



**RETIREMENT CORPORATION
OF AMERICA**

**SEC File Number: 801 – 26109
Firm Brochure
Dated January 25, 2012**

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This brochure provides information about the qualifications and business practices of The Retirement Corporation of America ("RCA"). If you have any questions about the contents of this brochure, please contact us by telephone at: (513) 769-4040 or by email at: dan.kiley@rca-online.com.

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority. RCA's registration as an Investment Adviser does not imply a certain level of skill or training.

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

Material Changes

Annual Update

The Firm Brochure will be updated annually when material changes occur since the last update.

Material Changes since the Last Update

None.

Full Brochure Available

Whenever you would like to receive a complete copy of our Firm Brochure, please contact Daniel C. Kiley by telephone at: (513)769-4040 or by email at: dan.kiley@rca-online.com.

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Advisory Business

Firm Description

The Retirement Corporation of America (“RCA”) is an Ohio corporation formed on October 14, 1988 by Daniel C. Kiley. RCA has been registered as an investment adviser with the Securities and Exchange Commission since that time.

RCA provides investment advice and retirement planning to individuals and their related entities, high net worth individuals, pension and profit sharing plans and participants, trusts, estates, charitable organizations, corporations or business entities. RCA works closely with clients to define their financial objectives and to develop strategies for reaching those objectives, some of which may include: investment management, employee benefit and 401(k) guidance, budget planning and withdrawal rate analysis, tax planning, insurance analysis, charitable goals, estate planning, family business succession issues, or other items specific to the client. RCA delivers these advisory services with staff that includes four Certified Financial Planners® and a Chartered Retirement Plans Specialist.

RCA also provides financial education offerings to its individual clients and corporate clients, at no charge, utilizing programs we offer through our Retirement University®.

Potential clients are offered a complimentary consultation with one of RCA’s advisory representatives. This initial meeting may be by phone, or in our office, and is considered an exploratory interview to determine the extent to which a potential client may benefit from the investment management and/or retirement planning services offered by our firm.

All assets under the management of RCA are held by independent broker-dealer custodians, such as Fidelity Investments, TD Ameritrade or others. Client assets held by these independent broker-dealer custodians are registered in the name of the client.

RCA does not provide legal, accounting or real estate services. If a client requests this type of assistance, RCA may recommend other professionals such as lawyers, accountants, real estate agents and mortgage lenders to deliver these services. Clients are under no obligation to follow RCA’s recommendations or to engage the services of any of these professionals. If a client does engage any of these recommended professionals, and a dispute occurs, the client agrees to seek recourse exclusively from the professional they have directly engaged.

Principal Owners

Daniel Kiley and the Kiley Family Special Trust are the principal owners of RCA.

Types of Advisory Services

The primary types of advisory services offered by RCA are specialized retirement planning and investment supervisory services, also known as asset management. Three client programs through which these RCA advisory services may be offered include:

Retire In Comfort® Program

This RCA client program is designed for individuals who are planning to retire during the next 24-36 months, or individuals who have already retired. In most cases, clients in this program are taking regular income distributions from their accounts in order to replace the cash flow that they received from their paycheck while they were still working. Potential clients in this program are offered a complimentary consultation with one of RCA's advisory representatives. This initial meeting may be in our office, or by phone and is considered an exploratory interview to determine the extent to which a potential client may benefit from the investment management and/or retirement income planning services offered by RCA.

Investment advisory services offered through this program are specifically tailored to meet the needs of each client. Prior to delivering investment advisory services, an advisory representative from RCA will ascertain each client's specific investment objective. Then RCA portfolio managers will allocate, or recommend that the client allocate, their investment assets consistent with the designated investment objective.

For clients in the Retire In Comfort® Program, RCA may furnish advice on matters not involving securities, such as:

Retirement Income Planning	Personal Financial Planning
Withdrawal Rate Analysis	Education Planning
Cash Flow & Budgeting	Employee Benefits & 401(k) Guidance
Insurance Review & Planning	Corporate Retirement Plan Guidance
Estate & Charitable Gift Planning	Tax Planning

Clients may impose reasonable restrictions on any of RCA's investment advisory services at any time, but restrictions must be delivered to RCA in writing, and must be signed by the client.

Please note: It is always the client's responsibility to promptly notify RCA if there is any change in their financial situation or investment objective. This notification of change allows RCA an opportunity to review, evaluate, or revise our previous recommendations or services.

Accumulate With Confidence Program

This RCA client program is designed for individuals who are primarily accumulating assets and do not need to take a series of regular income distributions from their account. In most cases, clients in this program are earning a regular stream of income and have additional assets to periodically invest into their accounts. Potential clients in this program are offered a complimentary consultation with one of RCA's advisory representatives. This initial meeting may be in our office, or by phone and is considered an exploratory interview to determine the extent to which a potential client may benefit from the investment management or planning services offered by RCA.

Investment advisory services offered through this program are specifically tailored to meet the needs of each client. Prior to delivering investment advisory services, an advisory representative from RCA will ascertain each client's specific investment objective. Then RCA portfolio managers will allocate, or recommend that the client allocate, their investment assets consistent with the designated investment objective.

For clients in the Accumulate With Confidence Program, RCA may furnish advice on matters not involving securities, such as:

Cash Flow & Budgeting	Tax Planning
Insurance Review & Planning	Education Planning
Estate Review & Planning	Employee Benefits & 401(k) Guidance

Clients may impose reasonable restrictions on any of RCA's investment advisory services at any time, but restrictions must be delivered to RCA in writing, and must be signed by the client.

Please note: It is always the client's responsibility to promptly notify RCA if there is any change in their financial situation or investment objective. This notification of change allows RCA an opportunity to review, evaluate, or revise our previous recommendations or services.

