed Suitability and Agreement documents, this sole Form ADV is inadequate for investment or insurance implementations (including Trading Programs). Product-specific Disclosure Documents from Issuers also are not treated (at the RTHFC) as adequately reliable without the added RT Hickman procedures of "Client-Specific Prescription." Clients that opt to solely rely on any Issuer's Disclosure Documents when working with us, do so at their own risk. The RTHFC disclaim responsibility for Clients that base their implementation(s) through sole reliance on disclosure documents (without the method of "Client-Specific Prescription").

One RISK of relying solely on Disclosure Documents in financial implementations is the risk of omitted or distorted Material Diagnostic Factors. It is always possible for a Disclosure Document to omit a Material Diagnostic Factor. Adding to this risk is the challenge of each Client having their own unique suitability needs. It is not possible for a Disclosure Document to address all unique Client suitability needs. Clients in financial undertakings are to also discern that Filing Approval Desks for Disclosure Documents or Financial Vehicle Communications commonly enforce FORM over SUBSTANCE. Disclosure Documents may be legally-proper in FORM, but inadequate or distorted with respect to actual SUBSTANCE. Clients are hereby alerted that this inadequacy certainly does pose a material RISK.

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Clients are to understand that when doing implemtations with the RTHFC, RT Hickman strives for Substance OVER Form. Financial Disclosure Documents or Communications are to be viewed for the purpose of gathering "Identification Information" about each proposal, but with the aforementioned limitations understood. Clients are to further understand that Communication Documents filed to Financial Regulators usually bear a Disclaimer from the Regulator as to the adequacy of the Proposal. Also, Clients are to also understand that some areas of Financial Regulations EXEMPT the use of Disclosure Documents. In view of these various limitatio ns, the RTHFC are dedicated to the utilization of methods of "Client-Specific Prescription."

**ADDRESSING THE POTENTIAL INHERENT SIGNIFICANT RISKS OF  
NOT GETTING ORDERS PROPERLY FILLED IN THE "BUYS" AND "SELLS" OF INVESTMENTS**

Before any Investor funds any kind of traded investment vehicle, the Investor must first understand the Risk of FAILURE OF GETTING FILLS FOR NEEDED TRADE ORDERS. RTHRIA (and the RTHFC) hereby emphasize that no Investor should proceed to Invest without first understanding this RISK, and further understand that when the Investor proceeds to do any kind of Investing via the RTHFC, the Investor does so in full assumption of this inherent market RISK.

Making or transacting investment positions requires use of available marketplace trading systems and methods (the Exchanges). These venues for executing transactions can fail or be flawed, thus causing unintended results to you, the Participant-Investor. When you proceed to open an Investment account of any kind via RTHRIA or any RTHFC, you do so agreeing to accept ALL of the inherent and disclosed Risks and Cautionary Statements of the proposed Investment, the Custodian, Clearing Facilities, FCMs, Exchanges, and relative Financial Regulators. The Investor also agrees to accepting the "Risk Of Failure(s) of Order-Fills for Needed Trades."

All traded Investments feature the "Risk of failure of getting Fills for needed Trade Orders." One prominent example is understood in the two different types of Trading Program Order Submitters that exist in the industry: (A) the Natural Person Investor-Trader, and, (B) the Unnatural (inhuman, computer-automatic) Trader. When Exchanges and Clearing Parties permit Order Fills by type-(B) Traders, before first executing all type-(A) submitted Trades, type-(A) Traders encounter and bear the Risk of "Fails-To-Fill" (Fails to receive needed Fills). One way this failure occurs is when type-(B) traders consume the needed Investment Vehicle, which would otherwise be available (as observed in Real Time) for the type-(A) Trader. This type of failure can occur relative to Quantity (Volume) and/or Price. The Investor is to understand that when RTHRIA is the provider of a Trading Program or Method, RTHRIA functions according to a type-(A) Trading Program. The magnitude of an RTHRIA-provided Investor-account encountering this Risk is relative to the effectiveness (or otherwise permissiveness) of Legislation, Regulatory Compliance Enforcement, and, effectiveness of Clearing and Custodian Party controls. RTH does not have any control over this Risk. However, (in contrast), those who pursue investing in type-(B) trades or trading programs bear an enormously greater Risk. Type-(B) trades and trading programs can be invalid, and possibly illegal (regardless of how popular or widely-used). Type-(B) investors are to understand that Unnatural Trade Orders can operate in ways similar to an electronic horse race, rather than as a legal Exchange in full respect of property rights issues and similar elements. As type-(B) trades are Filled in ways which trump Exchange and Financial Market legal principles, participating Investor-accounts experience a history of invalid trades, possibly with most being margined and leveraged. As this occurs, type-(B) historical investor statements may not depict actual account status and condition. The type-(B) investor bears a potential Risk Of Loss that extends potentially far beyond the Nominal (nominated) account size/investment amount. For example, if a type-(B) investor had nominated an account size of \$1,000,000., but then if at a later point in time a retroactive re-count of all historical trade fills becomes required to correct wrongly processed fills, with leverage effects (as example), the type-(B) investor could be called to contribute an additional \$9,000,000., ending up with a resulting downvaluation or closing account loss of \$10,000,000.

Another Risk similar to these "Type-A vs Type-B" example is the Risk that exists when "Out-Of-Publicly-Disclosed" (Dark Pool) trades occur in the same Public-Exchange-Traded investments being used by or for Clients. In this situation, the Investment Vehicle's Price and available Volume is affected (manipulated) by non-viewable "Dark Pool" trades. These situations present Risk to the Investor similar to that of the "Type-B" example. And, the Investor is to carefully consider that this Risk can come from Direct as well as Indirect correlative manipulations.

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The prospective Non-Dark-Pool Investor is to understand: Only in engagements of when a Client hires RTHRIA to specifically provide a trading method or a trading program (meaning, done solely by RTH) can RTHRIA promise provision of the type-(A) "Natural" Trading Program method. RTHRIA (and the RTHFC) are NOT providers of type-(B) "Unnatural" or "Dark Pool" Trading Programs or methods. Accordingly, RT Hickman trading programs or methods bear the Risk of failure of getting Fills for needed Trade Orders.

Investors are to distinguish that any investment a Client makes into any non-RT Hickman trading program or method may feature the aforementioned "Type-B" or "Dark Pool" risks.

Investors are to further be alerted that any disclosed information, rule or regulation regarding the integrity or quality of Trade Order Fills and Execution which does not address both "Price" AND "Assurance-Of-Adequacy/Legitimacy-Of-Volume and Availability," is potentially flawed. Assuring the integrity of only one of these two imperatives is inadequate. Such flaws can be enourmously risky, and extend potentially beyond the amount of funds that the Investor intended (nominated) to actually have at Risk.

**DISCLOSURES RE: FINANCIAL and DISCIPLINARY INFORMATION:**

**Financial Condition**

Financial Conditions that are reasonably likely to impair the ability of RTHRIA,LLC to meet contractual commitments of Clients:

- RTHRIA,LLC only provides Services to Clients, usually on a month-to-month basis. RTHRIA and the RTHFC do not provide Custodian, Trade Clearing, Margin, Collateralization or Lein Arrangements, or any other service that calls-for a Reserve-Requirement. RTHRIA Agreements with respect to Fees are usually Monthly, without Lock-up conditions, without Front or Back (load) charges, with all Fees advance-disclosed. Monthly Fee Charges are usually whole-month assessments. Based on these limited offered services, Reserve-Requirement or Financial Condition types of disclosures do not apply.

- RTHSBF,LLC, as under formal agreement with FINRA, is only an "Applications-Way" Broker-Dealer (B/D). RTHSBF does not provide Custodian, Trade Clearing, Margin, Collateralization or Lien Arrangements, or any other service that calls-for a Reserve-Requirement. FINRA has required RTHSBF to maintain a \$5,000 minimum Net Capital; however, in view of RTHSBF being only an "Apps-Way" B/D, this Net Capital requirement should not be interpreted as the kind of Reserve-Requirement of financial firms and institutions that actually Hold or have Collateralized Lien Arrangements with Client or Customer funds. RTHSBF,LLC is required to be a Member of the Securities Investor Protection Corporation, however, Clients are to distinguish SIPC's coverage being for replacement of missing Stocks or Other Securities. SIPC publishes its booklet "How SIPC Protects You" at [www.sipc.org](http://www.sipc.org). A copy of RTHSBF's "For Public Inspection" financial statement is enclosed.

- RTHRIA,LLC and RTHSBF,LLC maintain Fidelity Bond coverages.

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**"Uniform Application for Investment Adviser Registration"**

"Cover Page CONTINUATION, Cautionary Statements, and, Caveats" (Page 1-continued)

➤ **Sectional Disclosure Reference Title: Item 1 - Cover Page Disclosure Data**

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**Legal or Disciplinary Events**

- RTHRIA,LLC and RTHSBF,LLC register chronologies of Legal or Disciplinary events within the following national financial-registry web-sites:

For RTHRIA,LLC:

[www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) (for Securities Industry matters)

and

[www.futures.org/basic](http://www.futures.org/basic) (for Futures/Contracts Industry matters).

For RTHSBF,LLC:

<http://brokercheck.finra.org> (for Broker-Dealer Securities Industry matters).

To assist a reviewer with the above web-site references, "Hotline-Brochures" of the above are enclosed with this document.

**\*\*\*CAVEAT\*\*\***

Any reliance on these documents is subject to "authentication" which RT Hickman establishes via effective dated delivery of a Hard Copy, complete with all RT Hickman required accompanying supplemental disclosure documents (to requesting Users intending to engage RT Hickman). See "Additional Disclosures" at Schedule-F of this document. The Investment Adviser Registration Depository (the "IARD") required (for State requirements) RT Hickman's Form ADV Part-2 to be loaded into IARD's electronic (web-based) document containment and access system in a format and design that is not representative of RT Hickman's actual Form ADV. Also, since this document is a "web-based electronic file" in a realm of distortionability, this ADV Part-2 presentation is not "legally evidential." The security settings in this document and relative internet transmission venues are within a range of "imperfect" to "no security at all." Accordingly, every reader is to understand that this ADV document does not present RT Hickman's actual Form ADV Part-2, meaning, this document is not to be relied on as RT Hickman's actual (authentic) Form ADV Part-2. Web-based readers are hereby further cautioned that the propensity for disclosure unreliability is even greater when resorting to general web-search (non-regulator search engine) methods that are outside of a secure regulatory database, and therefore, any such information is entirely disclaimed by RT Hickman, being that it is also unauthenticated by RT Hickman.

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Form ADV  
Part 2

Name of Investment Adviser (the IA): RT Hickman, Registered Investment Adviser, LLC  
SEC File Number: 801-55905  
IA's Telephone Number: 1-201-368-3412 Reporting Date of this Form: 3/2009, with 12/2009 revisions

"Part-II, Page-1A"

➤ **Sectional Disclosure Reference Title: Item 2 – Reference List of Material Changes, Revisions, or Restatements**

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**Reference List of Material Changes, Revisions, or Restatements**

**FROM:** Previous Form ADV, Part-2, dated March/2009

**TO:** This Form ADV, Part-2, dated December/2009

**NEW DISCLOSURES ADDED:**

- "LIST OF ACRONYMS AND THEIR MEANINGS" added in "DESIGN AND FRAMEWORK OF THIS DISCLOSURE DOCUMENT" section, at Item 1.
- The "Client-Specific Prescription Method of Providing Implementations," and, "Addressing the Potential Inherent Significant Risks of Not Getting Orders Properly Filled in the Buys and Sells of Investments" sections added in the "CAUTIONARY AND RISK DISCLOSURE STATEMENT" section, at Item 1.
- "DISCLOSURES RE: FINANCIAL AND DISCIPLINARY INFORMATION" added in Item 1 area.

