

**RWM ASSET MANAGEMENT dba EDGE SOLUTIONS  
FIRM BROCHURE**

**THIS BROCHURE PROVIDES INFORMATION ABOUT THE QUALIFICATIONS AND BUSINESS PRACTICES OF RWM ASSET MANAGEMENT INC dba EDGE SOLUTIONS. IF YOU HAVE ANY QUESTIONS ABOUT THE CONTENTS OF THIS BROCHURE, PLEASE CONTACT US AT 352-343-2700. 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 OUR FIRM IS ALSO AVAILABLE ON THE SEC'S WEBSITE AT:**

**[www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)**

If you have any questions about this brochure, please contact us at:

**RWM Asset Management, LLC  
2100 Lake Eustis Dr., Tavares, FL 32778  
352.343.2700**

**A Registered Investment Advisor\*\***

*\*\*Registration does not imply a certain level of skill or training*

Please read and retain this for  
your records.

**MATERIAL CHANGES SINCE LAST BROCHURE**

Material events since our last publication of this item on 05/15/2014 include:

DBA additions (Item 4)

**TABLE OF CONTENTS**

## INTRODUCTION &amp; MATERIAL CHANGES

4. ADVISORY BUSINESS

Firm Description  
Principal Owners  
Types of Advisory Services  
Tailored Relationships  
Wrap Fee Programs  
Client Assets

5. FEES AND COMPENSATION

Fee Schedule  
Fee Billing  
Other Fees  
Fees paid in advance  
Additional Compensation

6. PERFORMANCE BASED FEES AND SIDE-BY-SIDE MANAGEMENT

Sharing of Capital Gains or Capital Appreciation

7. TYPES OF CLIENTS

Description  
Account Minimums

8. METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

Methods of Analysis  
Investment Strategies  
Risk of Loss

9. DISCIPLINARY INFORMATION

Legal or Disciplinary material events

10. OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Broker-Dealer or Registered Representative  
Material Relationships or Arrangements with Financial Industry  
Recommend or Select other Investment Advisors

11. CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

Code of ethics  
Recommending Securities with Material Financial Interest  
Investing in same Securities recommended to clients

12. BROKERAGE PRACTICES

Selecting Brokerage Firms  
Research and Soft Dollars  
Brokerage for Client Referrals  
Directed Brokerage  
Order Aggregation

13. REVIEW OF ACCOUNTS

Periodic Reviews  
Review Triggers  
Regular Reports

14. CLIENT REFERRALS AND OTHER COMPENSATION

Economic Benefits  
Third Party Solicitors

15. CUSTODY

Account Statements

16. INVESTMENT DISCRETION

Discretionary Authority for Trading and Limited Power of Attorney

17. VOTING CLIENT SECURITIES

Proxy Voting

18. FINANCIAL INFORMATION

Prepayment of Fees

#### 4. ADVISORY BUSINESS

**Firm Description.....**RWM Asset Management, LLC dba Edge Solutions ("EDGE") is an SEC Registered Investment Advisor and has been registered since 05/20014.

RWM Asset Management also operates under the dba of Edge 401k Funds.

**Principal Owners.....**Thomas H. Ruggie is 100% owner of RWM Asset Management, LLC.

**Types of Advisory Services.....**EDGE offers Retirement Plan consulting services in a 3(21) capacity to Plan Sponsors and fiduciaries. Consulting services consist of: evaluation of existing plans as well as assistance in implementing new plans for employer sponsored plans including some of all of the following: advising on plan fund offerings, cost and fee ratios, allocation strategies, maximization of plan value through employee education and participation.

**Tailored Relationships.....**Advisory services are tailored to the individual needs of the plan clients, through quantitative and qualitative analysis and discovery meetings. Plan sponsors may restrict the range of investments used in their plans via notation on their Investment Policy Statement. In performing these services, EDGE shall not be required to verify any information provided

**Wrap Fee Programs.....**EDGE does not offer wrap fee account management.

**Client Assets.....**As of 11/01/2014, the Registrant had \$1 million in assets under management on a discretionary basis.

#### 5. FEES AND COMPENSATION

**Advisory Fee...**Advisory fees are negotiable for each client's situation and tailored to each client's financial plan and custodial arrangement. Specific fee schedules will be discussed according to the plan recommended. Our advisory fees do not exceed 2%.

**Fee Billing.....**Fees are directly debited from the account by the platform custodian on our behalf and in accordance with the custodial agreements signed by the participants. Clients should review and understand this brochure, prior to engaging the Adviser's services.