Money Masters Investment Program

This RCA client program is designed for individuals who desire to use the Internet as the primary channel of interaction with our firm. Clients in this program will enter their profile information online, including details such as amount of account funding, investment objectives, risk tolerance, investment time horizon, age, employment status, likelihood of significant withdrawals from the account. Prior to delivering investment advisory services, an advisory representative from RCA will review each client's specific investment objective. Then RCA portfolio managers will recommend an allocation model for the client's investment assets consistent with the designated investment objective and profile information submitted by the client online to our firm. RCA generally recommends one of six Money Masters asset allocation models, ranging from relatively conservative to relatively aggressive. In the

order moving from most conservative to most aggressive, the models recommended to clients are known as Income, Income Plus, Balanced, Balanced Plus, Growth and Growth Plus. Clients are free to accept or reject the investment strategy recommendation made by RCA. Also, investment strategy recommendations in the Money Masters Program are made by RCA without considering potential tax consequences to the client. The client is responsible for any tax liabilities resulting from transactions (including any liabilities arising from the addition or withdrawal of assets from the client's account).

Clients in the Money Masters Program must authorize RCA to exercise discretionary trading authority over the assets dedicated to the client's recommended Money Masters investment strategy, which includes the initial allocation and ongoing rebalancing. The discretionary authority allows RCA to buy, sell or otherwise trade the assets in the client's account without prior approval of each transaction. RCA is not authorized to withdraw cash or securities from the client's account other than in connection with the payment of RCA's advisory fees, as described in the "Fees and Compensation" section of this Brochure.

Reports summarizing the client's current asset allocation, transactions and current holdings can be accessed at any time through the client website at www.moneymasters.com. Clients are encouraged to visit the website on a regular basis to review their account details.

Please note: It is always the client's responsibility to promptly notify RCA if there is any change in their financial situation or investment objective. This notification of change allows RCA an opportunity to review, evaluate, or revise our previous recommendations or services.

Other Services

Managed Non-Discretionary Assets

In addition to providing investment management of client assets on a discretionary basis, RCA, for a separate and additional fee, provides certain limited services to clients with respect to "Managed Non-Discretionary Assets". These services consist solely of the following:

RCA is available to consult with the client on a semi-annual basis (or more often if requested by the client) regarding the Managed Non-Discretionary Assets. However, the client is solely responsible for all decisions and consequences on the client's Managed Non-Discretionary Assets, including decisions on whether to retain or sell all or a portion of the Managed Non-Discretionary Assets. This responsibility remains solely with the client regardless of whether any security is reflected on account reports prepared by The Retirement Corporation of America.

RCA is available to service Managed Non-Discretionary Assets, such as setting up and monitoring regular distributions and special one-time distribution requests.

RCA can process any trades on the Managed Non-Discretionary Assets, but only when requested to do so by the client in writing. Upon receipt of any client's written request, RCA will endeavor, but cannot guarantee, that any such transaction will be effected on the day received or at any specific time or price.

Limitations for Non-Discretionary Assets

Clients that engage RCA on a non-discretionary investment advisory basis must be willing to accept that RCA cannot effect any account transactions without obtaining prior written consent to any such transaction(s) from the client. Thus, in the event of a market correction during which the client is unavailable, RCA will be unable to effect any account transactions (as it would for its discretionary accounts) without first obtaining the client's written consent.

Consulting and Implementation Services

RCA does not hold itself out as providing financial planning, estate planning or accounting services. If a client requests a specific service, RCA *may* provide limited consultation services to its investment management clients on investment and non-investment related matters, such as retirement and pre-retirement income planning, income and budget planning, tax planning, insurance planning, estate planning and other services. RCA does not receive a separate or additional fee for any of these consultation services. RCA representatives may be an attorney or an accountant, but these persons do not offer any of these services to RCA's clients in these capacities. If a client requests assistance, RCA may recommend the services of other professionals for certain non-investment implementation purposes (such as attorneys, accountants, etc.). The client is under no obligation to engage the services of any professional recommended or suggested by RCA. The client has the absolute right to choose its professional and to ignore any recommendation made by RCA.

Tailored Relationships

At RCA, advisory services are tailored to the specific needs of each client. Prior to providing advisory services, RCA will ascertain each client's investment goals and objectives. RCA then allocates and/or recommends that the client allocate investment assets consistent with the designated investment objective. The client may, at anytime, impose reasonable restrictions on RCA's services, but restrictions must be delivered to RCA in writing, and must be signed by the client.

In performing services for the client, RCA is not required to verify any information it received from the client or from the client's other professionals and RCA is expressly authorized by the client to rely on this information.

Each client is advised that it remains the client's responsibility to promptly notify RCA if there is ever any change in the client's financial situation or investment objectives for the purpose of reviewing, evaluating or revising RCA's previous recommendations or services to the client.

Managed Assets

As of December 31, 2011, RCA manages approximately \$363.7 million in total assets included within 1804 portfolio accounts. Approximately \$358.5 million of this total is managed on a discretionary basis, and \$5.2 million is managed on a non-discretionary basis.

Fees and Compensation

Managed Discretionary Asset Fees

RCA bases its annual investment management fee for managed discretionary assets upon a percentage (%) of the market value of the assets and the specific types of investment management services provided in the applicable program. RCA's annual investment management fees for discretionary assets under management in all three programs are as follows:

<u>Portfolio Assets Under Management (AUM)</u>	<u>Percent of Assets</u>
AUM up to \$500,000	1.50% annually
AUM of \$500,000 to \$1,000,000	1.25% annually
AUM of \$1,000,000 to \$5,000,000	1.00% annually
AUM over \$5,000,000	0.80% annually

Managed Non-Discretionary Asset Fees

The annual investment management fee charged on Managed Non-Discretionary Assets is 0.20%. This fee shall be prorated and paid quarterly, in arrears, based upon the market value of the managed non-discretionary assets on the last business day of the previous quarter.

Negotiated Fees

RCA, in its sole discretion, may reduce its investment management fee based upon certain factors, like anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, negotiations with client and other considerations.