**PREVIOUS DISCLOSURES THAT HAVE BEEN MATERIALLY CHANGED:**

- Description of Advisory Business section at Item 4.
- At Item 16 and all other areas that had referenced RTHRIA,LLC's "Active Speculation Positioning System," are changed to RTHRIA,LLC's "Active Positioning Speculative Investing System." (The "Active Speculation Positioning System" is nullified and uneffectuated).

**PREVIOUS DISCLOSURES REMOVED:**

- NONE.

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➤ **Sectional Disclosure Reference Title: Items 3 & 19 - Table of Contents and Disclosure Items Index**

**Table Of Contents and Disclosure Items Index**

<u>Disclosure Topic Item(s)</u>	<u>Page</u>	<u>Required Disclosure "List of Items &amp; Numbers"</u>
Brochure Cover Page, and, Cover Page Continuation.....	1	Item 1
Reference List of Material Changes from Previous (Last) Form ADV-Part 2.....	1A	Item 2
Table Of Contents and Disclosure Items Index.....	1B	Items 3 & 19
Description of Advisory Business, Fees, Compensation, Performance Fees, & Side-By-Side Mgt..	2	Items 4,5,6, & 12
Types of Clients.....	2	Items 4 & 7
Types of Investments.....	3	Item 4
Methods of Analysis, Sources of Information, Investment Strategies, and Risk Of Loss.....	3	Items 4 & 8
Education and Business Standards.....	4	Items 9 & 10
Education, Business Background, and Disciplinary History.....	4	Items 9 & 10
Other Business Activities.....	4	Items 9 & 10
Other Financial Industry Activities or Affiliations, Custody, & Margin Accounts.....	4	Items 9, 10, & 15
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Balance Sheet.....	6	Items 5,12,14,&18
Continuation Sheets.....		Schedule F pages.

To further understand the above List Of Disclosure Items and Item Numbers, please refer to:  
[www.sec.gov/rules/proposed/2008/ia-2711.pdf](http://www.sec.gov/rules/proposed/2008/ia-2711.pdf).

Filing of Adviser disclosures to each State is done via Form ADV Part-1, via the IARD System. RTHRIA,LLC also sends a hard copy of all ADV disclosures to States that accept hard copies, via US Postal Certified Mail.

(Schedules A,B,C,D, and E are included with Part I of this Form ADV, for the use of regulatory bodies, and are not distributed to clients).

The previous SEC-designed version Form ADV Part 2 pages (meaning the "Check-The-Box" style pages) within this brochure were prepared based on U.S. OMB Document Number 3235-0049.

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➤ **Sectional Disclosure Reference Title: Item 4 – Description of Advisory Business**

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RTHRIA, LLC is the Investment Advisory Services entity within the group of RT Hickman Financial Companies. RTHRIA, LLC is 100% owned by Robert T. Hickman. A synopsis and summary history of the RT Hickman Financial Companies is as follows:

- R. T. Hickman, Registered Investment Adviser, LLC (a NFA Member, Registered Commodity Trading Advisor (Commodity Futures Trading Commission) Firm; and, Securities and Exchange Commission Registered Investment Adviser Firm);
- R. T. Hickman Securities Brokerage Firm, LLC (a Financial Industry Regulatory Authority (FINRA)/ National Association of Securities Dealers (NASD) Member securities brokerage firm);
- R. T. Hickman, Licensed Insurance Producer, LLC (an Insurance Production/Broker firm).
- R. T. Hickman Financial & Estate Consultants, LLC (a Financial Consulting Services firm for Businesses, Individuals, Trusts & Estates, and Employee Benefit Plans);
- R. T. Hickman Financial Companies, LLC (a Holding Company serving the above list of Professional Financial Services/Practice Firms).

Please further understand from the above list of RTH companies that, with respect to investments, RTH activities operate under the categoric regulatory domains (of rules) of (a) the SEC and FINRA, and (b) the CFTC and NFA.

Robert T. Hickman is the 100% Owner and Chief Executive Officer (Executive Member and Executive Principal) of these companies.

A schedule of Mr. Hickman's Professional Credentials and Designations accompanies this ADV Part II. (See reference page identified as Schedule D, Page 2, Item 7). Mr. Hickman formerly owned a CPA Firm over the years 1982-1989, which was a concentrated practice in financial consulting and estate consulting engagements. The name of this firm was "R.T. Hickman, Certified Public Accountant," which conducted business as a Proprietorship Entity. This Firm was sold at the close of 1989. In 1990, Mr. Hickman started a new company (R. T. Hickman Financial & Estate Consultants) which over the years has grown into the R. T. Hickman Financial Companies. Mr. Hickman has been the CEO of these companies continuously. He received his Bachelors Degree in Accounting from The William Paterson University of N.J., and, accomplished schooling for Certified Financial Planning through Fairleigh Dickinson University and the Denver College of Financial Planning. Each Financial License and Professional Designation requires Mr. Hickman to earn a minimum number of Continuing Professional Education Credits. Accordingly, over the years Mr. Hickman has been a continuous student in diverse but focused financial studies. Please also refer to Section entitled: LIST OF PROFESSIONAL CREDENTIALS AND DESIGNATIONS (of the R. T. Hickman Financial Firms, and of Robert T. Hickman).

During the 1990s, RT Hickman Financial & Estate Consultants was filed as a Registered Investment Adviser with the SEC prior to the inception of RTHRIA, LLC.

"Form ADV-II, Part-2, Page-2 (continued)

➤ **Sectional Disclosure Reference Title: Item 4 – Description of Advisory Business**

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Every service provided is implemented according to (1) "Client-Specific Prescriptions" via a Client or Customer's Suitability Statement ; and, (2) an Agreement Document. We believe that suitability diagnostics are an imperative to client/customer and financial marketplace integrity. From these procedures, every service/implementation is tailored to every client's needs by virtue of their provided Suitability Statement Forms. Also, client restrictions become self-evident by the data and answers they provide on their Suitability Statement Forms. Each client's suitability statement forms are also used to surface the kinds of investments that the client would consider to be "restricted." Each customer suitability statement endeavors to have every investor to plan each implementation not only on the merits of each investment placement, but also via a suitability of integration within the client/customer's provided (unique) financial profile. Client-Specific Prescription records are treated as confidential records.

RTHRIA, LLC can manage investments on a discretionary or non-discretionary basis, and, RTH is capable of providing many different kinds of investment or account management services, including trading techniques. Currently, the only discretionary services currently provided by RTHRIA, LLC are to clients that qualify and have decided to invest in the RTHRIA-Active Positioning Speculative Investing System (the RTHRIA-APSIS, or, "APSIS"). Discretionary services of RTH are enacted only after execution of Power of Attorney documentation. "APSIS" is a securities investment method that is enhanced through the use of Futures and Options-On-Futures broad-based indices contracts techniques (contracts trades which function in separate regulated public exchange marketplaces from securities). "APSIS" applies only to client/customers who qualify for speculative trading methods. The contracts component(s) of "APSIS" are provided via RTHRIA, LLC, as a Commodity Trading Advisor (CTA) registered with the Commodity Futures Trading Commission (the CFTC), with membership in the National Futures Association (the NFA).

Currently, all other RTH client/customer accounts are Nondiscretionary.

A categoric disclosure of RTH's types and range of services is presented in the following section which is a design-continuation of the "Check-The-Box" style SEC Form ADV Part-2 version.

RTH has been in various financial services businesses for numerous years. RTH is able to provide various types of financial services, and accordingly, this brochure is designed for the purpose of describing these service capabilities and experiences. Clients select (many times on the basis of prevailing market, economic, social, etc conditions) the kinds of or categories of service is they wish to inquire-of or obtain from RTH. Every client, like every implementation, must first be qualified. Each client's Customer Suitability Statement Form, with profile data, enacts these determinations.

Form ADV  
Part 2

Name of Investment Adviser (the IA): RT Hickman, Registered Investment Adviser, LLC  
SEC File Number: 801-55905  
IA's Telephone Number: 1-201-368-3412 Reporting Date of this Form: 3/2009, with 12/2009 revisions  
(Please distinguish: This is a "Check-The-Box" form version page)  
"Part-II, Page-2(A)"

➤ **Sectional Disclosure Reference Title: Items 4, 5, and 6 – Description of Advisory Business, Fees, Compensation, Performance Fees, and Side-By-Side Management**

1. A. Advisory Services and Fees. (check the applicable boxes) For each type of service provided, state the approximate % of total advisory billings from that service. (See instruction below.)

Applicant:

- |   |     |
|---|-----|
| <input checked="" type="checkbox"/> (1) Provides investment supervisory services.....   | 1%  |
| <input checked="" type="checkbox"/> (2) Manages investment advisory accounts not involving investment supervisory services.....   | 99% |
| <input checked="" type="checkbox"/> (3) Furnishes investment advice through consultations not included in either service described above.....                                     | 0%  |
| <input type="checkbox"/> (4) Issues periodicals about securities by subscription.....   | %   |
| <input type="checkbox"/> (5) Issues special reports about securities not included in any service described above.....   | %   |
| <input type="checkbox"/> (6) Issues, not as part of any service described above, any charts, graphs, formulas, or other devices which clients may use to evaluate securities..... | %   |
| <input type="checkbox"/> (7) On more than an occasional basis, furnishes advice to clients on matters not involving securities.....   | %   |
| <input type="checkbox"/> (8) Provides a timing service.....   | %   |
| <input type="checkbox"/> (9) Furnishes advice about securities in any manner not described above.....   | %   |

(Percentages should be based on applicant's last fiscal year. If applicant has not completed its first fiscal year, provide estimates of advisory billings for that year and state that the percentages are estimates.)

- B. Does applicant call any of the services it checked above financial planning or some similar term?..... Yes No  
\_\_\_\_\_ ☒ ☐

- C. Applicant offers investment advisory services for: (check all that apply)

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> (1) A percentage of assets under management | <input type="checkbox"/> (4) Subscription fees  |
| <input type="checkbox"/> (2) Hourly charges                                     | <input type="checkbox"/> (5) Commissions  |
| <input type="checkbox"/> (3) Fixed fees (not including subscription fees)       | <input checked="" type="checkbox"/> (6) Other: C6(A) Fee designs on a project-by-project basis. |

C.(continued) ☒ 6 (B) Performance fees, based on a % of monthly gains, to Qualified Clients only.  
(See "APSYS", described previously in Item 4 section).

- D. For each checked box in A above, describe on Schedule F:

- \* the services provided, including the name of any publication or report issued by the adviser on a subscription basis or for a fee
- \* applicant's basic fee schedule, how fees are charged and whether its fees are negotiable
- \* when compensation is payable, and if compensation is payable before service is provided, how a client may get a refund or may terminate an investment advisory contract before its expiration date

Form ADV

Name of Investment Adviser (the IA): RT Hickman, Registered Investment Adviser, LLC

Part 2

SEC File Number:

801-55905

IA's Telephone Number: 1-201-368-3412 Reporting Date of this Form: 3/2009, with 12/2009 revisions

(Please distinguish: This is a "Check-The-Box" form version page)

"Part-II, Page-2(A)" - (continued)

➤ **Sectional Disclosure Reference Title: Items 4, 5, and 6 – Description of Advisory Business, Fees, Compensation, Performance Fees, and Side-By-Side Management**

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2. Types of clients – Applicant generally provides investment advice to: (check those that apply)

☒ A. Individuals

☒ E. Trusts, estates, or charitable organizations

☐ B. Banks or thrift institutions

☒ F. Corporations or business entities other than those listed above

☐ C. Investment companies

☐ G. Other (describe on Schedule F)

☒ D. Pension and profit sharing plans

---

**THIS AREA IS INTENTIONALLY LEFT BLANK.**

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Answer all items. Complete amended pages in full, Amended items are listed at page 1A of this Form.

