



**RIGGS ASSET MANAGEMENT COMPANY, INC.**  
**ADV PART 2A, BROCHURE**

*This brochure provides information about the qualifications and business practices of Riggs Asset Management Company, Inc. ("Riggs"). If you have any questions about the contents of this brochure, please contact us at (570)823-3383 or [sshoemaker@riggsadvisors.com](mailto:sshoemaker@riggsadvisors.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.*

*Additional information about Riggs Asset Management Company, Inc. also is available on the SEC's web site at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*

Riggs Asset Management Company, Inc. The Grand Highlands, Two Newberry Estates, Dallas  
Pennsylvania 18612 [www.RiggsAdvisors.com](http://www.RiggsAdvisors.com)

SEC File #: 801-38171

Contact: Susan A. Shoemaker Phone: 570.823.3383

Email: [SShoemaker@riggsadvisors.com](mailto:SShoemaker@riggsadvisors.com)

*Registration does not imply any level of skill or training.  
December 2, 2024*

Item 2    Material Changes

**ANY QUESTIONS:** Riggs Chief Compliance Officer, Susan Shoemaker. Remains available to address any questions regarding this Part 2A, including the disclosure additions and enhancements below.

Riggs has updated this Brochure at Item 4 and Item 5 to describe Riggs' relationship with an unaffiliated sub-advisor, First Trust Direct Indexing L.P., as well as the fee associated with the sub-advisor's services.

Item 3 Table of Contents

Item 1	Cover Page .....	1
Item 2	Material Changes.....	2
Item 3	Table of Contents .....	3
Item 4	Advisory Business .....	4
Item 5	Fees and Compensation.....	9
Item 6	Performance-Based Fees and Side-By-Side Management.....	12
Item 7	Types of Clients .....	13
Item 8	Methods of Analysis, Investment Strategies and Risk of Loss .....	14
Item 9	Disciplinary Information.....	16
Item 10	Other Financial Industry Activities and Affiliations .....	17
Item 11	Code of Ethics, Participation or Interest in Client Transactions and Personal Trading .....	18
Item 12	Brokerage Practices .....	19
Item 13	Review of Accounts .....	22
Item 14	Client Referrals and Other Compensation .....	23
Item 15	Custody .....	24
Item 16	Investment Discretion.....	25
Item 17	Voting Client Securities.....	26
Item 18	Financial Information .....	27

#### Item 4 Advisory Business

- A. Riggs Asset Management Company, Inc. (“Riggs”) is a corporation formed on November 27, 1990 in the Commonwealth of Pennsylvania. Riggs became registered as an Investment Adviser Firm in January 1991. Riggs is principally owned by Robert H. Graham and Elizabeth B. Graham. Robert J. Graham is Riggs’ Founder.
- B. As discussed below, Riggs offers to its clients (individuals, business entities, pension and profit sharing plans, trusts, estates and charitable organizations, etc.) investment management services, and, to the extent specifically requested by the client, limited consultation services to its investment management clients on investment and non- investment related matters (**See** Limitations below). Any such consultation services, to the extent rendered, shall be rendered exclusively on an unsolicited basis. Riggs has a family office function for high net worth individuals and families. Riggs provides bill paying, bookkeeping and record keeping, assistance with budgeting and cash flow management. Pricing is on an individualized basis and is directly correlated to the service need of the client.
- C. Riggs shall provide investment advisory services specific to needs of each client. Prior to providing investment advisory services, an investment adviser representative will ascertain each client’s investment objective(s). Thereafter, Riggs shall allocate and/or recommend that the client allocate investment assets consistent with the designated investment objective(s). The client may, at any time, impose reasonable restrictions, in writing, on Riggs’ services.
- D. Riggs does not participate in a wrap fee program.
- E. Riggs may engage an unaffiliated sub-advisor, First Trust Direct Indexing L.P., to provide sub-advisory and investment management services for clients. Please see Item 5 below for additional details regarding this relationship.
- F. As of December 31, 2023, Riggs had \$440.2 Million in assets under management on a discretionary basis and \$8.6 Million in assets under management on a non-discretionary basis or a total of approximately \$448.8 Million in assets under management.