Billing of Fees

RCA's investment management fees are billed quarterly, in arrears (meaning that we invoice clients *after* the three-month billing period has *ended*) based upon the market value of the assets on the last business day of the previous quarter. RCA clients generally provide their consent in advance to direct debiting of investment management fees from their custodial account. RCA's *Investment Advisory Agreement* and the custodial/ clearing agreement authorize the custodian to debit the client account for the amount of RCA's investment management fee, and to directly remit that investment management fee to RCA in compliance with regulatory procedures. In the limited event that RCA bills the client directly, payment in full is expected upon presentation of the invoice.

Other Fees

Unless clients direct otherwise or an individual client's circumstances require, RCA generally recommends that TD Ameritrade Institutional ("TD Ameritrade") or Fidelity Investments Institutional Services Company, Inc. ("Fidelity") serve as the broker-dealer/custodian for client investment accounts. Broker-dealers such as TD Ameritrade or Fidelity may charge brokerage commissions and/or transaction fees for effecting certain securities transactions. For example, these custodians may charge commissions for individual equity and fixed income securities transactions or fees may be charged for certain no-load mutual fund transactions. In addition to RCA's investment management fee, custodial brokerage commissions and/or transaction fees, clients will also incur, relative to all mutual fund and exchange traded fund purchases, charges imposed at the fund level (e.g. management fees and other fund expenses).

Commission Transactions

RCA primarily recommends the purchase of no-load mutual fund securities for implementing investment recommendations. RCA does not actively direct clients to traditional, full service /commission brokers. Most of RCA's clients do not use traditional brokers. As described earlier, RCA generally recommends using the services of a centralized custodian/discount broker such as TD Ameritrade or Fidelity.

However, clients can also elect to engage certain representatives of RCA, in their individual capacities as registered representatives of Triad Advisors, Inc. ("Triad"), an SEC registered and FINRA member broker-dealer to implement investment or insurance recommendations on a commission transaction basis. In the event the client chooses to purchase commissionable investments or insurance products (such as life insurance, long-term care insurance, variable annuities and others) through Triad, Triad will charge brokerage commissions to effect securities or insurance transactions, a portion of which commissions Triad shall pay to RCA's representatives, as applicable. The brokerage and insurance product commissions charged by Triad may be higher or lower than those charged by other broker-dealers or insurance agents. In addition, Triad, as well as RCA's representatives, relative to commission mutual fund purchases, may also receive additional ongoing 12b-1 trailing commission compensation directly from the mutual fund company during the period that the client maintains the mutual fund investment. The recommendation that a client purchase any commission product from an RCA representative presents a conflict of interest, as the receipt of commissions may provide an incentive to recommend investment or insurance products based on commissions to be received, rather than on a particular client's need.

Please Note:

When RCA's representatives sell an investment or insurance product on a commission basis, RCA does not charge an advisory fee in addition to the commissions paid by the client for such product. When providing services on an advisory fee basis, RCA's representatives do not also receive commission compensation for such advisory services (except for any ongoing 12b-1 trailing commission compensation that may be received as previously discussed). However, a client may engage RCA to provide investment management services on an advisory fee basis and separate from such advisory services purchase an investment product from RCA's representatives on a separate commission basis.

No client is under any obligation to purchase any commission products from RCA's representatives. Clients may purchase investment and insurance products recommended by RCA through other, non-affiliated broker dealers or insurance agents. RCA's Chief Executive Officer and Chief Compliance Officer, Daniel C. Kiley, is available to answer any questions that a client or future client may have on this conflict of interest.

Performance-Based Fees

Sharing of Capital Gains

RCA and its supervised persons do not accept performance-based fees.

Types of Clients

Description

RCA generally provides investment advice to individuals, high net worth individuals, pension and profit sharing plan participants, trusts, estates, charitable organizations, corporations or business entities.

Client Programs and Account Minimums

Retire In Comfort[®] Program:

RCA generally requires an account minimum of \$1,000,000 for investment management services provided in the Retire in Comfort Program.

When a consolidated client account value in this program falls below \$1,000,000 in value, the minimum quarterly fee of \$2,500 may be charged.

Clients in this program with assets at or below the minimum account size may pay a higher percentage rate for their annual advisory fees than clients in this program with significantly greater assets under management.

Accumulate With Confidence Program:

RCA generally requires an account minimum of \$200,000 for investment management services provided in its Accumulate With Confidence Program.

When a consolidated client account value in this program falls below \$200,000 in value, the minimum quarterly fee of \$750 may be charged.

Clients in this program with assets at or below the minimum account size may pay a higher percentage rate for their annual advisory fees than clients in this program with significantly greater assets under management.

Money Masters Investment Program:

RCA does not require an account minimum for investment management services provided in its online Money Masters Investment Program. However, new clients in this program may incur a one time "New Client Establishment Fee" of \$95. The New Client Establishment Fee is due and payable at the time the new custodial account is initially funded. Clients in this program with minimum assets may pay a higher percentage rate for their

annual advisory fees than clients in this program with significantly greater assets under management.

RCA may reduce fees or waive minimum asset requirements:

RCA, in its sole discretion, may reduce its investment management fee or reduce or waive its minimum asset requirement for these three programs based upon certain factors, like anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition and other considerations. Exceptions may also apply to employees of RCA and their relatives, or relatives of existing clients.

Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis

Security analysis methods may include fundamental analysis, technical analysis, charting and cyclical analysis.

The main sources of information for analysis include financial newspapers and magazines, inspections of corporate activities, research materials prepared by others, corporate rating services, annual reports, prospectuses, filings with the Securities and Exchange Commission, and company press releases.

Additional research tools and sources of information that RCA may use include Zephyr Analytics, RiskGrade Analysis, Morningstar Principia mutual fund and stock information, Advisor Intelligence, and many other reports located on the internet using the World Wide Web.