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Form ADV  
Part 2

Name of Investment Adviser (the IA): RT Hickman, Registered Investment Adviser, LLC  
SEC File Number: 801-55905  
IA's Telephone Number: 1-201-368-3412 Reporting Date of this Form: 3/2009, with 12/2009 revisions  
(Please distinguish: This is a "Check-The-Box" form version page)  
"Part-II, Page-3"

➤ **Sectional Disclosure Reference Title: Items 4 & 8 - Description Of Advisory Business, Methods Of Analysis, Investment Strategies, and Risk Of Loss**

3. Types of Investments. Applicant offers advice on the following: (check those that apply)

- |  |  |                 |
|--|--|-----------------|
| <input type="checkbox"/> A. Equity securities  | <input checked="" type="checkbox"/> H. United States government securities |                 |
| <input checked="" type="checkbox"/> (1) exchange-listed securities                         | I. Options contracts on:   |                 |
| <input checked="" type="checkbox"/> (2) securities traded over-the-counter                 | <input checked="" type="checkbox"/> (1) securities                         | RE: I & J:      |
| <input checked="" type="checkbox"/> (3) foreign issuers                                    | <input checked="" type="checkbox"/> (2) commodities                        | These checked   |
| <input type="checkbox"/> B. Warrants   | J. Futures contracts on:   | answers pertain |
| <input checked="" type="checkbox"/> C. Corporate debt securities (other than comrcd paper) | <input type="checkbox"/> (1) tangibles                                     | to CTA          |
| <input checked="" type="checkbox"/> D. Commercial paper                                    | <input checked="" type="checkbox"/> (2) intangibles                        | accounts only.  |
| <input checked="" type="checkbox"/> E. Certificates of deposit                             | K. Interests in partnerships investing in:                                 |                 |
| <input checked="" type="checkbox"/> F. Municipal securities                                | <input type="checkbox"/> (1) real estate                                   |                 |
| G. Investment company securities:  | <input type="checkbox"/> (2) oil and gas interests                         |                 |
| <input checked="" type="checkbox"/> (1) variable life insurance                            | <input type="checkbox"/> (3) other (explain on Schedule F)                 |                 |
| <input checked="" type="checkbox"/> (2) variable annuities                                 | L. Other (explain on Schedule F)   |                 |
| <input checked="" type="checkbox"/> (3) mutual fund shares                                 |  |                 |

4. Methods of Analysis, Sources of Information, and Investment Strategies. N/A. Individual security analyses are delegated to third-party Professional Money Managers and Security Analysts. Also, refer to Schedule-H, Wrap Fee Brochure disclosures.

A. Applicant's security analysis methods include: (check those that apply)

- |  |  |
|--|--|
| (1) <input type="checkbox"/> Charting    | (4) <input type="checkbox"/> Cyclical                      |
| (2) <input type="checkbox"/> Fundamental | (5) <input type="checkbox"/> Other (explain on Schedule F) |
| (3) <input type="checkbox"/> Technical   |  |

B. The main sources of information applicant uses include: (check those that apply)

- |   |   |
|---|---|
| (1) <input checked="" type="checkbox"/> Financial newspapers and magazines    | (5) <input type="checkbox"/> Timing services  |
| (2) <input type="checkbox"/> Inspections of corporate activities              | (6) <input checked="" type="checkbox"/> Annual reports, prospectuses, filings with the Securities and Exchange Commission |
| (3) <input checked="" type="checkbox"/> Research materials prepared by others | (7) <input checked="" type="checkbox"/> Company press releases  |
| (4) <input checked="" type="checkbox"/> Corporate rating services             | (8) <input checked="" type="checkbox"/> Other (explain on Schedule F) - Emerging event data.                              |

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"Part-II, Page-3" (continued)

➤ **Sectional Disclosure Reference Title: Items 4 & 8 - Description Of Advisory Business, Methods Of Analysis, Investment Strategies, and Risk Of Loss**

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C. The investment strategies used to implement any investment advice given to clients include: (check those that apply)

- |  |   |
|--|---|
| (1) <input checked="" type="checkbox"/> Long term purchases<br>(securities held at least a year) | (5) <input checked="" type="checkbox"/> Margin transactions   |
| (2) <input checked="" type="checkbox"/> Short term purchases<br>(securities sold within a year)  | (6) <input checked="" type="checkbox"/> Option writing, including covered options,<br>uncovered options or spreading strategies |
| (3) <input checked="" type="checkbox"/> Trading (securities sold within 30 days)                 | (7) <input type="checkbox"/> Other (explain on Schedule F)  |
| (4) <input checked="" type="checkbox"/> Short sales  | RE: 5 & 6: These checked answers pertain to IA with CTA<br>accounts only.   |
- 

**\*\*\*CAUTIONARY STATEMENT\*\*\***

**Investing in securities involves RISK OF LOSS that every  
prospective investor should first be prepared to bear.**

In conjunction with the above-disclosed (Page 3) "Check-The-Box" disclosures (RE: types of investments, methods of analysis, main sources of information, and investment strategies), the reader is to additionally refer to the accompanying RTHRIA,LLC document entitled: "Investment Advisory Services Engagement Agreement."

In order to intensively address an investor's understanding of any investment's RISKS and potential for "downvaluations," RTH has every client provide to RTH prior to placement the RTH Form entitled "Customer Suitability Statement." The prepared "Customer Suitability Statement" serves to ferret-out the risks contained within any investment, (but specifically for the intended investment), with these risks then presented to and by the investor for advance analysis and approval (or declination).

With respect to Investor-Client positions in Cash, currently, all RTHRIA clientele Securities Accounts are nondiscretionary, self-directing investors.

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Answer all items. Complete amended pages in full. Amended items are listed at page 1A of this Form.

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Form ADV  
Part 2

Name of Investment Adviser (the IA): RT Hickman, Registered Investment Adviser, LLC  
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**(Please distinguish: This is a "Check-The-Box" form version page)**  
"Part-II, Page-4"

➤ **Sectional Disclosure Reference Title: Items 9,10,& 15 – Disciplinary Information, Financial Industry Activities and Affiliations (incl. Education/Background), and Custody of Client Funds or Securities**

5. Education and Business Standards.

Are there any general standards of education or business experience that applicant requires of those involved in determining or giving investment advice to clients?..... ☒ Yes ☐ No  
(If yes, describe these standards on Schedule F.)

6. Education and Business Background, including Disciplinary Information.

For:

- \* each member of the investment committee or group that determines general investment advice to be given to clients, or
- \* if the applicant has no investment committee or group, each individual who determines general investment advice given to clients (if more than five, respond only for their supervisors)
- \* each principal executive officer of applicant or each person with similar status or performing similar functions.

On Schedule F, give the:

- |                 |  |
|-----------------|--|
| * name          | * formal education after high school               |
| * year of birth | * business background for the preceding five years |

7. Other Business Activities. (check those that apply)

- ☐ A. Applicant is actively engaged in a business other than giving investment advice.
- ☐ B. Applicant sells products or services other than investment advice to clients.
- ☐ C. The principal business of applicant or its principal executive officers involves something other than providing investment advice.  
(for each checked box describe the other activities, including the time spent on them, on Schedule F.)

8. Other Financial Industry Activities or Affiliations. (check those that apply)

- ☐ A. Applicant is registered (or has an application pending) as a securities broker-dealer.
- ☒ B. Applicant is registered (or has an application pending) as a futures commission merchant, commodity pool operator or commodity trading adviser.
- C. Applicant has arrangements that are material to its advisory business or its clients with a related person who is a:
  - ☒ (1) broker-dealer
  - ☐ (2) investment company
  - ☐ (7) accounting firm
  - ☐ (8) law firm

Form ADV  
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(Please distinguish: This is a "Check-The-Box" form version page)  
"Part-II, Page-4" (continued)

➤ **Sectional Disclosure Reference Title: Items 9,10,& 15 – Disciplinary Information, Financial Industry Activities and Affiliations (incl. Education/Background), Custody of Client Funds or Securities, and, Margin Accounts**

8. Other Financial Industry Activities or Affiliations. (check those that apply)

- ☐ A. Applicant is registered (or has an application pending) as a securities broker-dealer.
- ☒ B. Applicant is registered (or has an application pending) as a futures commission merchant, commodity pool operator or commodity trading adviser.
- C. Applicant has arrangements that are material to its advisory business or its clients with a related person who is a:
- |   |  |
|---|--|
| <input checked="" type="checkbox"/> (1) broker-dealer   | <input type="checkbox"/> (7) accounting firm                                       |
| <input type="checkbox"/> (2) investment company   | <input type="checkbox"/> (8) law firm  |
| <input type="checkbox"/> (3) other investment adviser   | <input checked="" type="checkbox"/> (9) insurance company or agency                |
| <input checked="" type="checkbox"/> (4) financial planning firm   | <input type="checkbox"/> (10) pension consultant                                   |
| <input checked="" type="checkbox"/> (5) commodity pool operator, commodity trading adviser or futures commission merchant | <input type="checkbox"/> (11) real estate broker or dealer                         |
| <input type="checkbox"/> (6) banking or thrift institution  | <input type="checkbox"/> (12) entity that creates or packages limited partnerships |

(For each checked box in C, on Schedule F identify the related person and describe the relationship and the arrangements.)

D. Is applicant or a related person a general partner in any partnership in which clients are solicited to invest? Yes No  
☐ ☒

(If yes, describe on Schedule F the partnerships and what they invest in.)

**Item 15: Custody of Client Funds or Securities**

In all RTH business, Client assets (funds, securities, etc.) are held within financial firms (institutions) that qualify (under laws and regulations) to serve the **highly important** function of Custody. These entities are called "Custodian Firms." Usually, Investment Product Issuer Firms and/or Clearing Broker-Dealer or Futures Commission Merchant firms evaluate, select, and appoint "Custodian Firms." Based on this arrangement, these firms directly send periodic Account Statements to RTH clients. IN ALL CASES, RTH REQUIRES CLIENTS (more specifically, the Account Owners) TO RECEIVE DELIVERY OF THESE REPORTING ACCOUNT STATEMENTS. CLIENTS ARE REQUIRED BY RTH TO CAREFULLY AND TIMELY REVIEW ALL STATEMENTS RECEIVED. RTH DOES NOT ALLOW CLIENTS TO OPT-OUT OF RECEIVING ACCOUNT STATEMENTS. Respectfully, Clients are to understand that when they do not receive and timely review their Account Statements, they add significant RISK to their Accounts.

See also "Review Of Accounts" presented at Page-5, #11 of this brochure.