We do not perform the calculations or actual fee deductions on 401(k) plan assets. The ascribed fee billing information is believed to be valid and true with respect to fee billings as performed by the custodians utilized. For purposes of calculating Account Fees, we request for plan custodians/TPA's to bill our advisory plans on a calendar quarter. Your first consulting fee deduction may include a prorated fee amount for the partial quarter, if advisory services began prior to the quarter end date. Subsequent Account Fee payments are due and assessed at the beginning of each quarter based on the value of the assets under management as of the close of business on the last business day of the preceding quarter and as valued by the third-party custodian of the account. Additional deposits and withdrawals will be added or subtracted from portfolio assets, as the case may be, which may lead to an adjustment of the advisory fee. Our fee is deducted from the plan's account pursuant to the applicable authorization agreement on file with the named custodian. Unless otherwise negotiated, our fee is payable quarterly, in advance and is exclusive of fund expenses, third party administration and execution costs. \*\*It is imperative that plan administrators review and understand their plan documents and fee disclosure statements provided for each customized plan. These are provided by your 3<sup>rd</sup> party plan administrator via quarterly fee disclosure statements.

The Management Fee assigned to the account is negotiable, and is based on the value of the assets in the account,

**Other Fees.....**In addition to the Account Fee, client may also incur certain asset based and flat fee charges in connection with investments made through program platforms and custodians. Our recommendation of outside strategies and managers will also add additional asset based management fees to the account, separate and apart from the RWM Advisory fee. If selected, **use of the registrants Collective Trust platform of funds, by the plan sponsor creates a conflict of interest. Please see below for additional conflict of interest regarding use of Collective Trust funds within your plan.**

Other fees which may be imposed by third parties include, but are not limited to, the following: custodial annual account fees, other transaction charges and account service fees, IRA and qualified retirement plan fees, mutual fund or money market 12b-1, mutual fund, ETF or money market management and administrative expenses, omnibus processing fees, sub transfer agent fees, networking fees, certain deferred sales charges on previously purchased mutual funds transferred into the account, variable annuity expenses, administrative servicing fees for trust accounts, creation and development fees or similar fees imposed by unit investment trust sponsors, hedge fund investment management fees, managed futures investor servicing fees, participation fees from auction rate preferred securities, and other charges required by law. EDGE may receive a portion of these fees through soft dollar arrangements detailed below. Further information regarding charges and fees assessed by a mutual fund, ETF or variable annuity are available in the appropriate prospectus.

**Fees paid in advance.....**Advisory fees may be paid in advance. If an advisory contract is terminated prior to the end of the billing period in which fees have been paid in advance, a refund may be requested in writing to the Advisor, and a prorated refund will be issued, with the accounts last billing amount divided by 90 and multiplied by the number of days remaining unused in the period. A refund will be issued directly to the account whenever possible.

**Additional Compensation.....**Conflicts of interest may cause a supervised person an incentive to recommend investment products based on the compensation received, rather than on a client's needs. The below outline potential conflicts of interest when dealing with our firm.

Conflict of interest: Associated persons of the advisor are registered representatives of Purshe, Kaplan, Sterling Investments (PKS), a registered broker/dealer, member of FINRA. In these capacities associated persons of the Adviser may recommend securities, insurance, or other products and receive compensation if products are purchased through the affiliated broker/dealer firm, which may be load-based commissionable products. This conflict is regulated by firm review of new accounts and purchases. Brokerage products are recommended in cases where a similar product is not available in an advisory capacity. Advisory fees will not be charged on an account that is sold through our broker/dealer. Clients are under no obligation to act upon any recommendations of the associated persons or effect any transactions through the associated persons if they decide to follow the recommendations.

Conflict of interest: Associated persons of the Adviser may also be licensed insurance agents. In this capacity associated persons of the Adviser may recommend insurance or other products, and receive compensation for those products separate from investment advisory fees.

Conflict of interest: Associated persons of the advisor provide research and investment management to a separate, affiliated RIA, Ruggie Capital Group (RCG). The registrant's owner Thomas Ruggie, also owns RCG. Clients of EDGE may be referred to RCG for personal investment services outside plan services rendered by EDGE. In recommending this, client should understand that investments with RCG will incur additional management fee separate and in addition to those fees outlined above. Because RCG is Client is encouraged to read and understand the ADV Part 2 disclosure of RCG before investing with this affiliated company.