Investment Strategies

RCA may utilize the following investment strategies when implementing investment advice given to clients:

- Long Term Purchases: (securities held at least a year)
- Short Term Purchases: (securities sold within a year)
- Trading: (securities sold within thirty (30) days)
- Options (contract for the purchase or sale of a security at a predetermined price during a specific period of time)

Strategic and Tactical Asset Allocation may be utilized with domestic mutual funds, exchange-traded funds, or stocks and bonds as the core investments. Global mutual funds, sector funds and specialty exchange-traded funds may be added as satellite positions. Portfolios may be further diversified among large, medium and small sized investments in an effort to control the risk associated with traditional markets.

Investment strategies designed for each client are based upon specific objectives stated by the client during consultations. Clients may change their

specific objectives at any time. Each client executes an Investment Policy Statement that documents their specific objectives and their desired investment strategy.

Please Note: Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy recommended or undertaken by RCA will be profitable or equal any specific performance level.

Risks of Loss

Currently, RCA primarily allocates investment management assets of its client accounts among individual various no-load or fee-waived mutual funds and/or independent investment programs (enabling RCA's clients to obtain mutual fund asset allocation strategies), on a discretionary basis in accordance with the client's designated investment objective(s). RCA's various methods of analysis and investment strategies do not present any significant or unusual risks.

However, every method of analysis has its own inherent risks. To perform an accurate market analysis RCA must have access to current/new market information. RCA has no control over the dissemination rate of market information; therefore, unbeknownst to RCA, certain analyses may be compiled with outdated market information, severely limiting the value of RCA's analysis. Furthermore, an accurate market analysis can only produce a forecast of the direction of market values. There can be no assurances that a forecasted change in market value will materialize into actionable and/or profitable investment opportunities.

RCA's primary investment strategies - Long Term Purchases, Short Term Purchases, and Trading - are fundamental investment strategies. However, every investment strategy has its own inherent risks and limitations. For example, longer term investment strategies require a longer investment time period to allow for the strategy to potentially develop. Shorter term investment strategies require a shorter investment time period to potentially develop but, as a result of more frequent trading, may incur higher transactional costs when compared to a longer term investment strategy. Trading, an investment strategy that completes the purchase and sale of securities within a thirty (30) day investment time period, involves a very short investment time period but will incur higher transaction costs when compared to a short term investment strategy and substantially higher transaction costs when compared to a longer term investment strategy.

Investment strategies recommended by RCA may also be subject to some or all of the following types of risk:

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They may carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many investors are interested in buying or selling a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

Please Note: In light of these risks of loss and potentially enhanced volatility, clients may direct RCA, in writing at any time, not to employ any or all of the investment strategies recommended by RCA for their account.

Disciplinary Information

Legal and Disciplinary

RCA has not been the subject of any disciplinary actions.

Other Financial Industry Activities and Affiliations

Other Financial Industry Activities

RCA is not registered as a securities broker-dealer, futures commission merchant, commodity pool operator or commodity trading advisor.

Affiliations

RCA employs advisory representatives that are also registered representatives of Triad, an SEC registered and FINRA member broker-dealer. Clients can choose to engage these registered representatives of Triad, in their individual capacities, to effect securities and insurance brokerage transactions on a commission basis. The recommendation by an RCA advisory representative (who is also a registered representative of Triad) that a client purchase a securities or insurance commission product presents a conflict of interest, as the receipt of commissions may provide an incentive to recommend investment or insurance products based on commissions to be received, rather than on a particular client's need. No RCA client is under any obligation to purchase any commission products from any RCA advisory representative. Clients are reminded that they may purchase securities or insurance products recommended by RCA through other, non-affiliated broker-dealers or insurance agents. Daniel C. Kiley, RCA's Chief Executive Officer and Chief Compliance Officer, is available to answer any questions that a client or future client may have on Triad, or any conflict of interest this arrangement may create.

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

Code of Ethics

RCA maintains an investment policy for personal securities transactions at its business and it is part of RCA's general Code of Ethics. RCA establishes the standard of business conduct for all employees that are based on the fundamental principles of openness, integrity, honesty and trust.

RCA also maintains and enforces written policies reasonably designed to prevent RCA or any person associated with RCA from misusing material non-public information to comply with Section 204A of the Investment Advisers Act of 1940.

Neither RCA, nor any related person of RCA, will recommend, buy, or sell securities within client accounts which RCA or a related person of RCA may have a material financial interest.

A copy of RCA's Code of Ethics is available to any client or future client upon request.

Participation or Interest in Client Transactions

RCA and/or representatives of RCA may buy or sell securities, including mutual funds and electronically traded funds (ETF's) that are also recommended to clients. However, trading is monitored so that RCA and/or representatives of the firm are not in a position to materially benefit from the sale or purchase of those securities. Practices such as "scalping" (i.e., a practice whereby the owner of shares of a security recommends that security for investment and then immediately sells it at a profit upon the rise in the market price which follows the recommendation) could take place if RCA did not have adequate policies in place to detect such activities and other potentially abusive practices.

Personal Trading

As noted above, RCA maintains a personal securities transaction policy to monitor the personal securities transactions and securities holdings of each of the firm's "Access Persons". RCA's securities transaction policy requires that each Access Person must provide the Chief Compliance Officer or his designee with a written report of their current securities holdings within ten (10) days after becoming an Access Person. Additionally, each Access Person must provide the Chief Compliance Officer or his designee with a written report of their current securities holdings at least once each twelve (12) month period thereafter on a date that RCA selects.

RCA's Personal Securities Transaction Policy attempts to ensure that the personal trading of RCA Access Persons does not affect the markets, and that clients of the firm always receive preferential treatment.

Brokerage Practices

Selecting Brokerage Firms

In the event that clients request that RCA recommend a broker-dealer/custodian for execution and custodial services, RCA generally recommends that investment management accounts be maintained at TD Ameritrade or Fidelity. Prior to engaging RCA to provide investment management services, clients will be required to enter into a formal Investment Advisory Agreement setting forth the terms and conditions under which RCA shall manage the client's assets, and a separate custodial/clearing agreement with each designated broker-dealer custodian.