**ITEM 15 IS CONTINUED ON NEXT PAGE**



"Part-II, Page-4" (continued)

- **Sectional Disclosure Reference Title: Items 9,10,& 15 – Disciplinary Information, Financial Industry Activities and Affiliations (incl. Education/Background), Custody of Client Funds or Securities, and, Margin Accounts**
- 

**Item 15 (continued):**

**When You Have a Margin Account:**

**(Introductory information points to Clients, Customers, and Investors who are interested in utilizing a Margin Account)**

- Clearing Firms may use the Securities you own in your Margin Account to lend them to other Investors. Generally speaking, Securities Lending Arrangements are configured by provisional financial market institutions to enable real-time transactional liquidity and perpetual fluidness in financial markets.
- If the Clearing Firm compensates you for the lending of your Securities, the Clearing Firm discloses this compensation directly to you in its Disclosure Documents (which may be provided via online (internet-reported) disclosures and/or via tangible documentary disclosures). However, the Margin Account Owner is to distinguish that Margin Account Owners are not themselves operating in business as a Securities Lender.
- Loaned Margin Account Securities, generally speaking, function through Contracts existing between the Clearing Firm(s) with counterparty Custodian and Clearing-Financing Banks.
- Your rights, and the promises or guarantees the Clearing Firm pledges to you regarding your Margin Account Securities are explained in the Clearing Firm's disclosure documents which are provided by the Clearing Firm directly to you (the Margin Account Owner). With respect to public exchange-traded and public market-traded financial assets, financial regulators and independent audit firms, via their authorities-of-access to this information, are the examiners of Securities Loan Agreements.
- Clients of RTH who possess Margin Accounts are to understand that no RT Hickman Company is a Clearing, Custodian, or Depository financial firm or institution. RTH is not a "Maker" of Margin Account Contracts. RTH does pursue, and does monitor for Best Execution and Suitability; but RTH is not a Maker or a party to Margin Accounts and Securities Lending Agreements or Arrangements.
- If a RTH Customer/Client opens a Margin Account through a RTH-offered Trading Program (or Asset Management Program or System), both RTH and the applicable Clearing Firm (or Futures Commission Merchant Firm) shall provide detailed Margin Account Disclosure and Educational/Informational documentation. Furthermore, affiliated documentation (such as "Margin Calls" and "The Risks of Using Financial Account Leverage") is also provided.
- **As with any and all investment strategies or methods, Investors are hereby distinctively cautioned to study the Risk Disclosures of Margin Accounts BEFORE using them.**

Form ADV  
Part 2

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SEC File Number: 801-55905  
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(Please distinguish: This is a "Check-The-Box" form version page)  
"Part-II, Page-5"

➤ **Sectional Disclosure Reference Title: Items 11, 13, 16, & 17 – Code Of Ethics, Participation or Interest in Client Transactions & Personal Trading, Review Of Accounts, Investment Discretion, and Voting Client Securities**

---

9. Participation or Interest in Client Transactions.

Applicant or a related person: (check those that apply)

- ☐ A. As principal, buys securities for itself from or sells securities it owns to any client.
- ☒ B. As broker or agent effects securities transactions for compensation for any client.
- ☐ C. As broker or agent for any person other than a client effects transactions in which client securities are sold to or bought from a brokerage customer.
- ☐ D. Recommends to clients that they buy or sell securities or investment products in which the applicant or a related person has some financial interest.
- ☒ E. Buys or sells for itself securities that it also recommends to clients.

(For each box checked, describe on Schedule F when the applicant or a related person engages in these transactions and what restrictions, internal procedures, or disclosures are used for conflicts of interest in those transactions.)

Describe, on Schedule F, your code of ethics, and state that you will provide a copy of your code of ethics to any client or prospective client upon request.

---

10. Conditions for Managing Accounts. Does the applicant provide investment supervisory services, manage investment advisory accounts or hold itself out as providing financial planning or some similarly termed services and impose a minimum dollar value of assets or other conditions for starting or maintaining an account? Yes No  
☒ ☐

(If yes, describe on Schedule F)

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11. Review of Accounts. If applicant provides investment supervisory services, manages investment advisory accounts, or holds itself out as providing financial planning or some similarly termed services:

A. Describe below the reviews and reviewers of the accounts. For reviews, include their frequency, different levels, and triggering factors. For reviewers, include the number of reviewers, their titles and functions, instructions they receive from applicant on performing reviews, and number of accounts assigned each.

REVIEWS:

Clients are structured in professionally managed investment funds and/or accounts. Clients receive monthly or quarterly custodian and/or portfolio statements for their review (see also Page-4, Item-15 "Custody of Client Funds or Securities"). Investments are periodically reviewed with client to determine if positions held are consistent with the investment objectives of the client, and the outlook in relative markets. We are constantly available to our clients. Each client decides when and at what frequency a monitoring, update, and evaluation conference shall be conducted. Clients work with RTH according to terms of RTH Agreement and Disclosure documents (which are the protocol of relationships between RTH and Clients).

CONTINUED ON NEXT PAGE

Form ADV  
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(Please distinguish: This is a "Check-The-Box" form version page)

"Part-II, Page-5" (continued)

➤ **Sectional Disclosure Reference Title: Items 11, 13, 16, & 17 – Code Of Ethics, Participation or Interest in Client Transactions & Personal Trading, Review Of Accounts, Investment Discretion, and Voting Client**

REVIEWERS:

All accounts are reviewed by Robert T. Hickman. Robert T. Hickman is the Firm Principal of RTHRIA, LLC.

B. Describe below the nature and frequency of regular reports to clients on their accounts.

The client receives a confirmation of each transaction from the Custodian and/or Clearing facility for the "Portfolio Maker." Clients are also provided with monthly or quarterly custodian and/or portfolio statements from these third-party service providers. Statements contain the name and amount of each security; current market value of each security, and detail of transactions for month or for quarter. Please understand that third party "Portfolio Makers," with their Valuators and Auditors, determine the reporting-accuracy of Asset Values on Investor Statements. "Unit Investment Securities Providers" report underlying composite valuations in their "Schedules (Lists) of Investments Reports" (which are suppose to be periodically independently audited).

Besides Confirmations and Statements which are provided to each investor and to RTHRIA, LLC from third-party providers, RTHRIA clients may engage R. T. Hickman Financial & Estate Consultants, LLC (RTHFEC) to provide accountings (accounting type of reports) to the Investor/Account Owner. These accountings are not "audits" of reported investment data and as such, they do not verify Valuations. These accountings are usually ordered (requested) by the Investor in order to enhance understanding of the investor's holdings through further report clarity, descriptive presentation, and analyses of results. These accounting reports do not serve to "advise" the investor, nor to "manage" the client's holdings, buys or sells; nor do they provide recommendations. Each client decides when and at what frequency RTHFEC accountings are to be provided. These accountings depict the data of "Portfolio Makers" and/or Custodians. These Third Parties are the originators of reported amounts and financial data. Should a Client ever request Valuation Services from RTH, Client would engage RTHFEC, LLC (refer to the RTH document entitled: "The RTHFC Financial & Estate Consulting Services and Financial Vehicle/Product Implementation Services Engagement Agreement," at Section D – Subsidiary Engagement Agreements). Please note that if RTH provides independent "Valuation Services," RTH may then not be a party-of-access (a Discretionary Trader) to the valued assets since doing both would result in RTH not being independent (it is extremely important for every Investor to understand what this sentence means).

With respect to verification of Account Values, all RTH Clients are provided with two "Self-Review and Preparation Forms," which Clients are requested to prepare and follow to guard their Assets, their asset-values, and to monitor for continued suitability. The titles of these RTH Forms are:

1. "How To Discern If The Account Values Reported To You On Your Investor Statements Appear To Be Correct or Incorrect;" and/or
2. "Client's Self-Checking Diagnostic Analysis of Account(s) Form."

**Item 16 – Investment Discretion:**

RTHRIA, LLC can manage Investments on a Discretionary or Nondiscretionary basis, and, RTH is capable of providing many different kinds of Investment Account Management Services. Currently, the only Discretionary services provided by RTHRIA, LLC are to Clients that qualify-for and have decided to invest in the RTHRIA-Active Positioning Speculative Investing System ("APSIS"). "APSIS" is a securities investment method that is enhanced through Futures and Options-On-Futures broad-based indices contracts techniques. APSIS" applies only to client/customers who qualify for speculative trading methods.

Currently, all other RTH Client/Customer accounts are Nondiscretionary.

Answer all items. Complete amended pages in full. Amended items are listed at page 1A of this Form.

➤ **Sectional Disclosure Reference Title: Items 11, 13, 16, & 17 – Code Of Ethics, Participation or Interest in Client Transactions & Personal Trading, Review Of Accounts, Investment Discretion, and Voting Client**

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RTH Discretionary Authority Power-of-Attorney (POA) documents, generally speaking, grant authority for RTH to manage investment assets in each client's account according to the quantity of funds that the Client/Account Owner decides to place into the account. RTH does not obtain, nor seek to obtain, Power to redeem or to add funds into these accounts. The Client/Account Owner decides additions and redemptions. All redemptions are routed only to the Client/Account Owner. RTH is granted the authority to automatically withdraw RTH fees, which does not commence until the client first reviews RTH's Fee Description & Schedule, via a signed acknowledgment. Client/Account Owners may redeem at any time that a Trading Position is not in progress. RTH does not employ or require "Lock-Up Periods." The client may revoke or terminate at any time. Client-signed documentation is required for all Client-instructed account changes. Also, in RTH POA documents, RTH does not "hold" client assets (assets are "held" within independent qualified Custodian Firms). All Trades and Transactions are processed through independent qualified Clearing Firms. Generally speaking, financial regulators require, and have issued documentary guidance, that before any financial firm utilizes a Custodian or Clearing firm, those firms must be placed through a vetting diagnostic process. What investors need to discern is that in various types of financial products, the responsibility for vetting Custodian and Clearing firms resides-within third-party asset/portfolio managing firms (and/or other similar firms of necessary functional duties). In addition, in RTH's opinion, a Client's desired marketplace (category) of interest, in-and-of-itself must be vetted, with this vetting function occurring through a Client's Suitability Statement. Furthermore, every Investor and Client must understand that in the course of these kinds of vetting diagnostic procedures, various (sometimes many) areas of needed information is insufficient in transparency in order to reach a sufficient-enough conclusion.

When RTH is directly responsible for the selection of (also meaning the utilization of) Clearing or Custodian firms, RTH does formally apply a vetting diagnostic process. RTH does so in-effort to follow the documentary guidance issued by financial regulators. It is to be further distinguished that under US Laws, in conjunction-with and in integration-with financial regulations, the highly important duties of Clearing and Custodianship usually may only be done by qualified financial entities. The investor is to further understand that financial entity "qualification" may be different in each State of our United States, and, also occasionally different within the diverse categories of US financial regulators. RTH has observed that these differences can present a highly-concerning RISK to Investors. To guard Investors, and to attend to this type of RISK, RTH addresses these issues in each Customer Suitability Statement. Albeit, the Investor is to understand that the effectiveness of these careful procedures is limited due to constraints such as insufficient transparency.

The operational specifics of RTH POA documents are contained within each document. RTH POA document details follow design necessities relative to the specific kind and type of Investment Account being placed. Generally speaking, POA accounts usually do feature minimum size requirements, and, addition or redemption size requirements. Also, Clients usually must meet qualifications.

Please also refer to: Page-4, Item-15 "Custody of Client Funds or Securities" in this brochure.

## **Item 17 – Voting Client Securities**

RTH does not vote Client securities. Clients receive proxies or other solicitations directly from the Custodian or Transfer Agent. Accordingly, Clients direct their voting questions directly to the Proxy Materials Issuers and/or Solicitors.