Conflict of interest: *Edge 401k Funds* is a business group of *EDGE*, an affiliated fund management entity, owned by the Registrant's Managing Member, Thomas Ruggie. Mr. Ruggie receives a direct economic benefit from the referral to these funds. It is by the direct selection of the plan sponsor that these funds will be included in your lineup, as they will not be solicited by *EDGE* for use within your plan. Plan sponsors are under no obligation to select or offer *Edge401k Funds* in their plan lineup and should understand that there is an economic incentive for *EDGE* to recommend these specific investment products based on compensation received, rather than on client needs.

## 6. PERFORMANCE BASED FEES AND SIDE-BY-SIDE MANAGEMENT

**Sharing of Capital Gains or Capital Appreciation.....**Advisor does not participate in performance based account fees.

## 7. TYPES OF CLIENTS

**Description.....** EDGE services are available for tax qualified retirement plans intended for management in a manner consistent with the Employee Retirement Income Security Act of 1974, as amended (ERISA).

**Account Minimums.....** There is no account minimum for accounts advised by EDGE.

## 8. METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

**Methods of Analysis.....**We manage client portfolios based on the research of its investment committee. This includes various methods of research, investment style and management philosophy:

- Fundamental - (analysis performed on historical and present data, with the goal of making financial forecasts)
- Technical - (analysis performed on historical and present data, focusing on price and trade volume, to forecast the direction of prices)
- Cyclical - (analysis performed on historical relationships between price and market trends, to forecast the direction of prices)

The Registrant's method of analysis and investment strategy does not present any significant or unusual risks. However, every method of analysis has its own inherent risks. To perform an accurate market analysis the Registrant must have access to current/new market information. The Registrant has no control over the dissemination rate of market information; therefore, unbeknownst to the Registrant, certain analyses may be compiled with outdated market information, severely limiting the value of the Registrant'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.

The Registrant primarily allocates client investment choices among mutual funds, but also when available, various exchange traded funds, individual equities (stocks) and debt instruments (bonds) as well. Investment allocations are made on a non-discretionary basis in accordance with the client's designated investment objective(s).

**Risk of Loss.....**Different types of investments involve varying degrees of risk, including risk of loss. It should not be assumed that future performance of any specific investment or investment strategy will be profitable or equal any specific or past performance level. Prospective clients should read and understand this statement and all firm disclosure documents prior to engaging our firm's services.

**Specialized recommendations...**Collective Trust Funds can be made available to the plan through Alta Trust Company, a South Dakota chartered trust company that acts as trustee of the fund. Collective Investment Funds are bank maintained trust funds and are not registered with the Securities and Exchange Commission. The Declaration of Trust describes the procedures for admission to withdrawal from a Fund. The Declaration of Trust and the Fund's Employee Benefit Summary should be read in conjunction with this information which is not intended to provide legal or tax advice. Before investing in any Fund, Alta Trust recommends that you consider the Fund's investment objective, strategies, risks and expenses. Alta Trust encourages you to consult with your financial, legal and tax advisers prior to investment in any Fund. Potential participants in any Fund may obtain a copy of the Employee Benefit Summary from the plan sponsor or from Alta Trust at [info@trustalta.com](mailto:info@trustalta.com).

## 9. DISCIPLINARY INFORMATION

**Legal or Disciplinary Material events.....**Advisor and its registered personnel have no material legal or disciplinary events to disclose.

## 10. OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

### **Material Relationships or Arrangements with Financial Industry.....**

**REGISTERED REPRESENTATIVE.....**Some management persons of EDGE are also registered representatives of Purshe, Kaplan, Sterling Investments (PKS), a registered broker/dealer, member of FINRA. Presently this includes: Thomas Ruggie and Kathleen McQueen. While our primary function is that of an investment advisor, we have established the affiliation with PKS in order to best serve our clients needs. There is a potential conflict of interest if a brokerage product is recommended, as compensation will be received thorough the affiliated broker/dealer firm (PKS) and not from the client directly as in our fee-based services. Clients are under no obligation to act upon any of the brokerage recommendations of the associated person, nor are they obligated to transact the brokerage business through our firm if they so choose to follow our recommendations. In no case will we receive fees on a holding which a brokerage commission is also derived.

**INSURANCE -** Some supervised persons of EDGE are also licensed insurance agents. Presently this includes: Thomas Ruggie. While our primary function is that of an investment advisor, we have established this affiliation in order to best serve our clients needs. There is a potential conflict of interest if an insurance product is recommended, as compensation will be received thorough the insurance company and not from the client directly as in our fee-based services. Clients are under no obligation to act upon any of the insurance recommendations of the associated person, nor are they obligated to transact the insurance business through our firm if they so choose to follow our recommendations. In no case will we receive fees on an insurance holding where commission was also derived.