Best Execution

Factors that RCA considers in recommending TD Ameritrade or Fidelity (or any other broker-dealer custodian) to our clients may include their historical relationship with our firm, financial strength, reputation, execution capabilities, pricing, research, and service.

Although the commissions and/or transaction fees paid by RCA's clients shall comply with our duty to obtain best execution, a client may pay a commission that is higher than another qualified broker-dealer might charge to effect the same transaction where RCA determines, in good faith, that the commission/transaction fee is reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of broker-dealer services. These services include the value of research provided, execution capability, commission rates, and responsiveness.

Accordingly, although RCA will seek competitive rates, we may not necessarily obtain the lowest possible commission rates for client account transactions. The brokerage commissions or transaction fees charged by the designated broker-dealer custodian are exclusive of, and in addition to, RCA's investment management fee. RCA's best execution responsibility is qualified when securities that we purchase for client accounts are mutual funds that trade at net asset value, which is determined at the daily market close.

Directed Brokerage Arrangements

RCA does not generally accept directed brokerage arrangements (when a client requires that account transactions be effected through a specific broker-dealer). In such client directed arrangements, the client will negotiate terms and arrangements for their account with that broker-dealer, and RCA will not seek better execution services or prices from other broker-dealers or be able to "batch" the client's transactions for execution through other broker-dealers with orders for other accounts managed by RCA. As a result, the client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for their directed brokerage account than would otherwise be the case.

Please Note: In the event that the client directs RCA to effect securities transactions for the client's accounts through a specific broker-dealer, the client correspondingly acknowledges that such direction may cause the accounts to incur higher commissions or transaction costs than the accounts would otherwise incur had the client determined to effect account transactions through alternative clearing arrangements that may be available through RCA.

Order Aggregation

To the extent that the RCA provides investment management services to its clients, the transactions for each client account generally will be effected independently, unless RCA decides to purchase or sell the same securities for several clients at approximately the same time. RCA may (but is not obligated to) combine or “bunch” such orders to obtain best execution, to negotiate more favorable commission rates or to allocate equitably among RCA’s clients differences in prices and commissions or other transaction costs that might have been obtained had such orders been placed independently. Under this procedure, transactions will be averaged as to price and will be allocated among clients in proportion to the purchase and sale orders placed for each client account on any given day. RCA shall not receive any additional compensation or remuneration as a result of such aggregation.

Trading Error Policy

RCA generally reimburses client accounts for losses resulting from RCA’s trade errors, but does not credit client accounts for trade errors resulting in market gains. The gains and losses are reconciled within RCA’s custodian firm accounts and RCA retains the net gains and losses.

Research and Additional Benefits

Although not a material consideration when determining whether to recommend that a client utilize the services of a particular broker-dealer/custodian, RCA may receive from TD Ameritrade or Fidelity (or another broker-dealer/custodian) without cost or at a discount some support services and/or products, certain of which assist RCA to better monitor and service client accounts maintained at such institutions. Included within the support services that may be obtained by RCA may be investment-related research, pricing information and market data, software and other technology that provide access to client account data, compliance and/or practice management-related publications, discounted or gratis consulting services, discounted and/or gratis attendance at conferences, meetings, and other educational and/or social events, marketing support, computer hardware and/or software and/or other products used by RCA while it is performing its investment advisory business operations.

RCA participates on the TD Ameritrade Advisor Panel and advises the senior management of TD Ameritrade on issues relevant to the independent advisor community and its clients. In addition, panel members have the opportunity to share best practices among independent investment advisors. Panel members are not compensated, but are paid or reimbursed travel by TD Ameritrade for their meal and lodging expenses incurred from their

participation on this panel. The receipt of any economic benefit may create the potential for a conflict of interest.

As indicated above, certain of the support services and/or products that may be received may assist RCA in managing and administering client accounts. Others do not directly provide such assistance, but rather assist RCA to manage and further develop its business enterprise.

RCA's clients do not pay more for investment transactions effected and/or assets maintained at TD Ameritrade or Fidelity as a result of these arrangements. There is no corresponding commitment made by the RCA to TD Ameritrade or Fidelity or any other any entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as result of the above arrangements. Daniel C. Kiley, RCA's Chief Executive Officer and Chief Compliance Officer, is available to answer any questions that a client or future client may have on this arrangement or any perceived conflict of interest these arrangements may create.

Review of Accounts

Periodic Reviews

RCA Principals and advisory representatives conduct account reviews on an ongoing basis for clients that receive investment supervisory services. RCA advises all investment supervisory clients that it is the client's responsibility to notify RCA of any changes in their investment objectives or financial situation. All clients are encouraged to review their financial planning issues (to the extent applicable), investment objectives and account performance with advisory representatives at RCA on an annual basis, either in person or by phone.

Review Triggers

In addition to periodic reviews, RCA **may** conduct account reviews when a triggering event, like a change in client investment objectives, financial situation, market correction or client request occurs.

Regular Reports and Electronic Delivery

Clients are provided, at least quarterly, with written transaction confirmation notices and summary account holding statements directly from the broker-dealer/custodian for those client accounts. RCA also provides clients with a written quarterly report summarizing account activity and performance.

All client correspondence, as well as all books and records of the Firm, will be delivered and stored as electronic images and the originals of the

electronically stored documents shall be destroyed. Thereafter, all electronic documents shall be deemed to serve as an original copy.

Client Referrals and Other Compensation

Other Compensation

As referenced earlier under “Research and Additional Benefits”, RCA may receive an indirect economic benefit from TD Ameritrade or Fidelity. RCA may also receive without cost, or at a discount, support services and/or products from TD Ameritrade or Fidelity.

RCA’s clients do not pay more for investment transactions effected and/or assets maintained at TD Ameritrade or Fidelity as a result of this arrangement. There is no corresponding commitment made by the RCA to TD Ameritrade or Fidelity or any other any entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as result of the above arrangement. Any client or future client may ask Daniel C. Kiley, RCA’s Chief Compliance Officer, to answer any questions they may have on these arrangements or any actual or perceived conflict of interest.