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SEC File Number: 801-55905  
IA's Telephone Number: 1-201-368-3412 Reporting Date of this Form: 3/2009, with 12/2009 revisions  
(Please distinguish: This is a "Check-The-Box" form version page)  
"Part-II, Page-6"

➤ **Sectional Disclosure Reference Title: Items 5, 12, 14, & 18 – Fees and Compensation, Brokerage Practices, Other Compensation, and, Financial Information**

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12. Investment or Brokerage Discretion.

The following authorities apply only when Client formally appoints RTH as a Power Of Attorney for relative investments.

B. Does applicant or any related person have authority to determine, without obtaining specific client consent, the:

	Yes	No
(1) securities to be bought or sold?.....	<u>X</u>	___
(2) amount of the securities to be bought or sold?.....	<u>X</u>	___
(3) broker or dealer to be used?.....	<u>X</u>	___
(4) commission rates paid?.....	<u>X</u>	___

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B. Does applicant or a related person suggest brokers to clients?..... X Yes \_\_\_ No

For each yes answer to A describe on Schedule F any limitations on the authority. For each yes to A(3), A(4) or B, describe on Schedule F the factors considered in selecting brokers and determining the reasonableness of their commissions. If the value of products, research and services given to the applicant or a related person is a factor, describe:

- \* the products, research and services
  - \* whether clients may pay commissions higher than those obtainable from other brokers in return for those products and services
  - \* whether research is used to service all of applicant's accounts or just those accounts paying for it; and
  - \* any procedures the applicant used during the last fiscal year to direct client transactions to a particular broker in return for product and research services received.
- 

13. Additional Compensation.

Does the applicant or a related person have any arrangements, oral or in writing, where it:

A. is paid cash by or receives some economic benefit (including commissions, equipment or non-research services) from a non-client in connection with giving advice to clients?.....	___	<u>X</u>
B. directly or indirectly compensates any person for client referrals?.....	___	<u>X</u>

(For each yes, describe the arrangements on Schedule F.)

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CONTINUED ON NEXT PAGE

➤ **Sectional Disclosure Reference Title: Items 5, 12, 14, & 18 – Fees and Compensation, Brokerage Practices, Other Compensation, and, Financial Information**

14. Balance Sheet. Applicant must provide a balance sheet for the most recent fiscal year on Schedule G if applicant:

- \* has custody of client funds or securities (unless applicant is registered or registering only with the Securities and Exchange Commission); or    No. (not applicable).
- \* requires prepayment of more than \$1200 in fees per client and 6 or more months in advance – No. (N/A)

Has applicant provided a Schedule G balance sheet?.....

Yes

No

—

X

- Balance Sheet is not required.
- RTH does not have Custody of Client Funds.
- See also "Financial Condition" disclosures within Item 1 section.
- RTH does not have any bankruptcy history.

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"Form ADV-II, Part-2, Schedule-F; for answer to: Page-2(A), 1C and 1D"

➤ **Sectional Disclosure Reference Title: Items 4, 5, and 12 – Description of Advisory Business, Fees & Compensation, and, Brokerage Practices**

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The Question states:

"For each type of investment advisory service provided, describe":

- the services provided, including the name of any publication or report issued by the adviser on a subscription basis or for a fee;
- applicant's basic fee schedule, how fees are charged and whether its fees are negotiable;
- when compensation is payable, and if compensation is payable before service is provided, how a client may get a refund or may terminate an investment advisory contract before its expiration date."

When a client or customer wishes to acquire a financial product that is offered through Broker-Dealers, access to these types of products usually requires the Client/Customer to incur a Commission or Basis-Points cost charge (these are called "Cost-Loaded" products). When a Client/Customer instead acquires a "No-Load" product (which means, the product is acquired directly from the product-issuer, and not through a broker dealer firm) the Client/Customer then typically avoids all of (or sometimes most of) a Commission or Basis-Points cost charge. If a Client/Customer selects a "Cost-Loaded" product, and if or when the Client/Customer proceeds to acquire a "Cost-Loaded" product from RT Hickman Securities Brokerage Firm, LLC (RTHSBF,LLC), RTH then receives this compensation. RTH does not require or specifically recommend Clients or Customers to acquire "Cost-Loaded" products (meaning in and of themselves for the purpose of RTH capturing a Commission), nor, to acquire products specifically from RTHSBF,LLC. But if or when a Client/Customer engages RTHRIA,LLC and then also proceeds to acquire a "Cost-Loaded" product from RTHSBF,LLC – this (obviously) presents a situation of Conflicts Of Interests which may not, or may, be acceptable to the Client/Customer (and either way, in every case, proven to be in the best interest of the Client/Customer, based on the Client/Customer's "Suitability Statement Form). Basically, the Conflicts that must be addressed are:

1. If possible, would the Client/Customer prefer to acquire a "No-Load" product; and,
2. If the Client/Customer intentionally desires or must acquire a "Cost-Loaded" product, and does so from RTHSBF,LLC – would the Client/Customer enter a situation of being unfairly cost-charged (such as an unjustifiable or improper "Double-Charge")?

To remove these potentially unfair or detrimental "Conflicts Of Interests" effects from RTH's services with Customer/Clients, RTH formally and procedurally does so through the following RTH advance-disclosure documents (which accompany this brochure) entitled:

- "RTHRIA,LLC Investment Advisory Services Engagement Agreement, With Investment Advisory Services Schedule of Investment Advisory Fees;" and,
- "How Clients Receive Services and Work With The Group of RT Hickman Financial Companies;" and,

CONTINUE ON NEXT PAGE

"Form ADV-II, Part-2, Schedule-F; for answer to: Page-2(A), !C and 1D" (continued)

➤ **Sectional Disclosure Reference Title: Items 4, 5, and 12 – Description of Advisory Business, Fees & Compensation, and, Brokerage Practices**

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- "RTHFC Ethical Policy and Procedure for Avoiding "Double-Charges" To A Customer or Client When Financial Implementations Are Done;" and,
- "The RTHFC Financial & Estate Consulting Services and Financial Vehicle/Product Implementation Services Engagement Agreement."

These formal documents serve to inform, address, and remove any potentially unfair dealings with Client/Customers, while preserving and investor's "Right To Choose Investment and Investment-Provider" (in tact). Every client or customer is required to read these RTH advance-disclosure documents prior to investing.

In addition, issues of Conflicts of Interests are intensively addressed in every client's "Customer Suitability Statement" as executed by Client/Customer and provided to RTH.

**Answer pertaining to RTHRIA-AAM (#1) Wrap Fee Disclosure Brochure (see also Schedule-H data for AAM Program):**

Every client is initially subjected to a fact-finding orientational and basic educational process in order to determine the extent of a client's knowledge of investments as well as to detect client needs. Prior to engagement, this process is effectively communicated to each client, and agreed to by each client through the R. T. HICKMAN, REGISTERED INVESTMENT ADVISER, LLC INVESTMENT ADVISORY SERVICES ENGAGEMENT AGREEMENT document. (This document accompanies this ADV Part 2). Through this process, our clients are assisted in developing a sufficient knowledge of the types of investments in which they desire to invest. Clients are also informed of the various sources and ways to locate and obtain investments from the diverse distribution channels in the U. S. financial marketplace. These educational and consultative methods are provided so that clients may decide which channels they want to take to obtain specific investment types. Where there is a lack of fundamental understanding about certain types of investments, it is explained that they cannot prudently make such investments without first gaining a working knowledge in that area. RTHRIA, LLC does not provide publications or reports on a subscription or fee basis.

Also, prior to placement/implementation, RTH obtains from Client a Form called a "Customer Suitability Statement" (Customer's set of documents to establishment of Account Suitability). This Form serves to have Client self-examine the reasons (the reasonable basis) of why a proposed placement/implementation (with its Prospectus/Disclosure Document) is determined by the Client to be SUITABLE.

Prior to engagement, fees charged for services provided are disclosed to clients through the R. T. HICKMAN REGISTERED INVESTMENT ADVISER, LLC INVESTMENT ADVISORY SERVICES SCHEDULE OF INVESTMENT ADVISORY FEES document. (This document accompanies this ADV Part 2). This SCHEDULE OF INVESTMENT ADVISORY FEES is provided to clients as an attachment to the ENGAGEMENT AGREEMENT document.

**This Part-2, Page-2, ID Answer is CONTINUED ON NEXT PAGE.**



Form ADV  
Part 2

Name of Investment Adviser (the IA): RT Hickman, Registered Investment Adviser, LLC  
SEC File Number: 801-55905  
IA's Telephone Number: 1-201-368-3412 Reporting Date of this Form: 3/2009, with 12/2009 revisions

"Form ADV-II, Part-2, Schedule-F; for answer to: Page-2(A), 1C and 1D" (continued)

**Sectional Disclosure Reference Title: Items 4, 5, and 12 – Description of Advisory Business,  
Fees & Compensation, and, Brokerage Practices**

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When RTHRIA, LLC is compensated on a project basis, the fee is based upon the number of hours involved in such engagements. An engagement inception fee of \$450 may be requested in advance and will be refunded only if an engagement is terminated before work commences. The minimum applicable hourly rate for investment advisory with implementation services will be \$150.00 and any amount due in excess of the stated advance fee will be billed to the client upon each completed stage of each engagement.

RTHRIA, LLC or any client may terminate an investment advisory engagement at any time by providing written notification of this intent to the other party. Clients will be obligated for the fee accrued to the date and time of termination.

In certain circumstances, RTHRIA, LLC will negotiate compensation for services on a fee basis with such fee being a percentage of client assets. The specific percentage rate in such circumstances will be established by mutual agreement with clients.

For further information, refer to this Form ADV, Schedule-H section entitled "Wrap Fee Disclosure Brochure," for RTHRIA-AAM (#1).

With respect to "APSIS," (refer to Item 4) RTHRIA presents a "Wrap Fee Disclosure." However, specific implementation as prescribed by each APSIS Client is located within each Client's "Customer Suitability Statement" and "APSIS Agreement."

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Form ADV  
Part 2

Name of Investment Adviser (the IA): RT Hickman, Registered Investment Adviser, LLC  
SEC File Number: 801-55905  
IA's Telephone Number: 1-201-368-3412 Reporting Date of this Form: 3/2009, with 12/2009 revisions

"Form ADV-II, Part-2, Schedule-F; for answer to: Page-2(A), 1C and 1D" (continued)

➤ **Sectional Disclosure Reference Title: Item 6 – Performance Fees and Side-By-Side Management**

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Currently, the only Investment Placement (type of Investment Placement) in which RTH Clients are subjected to "Performance Fees" is in "APSIS" (refer to Item 4). For specific information, each APSIS Client refers to their "Customer Suitability Statement," and, "APSIS Agreement."

RTH does not offer Investment Services in two or more differently priced versions for the same service. (RTH does not offer "Side-By-Side" service arrangements).

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"Form ADV-II, Part-2, Schedule-F; for answer to: Page-4, # 5"

➤ **Sectional Disclosure Reference Title: Items 9 & 10 – Education Standards, Disciplinary Information, and, Financial Industry Activities and Affiliations**

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The Question States:

"Are there any general standards of education or business experience that applicant requires of those involved in determining or giving investment advice to clients?"

Answer:

Education and Business Practice Standard: A formal financial (or specialty) degree, in conjunction with a formal financial practitioner's designation, and experience.

"Form ADV-II, Part-2, Schedule-F; for answer to: Page-4, #6"

**Robert T. Hickman's FINANCIAL INDUSTRY DISCIPLINARY HISTORY:**

None. / No reportable issues.