### **OTHER RIA -**

Thomas Ruggie acts as a consultant to 401k Generation, an affiliated RIA entity. Although similar services are offered, the purpose of the separation is for client segregation purposes and to best fit the client to the appropriate service program and fee structure. It is the client's choice which services would best fit their needs and they may utilize either firm's services without restriction. Referral fee arrangements exist between us and this firm, however this does not increase or negatively affect the client's fee rate with either firm.

Thomas Ruggie acts as President of Asset Advisors of America, LLC. Other related persons of EDGE may also be affiliated or registered with Asset Advisors of America. Presently this also includes Michael Case Smith. This RIA Company specializes in corporate retirement plan consulting. Although similar services are offered, the purpose of the separation is for client segregation purposes and to best fit the client to the appropriate service program and fee structure. It is the client's choice which services would best fit their needs and they may utilize either firm's services without restriction. Referral fee arrangements exist between us and this firm, however this does not increase or negatively affect the client's fee rate with either firm.

Thomas Ruggie acts as President of Ruggie Capital Group, Inc. Other related persons of EDGE may also be affiliated or registered with Ruggie Capital Group. This RIA provides research and personal investment management services. Referral fee arrangements exist between us and this firm, however this does not increase or negatively affect the client's fee rate with either firm.

**THIRD PARTY MANAGERS -** Some supervised persons of EDGE at times recommend other unaffiliated investment advisors or third party money managers, when specific client situation warrants.

### **BOARD AFFILIATIONS -**

Thomas Ruggie currently serves as President of the Tom and Kim Ruggie Family Foundation, Inc. This is a non-profit charitable foundation established to raise funds and direct contributions to worthwhile charities. Several RIA clients serve on the board of this foundations committee. No fees or monies are generated to us from this affiliation.

## 11. CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

**Code of Ethics.....**The Adviser has adopted a Code of Ethics for the purpose of instructing its personnel in their ethical obligations and to provide rules for their personal securities transactions. The Adviser and its personnel owe a duty of loyalty, fairness and good faith towards their clients, and the obligation to adhere not only to the specific provisions of the Code but to the general principles that guide the Code.

**Recommending Securities with Material Financial Interest.....**On occasion we may recommend the purchase of a security in which a principal or associated person of this firm already has a material financial interest in. It is our practice to always provide full disclosure of any facts which would be relevant to your decision. This would likely be a verbal disclosure with a written, signed disclosure upon effecting the transaction.

**Investing in same securities recommended to clients.....**Although we do not generally recommend individual security portfolios, on occasion an advisor or firm personnel may hold the same security that a client holds as well. With respect to this conflict, at any time trades are placed in the same security for both a client and an advisor on the same day, the customer's trade will always take time precedence over firm personnel trades.

More detail can be found in our code of ethics policy; a copy is available at your request.

The Code covers a range of topics that include: general ethical principles, reporting personal securities trading, exceptions to reporting securities trading, reportable securities, initial public offerings and private placements, reporting ethical violations, distribution of the Code, review and enforcement processes, amendments to Form ADV and supervisory procedures. The Adviser will provide a copy of the Code to any client or prospective client upon request.

## 12. BROKERAGE PRACTICES

**Selecting brokerage firms.....** In the event that the client requests that the Registrant recommend a broker-dealer/custodian for execution and/or custodial services (exclusive of those clients that may direct the Registrant to use a specific broker-dealer/custodian), Registrant generally recommends that investment management accounts be maintained at *Fidelity*, *Schwab*, and/or *TD Ameritrade*. Prior to engaging Registrant to provide investment management services, the client will be required to enter into a formal Agreement setting and a separate custodial/clearing agreement with each designated broker-dealer/ custodian.

Factors that the Registrant considers in recommending *Fidelity*, *Schwab*, and/or *TD Ameritrade* (or any other broker-dealer/custodian to clients) include historical relationship with the Registrant, financial strength, reputation, execution capabilities, pricing, research, and service. Although the commissions and/or transaction fees paid by Registrant's clients shall comply with the Registrant's 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 the Registrant determines, in good faith, that the commission/transaction fee is reasonable. 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, including the value of research provided, execution capability, commission rates, and responsiveness. Accordingly, although Registrant will seek competitive rates, it 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, Registrant's investment management fee. The Registrant's best execution responsibility is qualified if securities that it purchases for client accounts are mutual funds that trade at net asset value as determined at the daily market close.

### 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, Registrant may receive from *Fidelity*, *Schwab*, and/or *TD Ameritrade* (or another broker-dealer/custodian, investment platform and/or mutual fund sponsor) without cost (and/or at a discount) support services and/or products, certain of which assist the Registrant to better monitor and service client accounts maintained at such institutions. Included within the support services that may be obtained by the Registrant 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 Registrant in furtherance of its investment advisory business operations.