Client Referrals

RCA has created an Ambassador Program in order to compensate certain qualified solicitors for client referrals under guidelines provided by the SEC. RCA will document any solicitor arrangements using our Ambassador Program with appropriate agreements and disclose any fees to a person who may become a future client of RCA, including providing a copy of the Firm Brochure.

Please Note: Future clients of RCA will not pay any more than our applicable investment advisory fees (as outlined earlier in “Fees and Compensation”) as a result of being referred through a solicitor arrangement under our Ambassador Program.

Custody

Account Statements

Clients are provided, at least quarterly, with transaction confirmation notices and regular written account statements directly from the broker-dealer/custodian for the client accounts. RCA has an agreement with its broker-dealer/custodians to have its advisory fees for each client debited by the client’s custodian on a monthly or quarterly basis. RCA may also provide a written periodic report summarizing account activity and performance.

Please Note: To the extent that the RCA provides clients with periodic account statements or reports, the client is urged to compare any statement

or report provided by RCA with the account statements received from the custodian selected for their account.

Please Also Note: RCA has an agreement with its broker-dealer/custodians to have its advisory fees for each account debited by the client's custodian on a quarterly basis. The account custodian does not verify the accuracy of RCA's advisory fee calculation.

Investment Discretion

Discretionary Authority for Trading

Clients can determine to engage RCA to provide investment advisory services on a discretionary basis. Prior to RCA assuming discretionary authority over a client's account, the client is required to execute an *Investment Advisory Agreement*, naming RCA as client's attorney and agent in fact, granting RCA full authority to buy, sell, or otherwise effect investment transactions involving the assets in the client's name found in the discretionary account.

Clients who engage the RCA on a discretionary basis may, at anytime, impose restrictions, in writing, on RCA's discretionary authority (i.e. limit the types/amounts of particular securities purchased for their account, exclude the ability to purchase securities with an inverse relationship to the market, limit RCA's use of margin, etc.).

Voting Client Proxies

Proxy Votes

RCA is responsible for voting client proxies, but the client can direct RCA to not vote proxies in writing. The client maintains exclusive sole responsibility for all legal proceedings, class action suits or other events pertaining to the account assets. RCA votes proxies according to its Proxy Voting Policy. A client may request a copy of RCA's Proxy Voting Policy. RCA monitors corporate actions of individual issuers and investment companies consistent with RCA's fiduciary duty to vote proxies in the best interests of its clients. RCA has engaged the services of Broadridge Investor Communication Solutions ("Broadridge") to assist with proxy voting. Although the factors RCA considers in a proxy vote may differ on a case by case basis, they may include a review of recommendations from issuer's management, shareholder proposals, cost effects of such proposals, effect on employees and executive and director compensation. It is RCA's general policy, however, to vote in accordance with management and the recommendations of Broadridge. Individual issuers may solicit RCA to vote on matters including corporate governance, adoption or amendments to compensation plans (including stock options), and matters involving social issues and corporate responsibility.

Investment companies, like mutual funds, may solicit RCA to vote on matters including the approval of advisory contracts, distribution plans, and mergers. RCA maintains records on its proxy voting as required by Rule 204-2 (c)(2) of the Advisers Act. Copies of Rules 206(4)-6 and 204-2(c)(2) are available to clients upon written request. Clients may request further information as to how RCA voted on any specific proxy issues by contacting Daniel C. Kiley, RCA's Chief Executive Officer and Chief Compliance Officer.

Financial Information

Financial Condition

Registered investment advisers are required to provide you with certain financial information or disclosures about their financial condition.

RCA is not aware of any financial condition that is reasonably likely to impair its ability to meet its contractual commitments relating to its discretionary authority over certain client accounts.

RCA does not require pre-payment of its advisory fees six months or more in advance.

RCA has not been the subject of a bankruptcy petition.

Contacting RCA's Chief Executive Officer and Chief Compliance Officer

Chief Executive Officer and Chief Compliance Officer: Daniel C. Kiley

Any questions about RCA or the supervision of RCA employees can be directed to Daniel C. Kiley by phone at (513) 769-4040 or by email at: dan.kiley@rca-online.com.

Brochure Supplement (Part 2B of Form ADV)

Education and Business Standards

RCA requires that any employee of the firm whose responsibilities involve determining or giving investment advice to clients must:

1. Have a bachelor's degree and further coursework demonstrating knowledge of investments, financial planning, accounting, or tax planning.
2. Have a minimum of five years work experience that demonstrates their aptitude for financial planning and investment management.
3. Be a Certified Financial Planner™ (“CFP®”); Certified Public Accountant (“CPA”), Certified Financial Analyst (“CFA”) charterholder, Chartered Retirement Plans Specialist (“CRPS”), Masters of Business Administration (“MBA”), be an Attorney, or be actively pursuing one of these professional designations.
4. Subscribe to the Code of Ethics and Professional Responsibility provided by the Certified Financial Planner™ (CFP®) Board of Standards.
5. Be properly licensed for all advisory activities in which they are engaged.

Professional Certifications

RCA employees have earned certifications and credentials that are explained below in further detail:

CERTIFIED FINANCIAL PLANNER™

Certified Financial Planners™, CFP® and federally registered CFP (with flame design) marks (collectively, the CFP® marks) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”). The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners or advisors to hold CFP® certification.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that the CFP Board has determined is necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;

- Examination – Pass the comprehensive CFP® Certification Exam. This examination is administered in 10 hours over a two-day period, includes case studies and client scenarios designed test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or equivalent measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board's Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must also complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks;

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with the developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require the CFP® professionals to provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

CHARTERED RETIREMENT PLANS SPECIALIST OR CRPS®

Individuals who hold the CRPS® designation have completed a course of study encompassing design, installation, maintenance and administration of retirement plans. Additionally, individuals must pass an end-of-course examination that tests their ability to synthesize complex concepts and apply theoretical concepts to real-life situations.