**Supervision of Robert T. Hickman and the RTHFC Professional Financial Practices:**

Robert T. Hickman is sole Firm Principal and Compliance Officer. Robert T. Hickman and the RTHFC are cyclically and/or periodically directly subjected to on-site Examinations by financial regulators (FINRA, SEC, NFA, & CFTC, etc.). Robert T. Hickman and the RTHFC maintain records of regulatory examination findings, examination outcomes, deficiencies or violations noted, and deficiencies or violations resolved.

Robert T. Hickman and the RTHFC have been registered and directly subjected to financial regulations and on-site examinations since inception.

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"Form ADV-II, Part-2, Schedule-F; for answer to: Page-4, #7 & #8"

➤ **Sectional Disclosure Reference Title: Items 9 & 10 – Educational, and, Financial Industry Activities and Affiliations**

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**LIST OF PROFESSIONAL CREDENTIALS & DESIGNATIONS: PERSONAL PROFESSIONAL CREDENTIALS & DESIGNATIONS OF THE R. T. HICKMAN FINANCIAL FIRMS, AND OF ROBERT T. HICKMAN:**

- Commodity Trading Advisor, (here meaning – via the Series-3 individual (personally-attained) proficiency credential)  
National Futures Association (Commodity Futures Trading Commission)  
Firm Principal and Associated Person.....(2006)
- General Securities Principal (Firm Principal)  
National Association of Securities Dealers, Series 24.....(1999)  
General Securities Representative  
National Association of Securities Dealers, Series 7.....(1990)  
National Association of Securities Dealers, Series 63.....(1990)
- Licensed Producer of Life & Health Insurance  
State of New Jersey, Dept. of Insurance .....(1990)  
State of New York, Dept. of Insurance.....(1991)  
State of Pennsylvania, Dept of Insurance.....(1997)  
State of Connecticut, Dept. of Insurance.....(1997)
- Certified Financial Planner  
Certified Financial Planner Board of Standards.....(1991)
- Certified Public Accountant  
State of New Jersey, Board of Accountancy.....(1984)
- NJSCPA Fellow, New Jersey Society of CPAs.....(1984)
- NJSCPA Personal Financial Planning Committee, Committee Member..... (1991- 1996)
- NYSCPA Member, New York Society of CPAs.....(1993)
- NYSCPA Personal Financial Planning Committee Member..... (1993 – 1996)
- American Institute of CPAs Member.. .....(1985 - 2009)
- American Institute of CPAs, with former Membership in the  
AICPA Personal Financial Planning Division.....(1985 – 2004)
- Estate Planning Council of Bergen County Council Member.....(1985 – 1996)
- New York University Advanced Estate Planning Study Group Member (New York City).....(1995 – 1998)
- International Foundation of Employee Benefit Plans Member.....(1997 – 2009)
- Association of Life Underwriters (New York City) Member.....(1997 – 2001)
- The Greater Essex Association of Insurance and Financial Advisors (Newark, NJ) Member .....(2001)
- The Society of Insurance Research Member.....(2001 – 2005)
- Investment Management Consultants Association Member.....(2002 – 2005)

END OF LIST

"Form ADV-II, Part-2, Schedule-F; for answer to: Page-4, #8C1, #8C4, & #8C9"

➤ **Sectional Disclosure Reference Title: Items 12 & 14 – Brokerage Practices, and Other Additional Compensation**

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The Question States:

"What arrangements and/or affiliations does RTHRIA, LLC have with related entities and/or persons that are material to the advisory business of RTHRIA, LLC with its clients?"

Answer:

Robert T. Hickman is a Registered Representative and the Firm Principal of R. T. HICKMAN SECURITIES BROKERAGE FIRM, LLC (RTHSBF), a separate company. RTHSBF is the Brokerage firm through which R. T. Hickman executes brokerage-based investment implementation transactions on behalf of clients. (Please also refer to Schedule F, Part 2, Page 6, # 12B). Should clients elect to use RTHSBF to execute buy and sell transactions, Robert T. Hickman will receive a portion of commissions on such transactions. Currently, accounts placed through RTHSBF are usually "Unit Investment Securities" (UIS) types of accounts, and as such, are accounts of assets held directly within the Prospectus-referenced Clearing and Custodian firms as relative to each kind of UIS product. (Please note: this comprises multiple lists of various entities, each of which have been advance-filed to each respective financial regulator by each Product Maker-Issuer).

For securities which are required to be specifically positioned by RTH within institutional Clearing and Custodianship, R. T. Hickman, Registered Investment Adviser, LLC currently utilizes, on a non-exclusive basis, the Custodian (Holding) and Clearing firms of TD Ameritrade, and Interactive Brokers Group. Please further distinguish that RTH will work with any qualified and vetted Custodian or Clearing firm that a Client may specifically want, if and when a sufficient amount of assets are proposed by Client to make such a configuration plausible, as relative to each Client proposed situation.

Over the time period of 1/92-11/99, R. T. Hickman utilized Polaris Financial Services for brokerage resources with RTH as a Registered Representative via an Independent Contractor Agreement. Polaris was an Introducing Firm to Pershing/Donaldson, Lufkin, Jenrette.

Some of the material factors that RTH considers in selecting or recommending Broker-Dealers other than RTHSBF (i.e.-Clearing Firms, as well as Product-Maker/Issuer Firms), or Custodian Entities for Client needs are:

1. Solvency, security, and continuity capacity;
2. Willingness of Transparency (meaning proper, non-exploitative Transparency);
3. Best qualitative executions or provisions as relative to the type of required investment;
4. Functional suitability and reliability: the Entity's ability to properly accommodate Client(s) needs;
5. Technological methods and technological suitability;

"Form ADV-II, Part-2, Schedule-F; for answer to: Page-4, #8C1, #8C4, & #8C9" (continued)

➤ **Sectional Disclosure Reference Title: Items 12 & 14 – Brokerage Practices, and Other Additional Compensation**

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6. The preferences and desires of Client(s), in balance with Entity's quality of response and receptivity to RTH's (and Client's) vetting attempts (the Entity's willingness to be cooperative with RTH and Client proper requests, and how issues are handled, including the Entity's staff conduct encountered). Departures from properly-applied rationality are viewed by RTH as a Red Flag;
7. A demonstrated respect-for and committed vigilance-to Fiduciary Principles;
8. Fairness of dealings, and competitiveness of Price. (Please note: RTH examines to see if size of price would be materially detrimental to the relative Investment);
9. Conflicts of Interests and Disciplinary/Legal histories (standing with regulators, responsible attendance thereto, and devotion to effective/proper resolution);
10. Vigilance and devotion in maintenance of Investor's Rights;
11. Whether or not the different departments of an Entity act concertedly in the best interest of the Investor, or otherwise, if Conflicts of Interests are detected.

Mutual Funds, Variable Annuities, and Variable Life Insurance (Unit Investment Securities):

These investment vehicles, when distributed through broker-dealer firms, typically feature and pay a .15 - .75 basis point (bp) compensation trail. If/when a client implements these investment vehicles through RTHSB, RTHSB accepts and utilizes the bp compensation trail for maintaining and holding these accounts according to regulations within and as a Brokerage Firm Account. For purposes of these requirements, "maintenance" and "holding" consists of preserving file data according to numerous financial regulations such as securities regulations, privacy regulations, anti money laundering (financial crimes monitoring), etc., and, monitoring for continued suitability. It is to be noted and understood that Maintenance and Holding does not comprise Investment Advice and/or Investment Management. Investment Advice and/or Investment Management activities for all R. T. Hickman clientele is provided via R. T. Hickman, Registered Investment Adviser, LLC. For further information, refer to this Form ADV, Schedule-H section entitled "Wrap Fee Disclosure Brochure."

When R. T. Hickman enters into an Investment Advisory Fee Arrangement with a client, compensation for services is then based on mutual agreements with client(s). For a thorough understanding of this arrangement, please refer to the R. T. HICKMAN REGISTERED INVESTMENT ADVISER, LLC INVESTMENT ADVISORY SERVICES SCHEDULE OF INVESTMENT ADVISORY FEES document. (This document accompanies this ADV Part 2.). Please also refer to the areas within Schedule-H data which describe Fees and how Fees are charged.

To understand how RTH removes potentially unfair or detrimental "Conflicts of Interests" when a Client uses RTHSBF for Brokerage Practices, please refer to this brochure's page-section Schedule-F, for answer to Page 2(A), #1C and #D.

"Form ADV-II, Part-2, Schedule-F; for answer to: Page-4, #8C1, #8C4, & #8C9" (continued)

➤ **Sectional Disclosure Reference Title: Items 12 & 14 – Brokerage Practices, and Other Additional Compensation**

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Through R. T. Hickman, Licensed Insurance Producer, LLC (a separate company), Robert T. Hickman maintains Broker/Agent relationships with various life and/or health insurance companies that are specialists in specific non-variable insurance product-types. RTHLIP,LLC implements insurance transactions through Insurance Companies on behalf of RTH clients. In these engagements, RTHLIP,LLC may receive an insurance sales commission from insurers whenever a client purchases insurance through the Agent or Broker arrangements of RTHLIP, LLC.

Through R. T. Hickman Financial & Estate Consultants, LLC (a separate company) financial consulting services for Businesses, Individuals, Trusts, Estates, and Employee Benefit Plans are provided. These services are usually accomplished on a Project-By-Project basis, with fee compensation mutually-agreed with clients. These engagements usually commence from financial-consultative needs discovered from new client profiles, and typically become additionally necessary when profile data significantly changes over time. RTHFEC,LLC also provides accounting type of reports for RTHRIA,LLC investor-clients. This service explained at Part 2, Page 5, 11B.

Benefits that RTH receives from third party unrelated and nonaffiliated Broker-Dealer firms, or any other third-party firms:

-NONE. Stated more specifically:

RTH does not receive, nor seek to receive research or any other products or services from third parties.

RTH does not accept, nor seek to arrange higher (than market norms) Commissions (or Markups or Markdowns) in return for benefits (a/k/a "soft dollar benefits").

RTH does not receive referrals from any third party broker-dealers or third party firms. RTH does not enter into these incentive arrangements.

RTH does not receive, nor seek to receive prizes or awards.

RTH does not pay others for Clients referred to RTH.

De Minimis exception: Generally speaking, financial regulations permit gifts (such as during holidays) of up to \$50 per year. RTH shall accept a De Minimis gift since the values are small enough to not effect any Conflicts of Interests. Also, if RTH is invited to an educational seminar (not meaning a vacation getaway), RTH may attend. Education is a necessary part of service to Clients (not a Conflict of Interests).

Form ADV  
Part 2

Name of Investment Adviser (the IA): RT Hickman, Registered Investment Adviser, LLC  
SEC File Number: 801-55905  
IA's Telephone Number: 1-201-368-3412 Reporting Date of this Form: 3/2009, with 12/2009 revisions

"Form ADV-II, Part-2, Schedule-F; for answer to: Page-5, #9B"

➤ **Sectional Disclosure Reference Title: Item 12 – Brokerage Practices**

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The Question States:

"Does RTHRIA, LLC or a Related Person (under common control) as a Broker/Agent, effect securities transactions for compensation for any client?"

Answer:

RTHSBF, LLC effects securities transactions for compensation for RTHRIA, LLC clients. This relationship is explained at Schedule F, at Part 2, Page 4, Item 8. It is not mandatory for clients to use RTHSBF, LLC. Clients decide (elect) whether or not to use RTHSB, LLC. Pricing is standardized for all FINRA/NASD Member Firms via Prospectus disclosure and offering rules in placements of Unit Investment Securities types of products. Currently, RTHSBF,LLC is not authorized to provide Clearing and/or Custodian services.