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

Registrant's clients do not pay more for investment transactions effected and/or assets maintained at *Fidelity*, *Schwab*, and/or *TD Ameritrade* as a result of this arrangement. There is no corresponding commitment made by the Registrant to *Fidelity*, *Schwab*, and/or *TD Ameritrade* or any other entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as a result of the above arrangement.

**Brokerage for client referrals.....**We do not receive client referrals from any of our affiliations, nor do we direct brokerage services to firms for this purpose.

**Directed Brokerage.....**We do not recommend or permit for clients to direct transactions or specify a broker for execution.

**Order Aggregation.....**Although not likely in any event possible, purchases and sales of securities are aggregated in order to obtain best execution for our clients. There is generally a minimum share quantity that is required in order to effect an aggregate transaction.

## 13. REVIEW OF ACCOUNTS

**Periodic Reviews.....**Because we use model portfolios, we are constantly evaluating the portfolio holdings and will make changes within client portfolios proactively when necessary, and as our discretion permits. Plans are reviewed with a frequency determined and agreed upon in our initial planning stages with a client. Frequency of contact and in-person reviews are related to the plan need levels as well as the purpose and size of the plan being managed. These reviews are important so that we may discuss and update any pertinent information regarding your plan; as well as ensure we are correctly pursuing your overall objectives with our account management.

**Review Triggers.....**Although they will be scheduled with a certain frequency, a review may be requested at any time by a client and is

recommended when significant changes occur. These reviews will be conducted by an Investment Advisor Representative of our firm.  
**Regular Reports.....**Clients are provided, at least quarterly, with written transaction confirmation notices and regular written summary account statements directly from the custodian and/or program sponsor of the plan.

#### 14. CLIENT REFERRALS AND OTHER COMPENSATION

**Economic Benefits.....**We do not have any ongoing arrangements where an economic benefit is derived from someone who is not a client, however we are sometimes approached by fund companies and such and may partake in a hosted educational event for our clients benefit. Conflict may arise when Advisor benefits from these types of events, however every investment decision is made through our firm investment committee and standardized process, without regard to financial benefits derived.

**Third Party Solicitors.....**Advisor may receive client referrals from both affiliated and unaffiliated individuals who are not its supervised persons. We currently have solicitor agreements of this nature in accordance with Rule 206(4)-3 of the Investment Advisers Act of 1940, and any corresponding state requirements. Any such referral fee shall be paid solely from the Advisors investment management fee and shall not result in any additional charges to the client. If the client is introduced to the Advisor by an unaffiliated solicitor, the solicitor at the time of the solicitation, shall disclose the nature of its solicitor relationship and provide the prospective client a copy of the Advisors disclosure documents (Investment Advisory Agreement, ADV Part II) as well as solicitation disclosure document for signature.

#### 15. CUSTODY

**Account Statements.....**Under SEC regulations we are deemed to have custody of your assets if you authorize us to instruct the custodian to pay our advisory fees directly from your account. Even with this instruction in force, the custodian maintains the actual custody of your assets. Clients will always receive account valuation statements from the custodian of their assets directly and at least quarterly. Any values given on EDGE reports should be verified against the custodian statements you receive directly.

#### 16. INVESTMENT DISCRETION

**Discretionary Authority for Trading and Limited Power of Attorney.....**Some investment accounts are managed on a discretionary basis for our clients, meaning that we will manage your portfolio and have limited power of attorney to execute transactions without obtaining specific consent prior to every transaction. This authority is assigned to accounts as designated via the Qualified Plan Consulting Agreement. Clients are free to specify when executing this contract, any limitations on our discretionary authority.

**Non-Discretionary Authority .....**Most Investment accounts are managed on a non-discretionary basis for our clients, meaning that we will manage your portfolio but obtaining specific consent prior to making any portfolio changes or reallocations to fund offerings. This authority is assigned to accounts as designated via the Qualified Plan Consulting Agreement.

#### 17. VOTING CLIENT SECURITIES

**Proxy Voting.....**We do not have authority, nor do we accept authority to vote client securities in the portfolio we manage. Upon account set up, custodians are directed to forward this information to you directly. Should you have any questions with regard to voting proxies, we remain available to assist, however we will not proactively contact you with regards to any voting issues.

#### 18. FINANCIAL INFORMATION

**Prepayment of fees.....**We do not require prepayment of fees of more than \$1,200 per client six months or more in advance.