All designees have agreed to adhere to Standards of Professional Conduct and are subject to a disciplinary process.

Designees renew their designation every two-years by completing 16 hours of continuing education, reaffirming adherence to the Standards of Professional Conduct and complying with self-disclosure requirements.

CHARTERED FINANCIAL ANALYST

To earn a CFA charter, you must have four years of qualified investment work experience, become a member of CFA Institute, pledge to adhere to the CFA Institute Code of Ethics and Standards of Professional Conduct on an annual basis, apply for membership to a local CFA member society, and complete the CFA Program.

The CFA Program is organized into three levels, each culminating in a six-hour exam. The Program reflects a broad Candidate Body of Knowledge™ (CBOK) developed and continuously updated by active practitioners to ensure that charterholders possess knowledge grounded in the real world of today's global investment industry.

Daniel C. Kiley, CFP® - Chief Executive Officer and President

Date of birth: 07/06/59

Educational Background:

- Harvard University Cum Laude General Studies (1977-1981)
- Certified Financial Planner (1988)

Business Experience:

- Founder and Chief Executive Officer of The Retirement Corporation of America, a registered investment advisory firm (1988 to Present).
- Co-Founder and Chief Executive Officer of Money Masters LLC.

Other Business Activities:

- Registered Representative of Triad.
- Member of TD Ameritrade Institutional Advisor Panel to advise TD Ameritrade on issues relevant to independent advisors and their clients. (2012)

Additional Compensation:

- In the event that an RCA client desires, the client can engage Dan Kiley in his individual capacity as a registered representative of *Triad Advisors, Inc.* ("*Triad*"), an SEC registered and FINRA member broker-dealer to implement investment recommendations on a commission basis, or insurance products on a commission basis. In the event the client chooses to purchase investment or insurance products through *Triad*, *Triad* will charge commissions to effect the securities or insurance transactions, a portion of which commissions *Triad* shall pay to Dan Kiley as a registered representative, as applicable. The brokerage commissions charged by *Triad* may be higher or lower than those charged by other broker-dealers. In addition, relative to commission mutual fund purchases, *Triad*, as well as Dan Kiley, may also receive additional ongoing 12b-1 trailing commission compensation directly from the mutual fund company during the period that the client maintains the mutual fund investment. Please note: RCA clients may purchase investment or insurance products recommended by RCA through other, non-affiliated broker dealers or agents.

Christopher Kiley, CFP® and CRPS® - Vice President

Date of birth: 7/05/68.

Educational Background:

- University of Notre Dame, Bachelors of Arts, History and Minor in Business Administration (1990);
- Certified Financial Planner (2005)
- Certified Retirement Planning Specialist (2006).

Business Experience:

- Chris joined RCA in 1997, and is the leader of our Advisory Services practice. As a Certified Financial Planner, Chris provides planning and investment advice to our client families. Chris is also a member of the Firm's Executive Committee, where he serves as Vice President.

Chris Kiley's expertise in the area of retirement planning includes developing income distribution plans, tax reduction strategies and maximizing corporate benefits for retiring executives at companies such as Procter & Gamble, GE, Cintas and others.

Prior to joining RCA, Chris gained valuable business experience working as a finance and marketing executive in the paper manufacturing industry with Champion International from 1990 -1995; and with Domtar Paper from 1995 - 1997.

Other Business Activities:

- None

Additional Compensation:

- None.

Supervision:

- Chris Kiley is supervised by Daniel Kiley, Chief Executive Officer and Chief Compliance Officer, and his designees, through frequent interaction, scheduled committee meetings, and a review of emails as well as other details from RCA's data management and compliance systems.

David Henning, CFP® - General Manager of Advisory Services

Date of birth: 7/30/66.

Educational Background:

- Miami University B.A. Economics (1989);
- Certified Financial Planner (2008)

Business Experience:

- David joined RCA in 2005, and currently serves in the role as General Manager - Client Advisory Services. As a Certified Financial Planner, David provides planning and investment advice to our client families. He has been instrumental in the development and implementation of RCA's Retirement Income Plan, a report designed to help retired clients manage their budget and cash flow.

Prior to joining RCA, David managed his own financial planning practice at Southport Advisors Inc. (2001 to 2005) where he created and implemented financial plans for individuals and small business owners, as well as developing and presenting educational seminars

During the period 1996 to 2001, David worked as an investment specialist and personal advisor for several Cincinnati firms including Fifth Third Securities, MDS Securities and American Express.

David acquired his life, health and variable annuity license for the State of Ohio. He also passed several securities license exams including Series 7, 63 and 65.

Other Business Activities:

- Registered Representative of Triad.

Additional Compensation:

- In the event that an RCA client desires, the client can engage David Henning in his individual capacity as a registered representative of *Triad Advisors, Inc.* ("*Triad*"), an SEC registered and FINRA member broker-dealer to implement investment recommendations on a commission basis, or insurance products on a commission basis. In the event the client chooses to purchase investment or insurance products through *Triad*, *Triad* will charge commissions to effect the securities or insurance transactions, a portion of which commissions *Triad* shall pay to David Henning as a registered representative, as applicable. The brokerage commissions charged by *Triad* may be higher or lower than those charged by other broker-dealers. In addition, relative to commission mutual fund purchases, *Triad*, as well as David Henning, may also receive additional ongoing 12b-1 trailing commission compensation directly from the mutual fund company during the period that the client maintains the mutual fund investment. Please note: RCA clients may purchase investment or insurance products recommended by RCA through other, non-affiliated broker dealers or agents.

Supervision:

- David Henning is supervised by Daniel Kiley, Chief Executive Officer and Chief Compliance Officer, and his designees, through frequent interaction, scheduled committee meetings, and a review of emails as well as other details from RCA's data management and compliance systems.

Jamie Caudill, CFP® - General Manager of Advisory Services

Date of birth: 09/28/71.