PLEASE NOTE: During the year-2007, the National Association of Securities Dealers "NASD" reorganized and adopted a new name: Financial Industry Regulatory Authority "FINRA." Accordingly, "NASD" is now to be known as "FINRA".

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"Form ADV-II, Part-2, Schedule-F; for answer to: Page-5, #9E"

➤ **Sectional Disclosure Reference Title: Items 11 & 12 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading, and, Brokerage Practices**

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The Question States:

"Does RTHRIA, LLC or a Related Person (under common control), buy or sell securities that it also recommends to clients?"

Answer:

In Mutual Funds (Unit Investment types of Securities), and, in "APSYS" (refer to Item 4) – YES.

RTHRIA, LLC's procedures and restrictions which alleviate potential conflicts of interest and maintain achievement of fiduciary responsibilities are disclosed at the Personal Securities Transactions procedures which are explained in this Form ADV's Schedule-H section entitled "Wrap Fee Disclosure Brochure." Please be in understanding that there are times when it is in the Client's best interest for RTH to invest in the same securities of Client. When done, Client interests are treated first, paramount to RTH interests. Over time, RTH has found that owning the identical securities that Clients are invested-in does serve to create greater transparencies in quest of achieving the Client's best interest.

Please also refer to accompanying RTH disclosure document entitled:

"RTH Procedures and Ethics Policy for Resolving Incorrect Personal or Proprietary Account Securities Transactions, and for Theft or Misplacements Which Cause Diminishment To Client Accounts"

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Form ADV  
Part 2

Name of Investment Adviser (the IA): RT Hickman, Registered Investment Adviser, LLC  
SEC File Number: 801-55905  
IA's Telephone Number: 1-201-368-3412 Reporting Date of this Form: 3/2009, with 12/2009 revisions

"Form ADV-II, Part-2, Schedule-F; for answer to: Page-5, #10"

➤ **Special Disclosure Reference Title: Items 11 & 13 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading, and, Review Of Accounts**

---

The Question States:

"Does the applicant provide investment supervisory services, manage investment advisory accounts or hold itself out as providing financial planning or some similarly termed services and impose a minimum dollar value of assets or other conditions for starting or maintaining an account?"

Answer:

Account minimum balances are as defined in the Prospectus of whichever Investment Fund (or vehicle) a client has selected to invest in. R. T. Hickman currently does not require a specified minimum dollar requirement. Clients are requested to agree to the RTHRIA, LLC SCHEDULE OF INVESTMENT ADVISORY FEES document. "APSIS" (see Item 4) has its own Fee Schedule and Schedule-H Fee Disclosure design. In these Brochures, Clients are to discern that some investment methods, or investment implementations, are suitable (for the Client, as well as for an enacted R. T. Hickman undertaking) only with an adequate amount of placed dollars, with all factors or conditions being considered. Accordingly, a Mutual Fund (for example) may offer a small-size minimum, however, R. T. Hickman likely would require a significantly higher amount in reason of various feasibility factors as necessarily relative to the particular Investor-Client proposal. Establishing a Client relationship with R. T. Hickman usually requires an appropriate quantity of placed dollars.

Please also refer to this brochure pages at Part-2, pages 2 and 3.

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"Form ADV-II, Part-2, Schedule-F; for answer to: Page-5, #9 FOOTNOTE"

➤ **Special Disclosure Reference Title: Items 11 & 13 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading, and, Review Of Accounts**

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RTHFC Outline of all Categories and Disclosure Documents Which Describe  
RTHFC Ethical Procedures (CODE OF ETHICS)

I) Overall Financial Undertakings & Consultations Ethics

- RTHFC Master Services Engagement Agreement Document and affiliated referenced documents (provided to all Clients);
- RTHFC Implementation Methodology & How Compensation is Structured
- Specific instructional Disclosure Documents about Costs, which are provided to attend to the responsibility of how costs clearly communicated, in advance, to clients PRIOR TO Implementations (provided to all Clients);

II) Ethics pertaining to Investment Adviser Activities & Securities Implementation

(provided to all Investment Clients) Please note: The Code of Ethics that RTHRIA ascribes to as an SEC-registered Adviser may be studies at [www.sec.gov/rules/final/ia-2256.htm](http://www.sec.gov/rules/final/ia-2256.htm). Therein, scroll to mid-section of documentation to "275-204A-1 Investment Adviser Codes of Ethics."

III) Ethics pertaining to Insurance Consultation Activities & Insurance Implementation  
(provided to all Insurance Clients);

IV) Ethics pertaining to Financial Product Makers and Financial Product Providers,  
including their Auditors (internal Codes of Procedure).

V) RTH Code of Ethical Procedure RE: Investment Advice and Safeguarding Against Potential Conflicts Of Interest As Possibly Caused By  
Personal Trading Activities Of Investment Advisers (internal Code of Procedure).

The method of communication and provision of RTHFC Codes or Policies of Ethics is to provide Ethics disclosures before starting work with a Client:

1. On a modular basis (which means that Ethics disclosures will be provided sectionally, according to the type of financial work that Client chooses to do with RTHFC. If work engagements are broad in nature (based on what client requests), ALL RTHFC Ethical disclosures may then be provided;
2. To provide them in writing; and
3. To provide Disclosure to Client(s) via a proof-of-delivery method, which serves as Confirmation that:
  - A) The Client has reviewed the Terms of the applicable RTHFC-required ethical procedure and pledges to work with RTHFC according to these procedures;
  - B) Proof-Of-Delivery DISCLOSURE creates a mutual record, and a mutual understanding of how RTHFC and the Client pledge to work with each other, which is necessary due to the complexities, importance, and necessary ongoing positive good-faith synergy, to ascertain we shall work in a best-effort to avoid misunderstandings and potentially misleading scenarios, to avoid circumstances where what is wanted or needed is beyond rational possibility, to work together in a way where ongoing monitoring is truly achieved, but with the Client knowing that if the Client chooses to neglect monitoring, the Client does so at their own risk.

NOTE: RTH does not utilize "Lock-Up Periods." Client may conclude engagement at any time.

PROVISION OF COPY:

Various subject-focused areas of RTH's Form ADV Part-2 and RTH Advance Disclosure Brochure data contain descriptions of RTH ethical procedures. RTH also maintains an expansive "Comprehensive Code of Ethics" for Investment and Insurance activities. If a Client wishes to receive a copy of the RTH Comprehensive Code of Ethics, Client is to send a dated and signed written request to RT Hickman.

Form ADV  
Part 2

Name of Investment Adviser (the IA): RT Hickman, Registered Investment Adviser, LLC  
SEC File Number: 801-55905  
IA's Telephone Number: 1-201-368-3412 Reporting Date of this Form: 3/2009, with 12/2009 revisions

"Form ADV-II, Part-2, Schedule-F; for answer to: Page-6, #12B"

➤ **Sectional Disclosure Reference Title: Item 12 – Brokerage Practices**

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The Question States:

"Does RTHRIA, LLC suggest brokers to clients?"

Answer:

Since Robert T. Hickman is a registered Firm Principal and representative of R. T. Hickman Securities Brokerage Firm, LLC (RTHSBF), RTHSBF will be suggested to the client for brokerage investment decisions and implementations due to this firm's brokerage experience, quality of service, and support capabilities which the client could work well with. RTHSBF is not a Clearing or Custodian Firm. RTHSBF is an Apps-Way Firm (a B/D Firm authorized to receive and process investment applications, which in all cases are then forwarded to Issuer, Clearing, and Custodian Firms). Commissions are structured according to Product-Maker/Issuer Prospectus disclosures. Pricing for placements made by RTHSBF is standardized according to financial regulations (since these placements are retail products, such as in Unit Investment Securities, Annuities, etc). Products of standardized pricing do not consist of price Conflicts of Interest. The pricing structure of these types of products are advance-filed (by the Product-Maker/Issuers) to financial regulators, with pricings designed according to regulatory standardized pricing frameworks. Clients evaluate pricing relative to all services provided, and ultimately select Robert T. Hickman and RTHSBF on this basis. In all investment placements, RTH seeks relative Best Execution. Any price-discounts by purchase aggregations are defined and instructed in each Prospectus. RTH procedurally does analyze Prospectus-defined Sales Charge Reduction and Waiver opportunities with Customer/Clients, with each analysis documented with Customer/Client pursuant to RTH Customer Suitability procedures. Apps-Way financial products in-and-of-themselves (meaning at the internal Portfolio/Fund Manager level) attend to Best Execution Aggregation Discounts (discounted transaction costs by bunching securities purchases), and accordingly, this Best Execution pursuit is not applicable at the retail level. See also Schedule F, Part 2, Page 4, Item 8; and, Schedule F, Part 2, Page 5, Item 9B.

RTHSBF, LLC is a Member of FINRA/NASD and SIPC. Accordingly, Investor is to additionally refer to: [www.finra.org](http://www.finra.org), and to: [www.sipc.org](http://www.sipc.org). SIPC (the Securities Investor Protection Corporation) may also be reached at telephone number: (202) 371-8300.

PLEASE NOTE: During the year-2007, the National Association of Securities Dealers "NASD" reorganized and adopted a new name: Financial Industry Regulatory Authority "FINRA." Accordingly, "NASD" is now to be known as "FINRA".

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Name of Investment Adviser (the IA): RT Hickman, Registered Investment Adviser, LLC  
SEC File Number: 801-55905  
IA's Telephone Number: 1-201-368-3412 Reporting Date of this Form: 3/2009, with 12/2009 revisions

"Form ADV-II, Part-2, Schedule-F; Additional Important Form ADV Disclosures"  
(Supplemental "Disclosure-Types" or "Brochure-Types" of Information)

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### **ADDITIONAL IMPORTANT FORM ADV DISCLOSURES:**

- The RTHFC adhere to Data Privacy Protection Rules. Refer to RTHFC's Notice of Privacy Policy Kit ( a separate RTHFC Disclosure document).

- The RTHFC have procedures in place and proactively comply with Financial Crimes Enforcement Regulations, processes, and procedures.

**Important NOTICE TO CLIENT about procedures for opening any new accounts with any of the R.T.. Hickman Financial Companies: To help the government fight the funding of terrorism and money laundering activities, Federal law requires all financial institutions to obtain, verify, and record information that identifies each person who opens an account.**

**What this means for you: When you open an account, we will ask for your name, address, date of birth, and other information that will allow us to identify you. We may also ask to see your driver's license or other identifying documents.**

- Proxy Voting of Accounts: Client shall maintain all proxy voting. Adviser will not vote proxies under any circumstances. (This includes any type of Shareholder Election response Form).

- Code of Ethics: RTHFC conduct business practices according to Codes Of Ethics, which are outlines in this Form ADV at the section entitled: RTHFC Outline of all Categories and Disclosure Documents Which Describe RTHFC Ethical Procedures. Please refer to that section.

- Further in ethical procedures, refer to the accompanying RTH informational document entitled:

**"RTH Procedures and Ethics Policy for Resolving Incorrect Personal or Proprietary Account Securities Transactions, and for Theft or Misplacements which cause Diminishment to Client Account(s)."**

- RTHFC has, in force, a Business Continuity Plan. The Summary Disclosure Statement to the RTHFC Business Continuity Plan is presented in this Form ADV, in its own section. Please refer to that section.

- Other important Documents which are to be referenced along-with this Form ADV:

- The RTHFC "Services Engagement Agreement;" and all affiliated documents; and

- "How Clients Receive Services and Work With the Group of R.T. Hickman Financial Companies," and all affiliated documents.

### **FOCUS ALERT: Prospectuses which require "Special Treatments" or "Special Conditions" to filling (processing) requested Transaction Orders:**

Prospectus requirements of Funds and Variable Contracts(VC) have evolved into complicated and sometimes non-uniform requirements. It is not uncommon for a Transaction Order to NOT be processed, or delayed, because of filtering criteria requirements. At RTHFC, if we place an order for you to Funds or to VCs, we request the Day Close price for your request. However, if the Order Processor delays or fails, we do not assume responsibility because we cannot control what Processors at your Fund or VC do, or will not do, and we do not (and cannot) control their computer systems.

Form ADV                      Name of Investment Adviser (the IA): RT Hickman, Registered Investment Adviser, LLC  
Part 2                        SEC File Number:                      801-55905  
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"Form ADV-II, Part-2, Schedule-F; Additional Important Form ADV Disclosures" (continued)  
(Supplemental "Disclosure-Types" or "Brochure-Types" of Information)

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**ADDITIONAL IMPORTANT FORM ADV DISCLOSURES (continued):**

Financial regulations now require your cooperation in timely informing us of changes in your profile of data which could effect our services to you. In writing, you are required to timely inform us of changes or inaccuracies in your name, address, telephone number, tax identification number, etc., personal and/or business affiliations, professional relationships, and possible business or personal relationship conflicts of interest.

For categorically monitoring and reporting changes in your data, please refer to the following RTHFC FORMS which you may conveniently use to report changes or new information to RTHFC (including if you change the purpose or objective of any of your financial accounts):

- **Client's Request Order To Change Purpose and Objective of Existing Financial Account;**
- **Client's Request Order To Change Name, &/or Address, &/or Telecom (Contact) Numbers of Financial Account;**
- **Client's Request To Establish or Change Client's Bank Wire Routing Venue or other Bank Transmittal-Link for Financial Account;**
- **Client's Data Privacy Request Order (Opt-Out of Disclosure Order) for Financial Account;**
- **List of Client's Financial Internet Accounts, &/or List of Client's Other (Third Party) "Trusted Persons" (as relative to Client's account).**

Client is to also understand that whenever Client wishes to comprehensively change or update their profile data at RTHFC, or update profile data for categories other than in the above list of Forms, Client is instructed to do so on RTH Form entitled:

**"Customer (Client) Account RECORD Form &  
Customer Agreement of Customer Account Information."**

As we keep each other current, we ascertain that our engagement work matters are accurate, timely and suitable.

**IMPORTANT RTH DOCUMENT PROVISION, ORDERS,  
AND DELIVERY PROCEDURAL REQUIREMENTS:**

RTH requires all Clients to agree that anyone who accepts delivery on Client's behalf at Client's specified address of record (without, or with receiver's signature when applicable), serves with the same effect as if Client (the Investor-Owner) personally received delivery. This is also required policy for RTH-provided audio messages. Client is required to further agree to hold RTH harmless from any potential detrimental effects that could result from Client's third party receiver (personal or electronic) failing to provide delivery personally to Client upon arrival at Client's address of record.

Form ADV                      Name of Investment Adviser (the IA): RT Hickman, Registered Investment Adviser, LLC  
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"Form ADV-II, Part-2, Schedule-F; Additional Important Form ADV Disclosures" (continued)  
(Supplemental "Disclosure-Types" or "Brochure-Types" of Information)

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**ADDITIONAL IMPORTANT FORM ADV DISCLOSURES (continued):**

**Other important Monitoring or Data-Collection RTH Forms which RTH strongly advises Client to prepare and process (copies accompany this ADV Form):**

- RTH instruction letter to Investor Client entitled:

"How To Discern If The Account Values Reported To You On Your Investor Statements Appear To Be Correct or Incorrect,"  
...with this letter's accompanying "fill-it-in-yourself: Form entitled:  
"Client's Self-Checking Diagnostic Analysis of Account(s) Form."

- RTH's FORM LETTER (from Client-Investor to RTH) on which Client instructs: ...In the event Client becomes unlocatable, disabled, or meets demise, RTH is instructed to contact Client's "Appointed Person" with name of \_\_\_\_\_ for disposition of account instructions.

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Form ADV  
Part 2

Name of Investment Adviser (the IA): RT Hickman, Registered Investment Adviser, LLC  
SEC File Number: 801-55905  
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**"Form ADV-II, Part-2, Schedule-F; Business Continuity Plan, Summary Disclosure Statement"**  
**(Supplemental "Disclosure-Types" or "Brochure-Types" of Information)**

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R.T. Hickman Financial Companies

**BUSINESS CONTINUITY PLAN**

**SUMMARY DISCLOSURE STATEMENT**

In the event of a Significant Business Disruption (a SBD) which could occur from the cause of various types of scenarios, each of which could vary in severity (such as a firm-only business disruption, a disruption to a single building/operations facility, disruption to a business district, a city-wide business disruption, or a regional disruption), the RTHFC do plan to continue business during such potential scenarios. Our Plan would be to resume communicational activities within a few days. Activation of Back Up Facility operations, according to our Plan, would be to resume functional/operational activities in approximately 30 days. Our plan for immediate Back Up attendance to our Clients (which we hereby request our Clients to remember) is that in every Client account, we have designed each account and Client with the ability to directly call the Service Department at the financial institution(s) where your assets are held. All Client accounts provide the Client to self-direct their assets at any time. Accordingly, if RTHFC ever encounters a Significant Business Disruption, at any moment the Client may personally Order their account to be moved to a safe (Cash or Money Market) type of position, which a Client might want to do until the disruption circumstances are brought back under control. In the event of Death or Significant Disability of Robert T. Hickman, a Succession Team procedure would go into operation. This Team's procedures and powers do not supersede the Client's right to self-direct their accounts at any time. The Succession Team would follow our Resumption of Activities Plan, however, attendance to Clients by a replacement professional would probably require approximately 30 days of transition time (time delay), rather than within a few days. Last, the reader is to acknowledge that in the event of an enormous size disruption, RTHFC would strive to resume operational activity; however, in the event of an enormous disruption, resumption of operational activities could take longer (conditions permitting). The BCP of R.T. Hickman has been formally filed to requesting Regulators.

**BCP PROCEDURES WITH RESPECT TO CLIENT's ACCOUNT(s):**

When in the event that Client cannot be located, or Client encounters a state of disabled cognition, or meets his/her demise; RTH utilizes a standing Client Letter Of Instruction to RTH wherein instruction is provided by Client for the disposition of Client's account(s). Client provides an Entrusted Person to direct matters forwardly on behalf of Client in these BCP circumstances. The objective is for Client to establish his/her own personal (individual) BCP directives.

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"Form ADV-II, Part-2, Schedule-F; Additional Disclosure Documents Relative To Form ADV"  
(Supplemental "Disclosure-Types" or "Brochure-Types" of Information)

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### **ADDITIONAL DISCLOSURE DOCUMENTS RELATIVE TO FORM ADV:**

**The following supplemental Disclosure Documents are provided to Customer/Client as relative to the kinds of services that Client engages or enacts RT Hickman to do. Most, and sometimes all of these Disclosures are provided to Client. All of these Disclosure Documents are filed to State Securities/Investment Adviser Departments. Some of these Disclosure Documents may be considered "Practitioner Proprietary."**

- RT Hickman, Registered Investment Adviser, LLC's (RTHRIA, LLC's) Cover Page (title page) to Form ADV Filing;
- RTHRIA, LLC's Cover Letter (instruction letter to Client RE: Form ADV);
- [www.sec.gov](http://www.sec.gov)'s "Form ADV" instruction page and "Protect Your Money: Check Out Brokers and Advisers" information page (with picture of where to enter into FINRA's "Investor Information" web site section. Note: NASD is now FINRA);
- RTHRIA, LLC's National Futures Association (NFA) "BASIC" web-search Details Page;
- NFA's Background Affiliation Status Information Center (BASIC) Information Booklet Resource pages;
- RTHRIA, LLC's Form ADV, Schedule-H: Wrap Fee Program Description for the "RTHRIA-AAM#1" Investment Advisory Services arrangement (for Clients that want to engage RTHRIA for services on a "Wrap Fee" basis). "APSI" (see Item 4) has its own Fee Schedule and Schedule-H Fee Disclosure design;
- RTHRIA, LLC's Investment Advisory Services Engagement Agreement (for Nondiscretionary, Client-Directed arrangements);
- RT Hickman Financial Companies, LLC (RTHFC) "Financial & Estate Consulting Services and Financial Vehicle/Product Implementation Services Engagement Agreement" disclosure document;
- RT Hickman Financial Companies instructional document: "How Clients Receive Services and Work With the Group of RT Hickman Financial Companies;"
- List of Client's disclosed (reported) "Trusted Persons" and "Financial Internet Accounts" (meaning, other than with RT Hickman);
- RTHRIA, LLC's account establishment document: "Customer (Client) Account RECORD Form & Customer Agreement of Customer Account Information;"
- RT Hickman Securities Brokerage Firm, LLC (RTHSBF, LLC) account establishment document: "Customer (Client) Account RECORD Form & Customer Agreement of Customer Account Information;"
- RTHFC privacy policy disclosure document entitled: "Notice of Privacy Policy Kit;"

CONTINUED ON NEXT PAGE

Form ADV  
Part 2

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"Form ADV-II, Part-2, Schedule-F; Additional Disclosure Documents Relative To Form ADV" (continued)  
(Supplemental "Disclosure-Types" or "Brochure-Types" of Information)

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**ADDITIONAL DISCLOSURE DOCUMENTS RELATIVE TO FORM ADV:  
(continued)**

- RTHFC's informational document: Customer's Advance Study (advance disclosure) of the Three-Party (triangular) Method that RT Hickman applies to Customer's Account for the Formation and Maintenance of a SUITABLE Account for Customer/Client;
- RTHFC's "Practice Policy Disclosure on CONFLICTS OF INTERESTS;
- RTHFC's "Known and Probable Conflicts Of Interest That You (Client) Shall Encounter As You Work With RTHFC;"
- RTHFC's "Special/High-Concern Conflicts Of Interest Pertaining To Investments and How RT Hickman Provides Ethical Conduct and Management In These Conflicting Circumstances;"
- RTHRIA,LLC's "Prospectus Receipt Form" (Client's acknowledgement of elements within each Prospectus selected by Client);
- RTHSBF,LLC's "Prospectus Receipt Form," including FINRA's "Breakpoint Checklist," and "Breakpoint Worksheet;"
- RTHFC/RTHRIA/RTHSBF,LLCs "Customer Suitability Statement" (Customer's set of documents to establishment of Account Suitability);
- RTHRIA/RTHFC's instruction letter to Client: "Check-Up Of Your Identification Data, Client RECORD Data, Suitability, & Operation Of Your Account(s);"
- Our USA's Patriot Act "Notification and Customer Identification Verification" form;
- RTHSBF,LLC's Audited Statement of Financial Condition, with Independent Auditor's Report;
- RTHRIA,LLC's "APSIS" Client-prescribed "Customer Suitability Statement," and, "APSIS" Investment Management Agreement;"
- RTH Ethical Policy and Procedure for Avoiding "Double Charges" to a Client/Customer;
- How Financial Regulatory Frameworks (the rules of financial regulations) Apply to the RTHFC; and, How The RTHFC Operate According To Financial Regulations.

END OF LIST