Educational Background:

- University of Kentucky, BBA, Finance (1994)
- Xavier University, MBA, Finance/Entrepreneurship (1999)
- Certified Financial Planner (2005)

Business Experience:

- Jamie joined RCA in 2009, and currently serves in the role of Senior Manager - Advisory Services. As a Certified Financial Planner, Jamie provides planning and investment advice to our client families. Prior to joining RCA, Jamie worked as a Vice-President, Senior Account Executive with Fidelity Investments in New York City. While at Fidelity, Jamie also gained valuable experience working as a Retirement Consultant where his duties included delivering educational programs to retirement plan participants. Jamie's career with Fidelity lasted 14 years (1994 to 2009). Jamie acquired a life and variable annuity license. He also passed several securities license exams including Series 7, 9, 10, 63 and 65.

Other Business Activities:

- Registered Representative of Triad.

Additional Compensation:

- In the event that an RCA client desires, the client can engage Jamie Caudill in his individual capacity as a registered representative of *Triad Advisors, Inc. ("Triad")*, an SEC registered and FINRA member broker-dealer to implement investment recommendations on a commission basis, or insurance products on a commission basis. In the event the client chooses to purchase investment or insurance products through *Triad*, *Triad* will charge commissions to effect the securities or insurance transactions, a portion of which commissions *Triad* shall pay to Jamie Caudill as a registered representative, as applicable. The brokerage commissions charged by *Triad* may be higher or lower than those charged by other broker-dealers. In addition, relative to commission mutual fund purchases, *Triad*, as well as Jamie Caudill, may also receive additional ongoing 12b-1 trailing commission compensation directly from the mutual fund company during the period that the client maintains the mutual fund investment. Please note: RCA clients may purchase investment or insurance products recommended by RCA through other, non-affiliated broker dealers or agents.

Supervision:

- Jamie Caudill is supervised by Daniel Kiley, Chief Executive Officer and Chief Compliance Officer, and his designees, through frequent interaction, scheduled committee meetings, and a review of emails as well as other details from RCA's data management and compliance systems.

Lionel Bey, MBA – Director of Portfolio Management and Research

Date of birth: 11/29/71.

Educational Background:

- Miami University, Bachelors of Science, Marketing; minor in International Business (1994)
- Xavier University, Masters in Business Administration – Finance (1998)

Business Experience:

- Lionel joined RCA in 1999 and currently serves as Investment Research and Trading Director. Over the past decade, Lionel has been instrumental in helping to develop and implement RCA's proprietary mutual fund manager screening and selection process we refer to as our Money Masters.

Other Business Activities:

- None.

Additional Compensation:

- None.

Supervision:

- Lionel Bey is supervised by Daniel Kiley, Chief Executive Officer and Chief Compliance Officer, and his designees, through frequent interaction, scheduled committee meetings, and a review of emails as well as other details from RCA's data management and compliance systems.

Robin O. Kiley, J.D. – Vice President

Date of birth: 7/28/64

Educational Background:

- University of Cincinnati, College of Arts and Sciences, B.A. in History, Magna Cum Laude (1986)
- University of Cincinnati, College of Law (1989)
- Admitted to Practice Law in Ohio in (1989)

Business Experience:

- Robin joined RCA in 2004 as Chief Compliance Officer and is currently a member of the Executive Committee serving as Vice President.
- Prior to joining RCA, Robin served as Senior Attorney for The Kroger Co. (1992-1999), where she handled real estate transactions, mergers and acquisitions, contract review, commercial financing and securities transactions. Robin also worked as an associate attorney for Thompson Hine LLP (1990-1992).

Other Business Activities:

- None.

Additional Compensation:

- None.

Supervision:

- Robin Kiley is supervised by Daniel Kiley, Chief Executive Officer and Chief Compliance Officer, through frequent interaction, scheduled committee meetings and a review of emails as well as other details from RCA's data management and compliance systems.

Marc Dizard – Portfolio Management, Research and Advisory Services

Date of birth: 2/23/1984

Educational Background:

- The Ohio State University, B.S. (Business Administration) (2006)
- Level III Candidate in the Chartered Financial Analyst Program (2012)

Business Experience:

- Marc joined RCA in 2011 and currently serves on the Investment Research and Portfolio Management Team of RCA. He also is a member of the Firm's Investment Policy Committee and Trading Committee.

Prior to joining RCA, Marc worked at Bowling Portfolio Management from 2007 until 2011 as Director of Operations and worked with the portfolio managers and research analysts of the firm.

Other Business Activities:

- None

Additional Compensation:

- None.

Supervision:

- Marc Dizard is supervised by Daniel Kiley, Chief Executive Officer and Chief Compliance Officer, and his designees, through frequent interaction, scheduled committee meetings and a review of emails as well as other details from RCA's data management and compliance systems.

Brent J. Hartman – Director of 401(k) Consulting Services

Date of birth: 4/29/1966

Educational Background:

- Brigham Young University, B.S. (Economics and Accounting) (1991)
- Purdue University, Masters of Science in Business Administration (MBA) in Finance and Investments (1993)

Business Experience:

- Brent is Director of 401(k) Consulting and Investment Services. He also serves on the Firm's Investment Policy Committee.
- Prior to joining RCA, Brent has over 16 years of experience working with institutional retirement plans of all types and sizes. This experience began with managing the 401(k) plan at Hewlett-Packard ("HP"), where Brent worked in HP's Treasury Department from 1993 until 1999. Brent then joined Fidelity Investments where he worked with some of the largest institutional retirement plans in the United States (2000-2009). He also worked as a national independent consultant for retirement plans and recently served as the Regional Director of Great-West (2010-2011).

Other Business Activities:

- None

Additional Compensation:

- None.

Supervision:

- Brent Hartman is supervised by Daniel Kiley, Chief Executive Officer and Chief Compliance Officer, and his designees, through frequent interaction, scheduled committee meetings and a review of emails as well as other details from RCA's data management and compliance systems.