#### MISCELLANEOUS

**Limitations Consulting/Implementation Services:** Riggs does not hold itself out as a financial planner, nor does it provide comprehensive financial planning services. To the extent specifically requested by a client (and depending on the nature of the issue presented), Riggs may provide limited financial planning and related consulting services regarding non-investment related matters, such as estate planning, tax planning, insurance, etc. Riggs does not serve as an attorney, accountant, or insurance agency, and no portion of our services

should be construed as same. Accordingly, Riggs does not prepare estate planning documents, tax returns or sell insurance products. To the extent requested by a client, we may recommend the services of other professionals for certain non-investment implementation purpose (i.e. attorneys, accountants, insurance, etc.). You are under no obligation to engage the services of any such recommended professional. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation that we make.

**Please Note:** If the client engages any unaffiliated recommended professional, and a dispute arises thereafter relative to such engagement, the client agrees to seek recourse exclusively from and against the engaged professional. At all times, the engaged licensed professional[s] (i.e. attorney, accountant, insurance agent, etc.), and **not** Riggs, shall be responsible for the quality and competency of the services provided. **Please Also Note:** It remains the client's responsibility to promptly notify Riggs if there is ever any change in the client's financial situation or investment objectives for the purpose of reviewing, evaluating, or revising Riggs' previous recommendation and/or services.

**Retirement Plan Rollovers Potential for Conflict of Interest:** A client or prospective client leaving an employer typically has four options regarding an existing retirement plan (and may engage in a combination of these options): (i) leave the money in the former employer's plan, if permitted, (ii) roll over the assets to the new employer's plan, if one is available and rollovers are permitted, (iii) roll over to an Individual Retirement Account ("IRA"), or (iv) cash out the account value (which could, depending upon the client's age, result in adverse tax consequences). If Riggs recommends that a client roll over their retirement plan assets into an account to be managed by Riggs, such a recommendation creates a conflict of interest if Riggs will earn new (or increase its current) compensation as a result of the rollover. If Riggs provides a recommendation as to whether a client should engage in a rollover or not (whether it is from an employer's plan or an existing IRA), Riggs is acting as a fiduciary within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. **No client is under any obligation to roll over retirement plan assets to an account managed by Riggs, whether it is from an employer's plan or an existing IRA. Riggs' Chief Compliance Officer, Susan Shoemaker, remains available to address any questions that a client or prospective client may have regarding the potential for conflict of interest presented by such rollover recommendation.**

**ERISA / IRC Fiduciary Acknowledgment:** If the client is: (i) a retirement plan ("Plan") organized under ERISA; (ii) a participant or beneficiary of a Plan subject to Title I of ERISA or described in section 4975(e)(1)(A) of the Internal Revenue Code, with authority to direct the investment of assets in his or her Plan account or to take a distribution; (iii) the beneficial owner of an IRA acting on behalf of the IRA; or (iv) a Retail Fiduciary with respect to a plan subject to Title I of ERISA or described in section 4975(e)(1)(A) of the Internal Revenue Code: then Riggs represents that it and its representatives are fiduciaries under ERISA or the Internal Revenue Code, or both, with respect to any investment advice provided by Riggs or its representatives or with respect to any investment recommendations regarding an ERISA Plan or participant or beneficiary account.

**Tradeaway/Prime Broker Fees:** As discussed below at Item 5, relative to its discretionary investment management services, when beneficial to the client, individual fixed income transactions may be often be effected through broker-dealers other than the account custodian, in which event, the client generally will incur the fee (commission, mark-up/mark-down) charged by the executing broker-dealer and, potentially, a separate “tradeaway” and/or prime broker fee charged by the account custodian (generally Schwab).

**Cash Positions:** Riggs continues to treat cash as an asset class. As such, unless determined to the contrary by Riggs, all cash positions (money markets, etc.) shall continue to be included as part of assets under management for purposes of calculating Riggs’ advisory fee. At any specific point in time, depending upon perceived or anticipated market conditions/events (there being **no guarantee** that such anticipated market conditions/events will occur), Riggs may maintain cash positions for defensive purposes. In addition, while assets are maintained in cash, such amounts could miss market advances. Depending upon current yields, at any point in time, Riggs’ advisory fee could exceed the interest paid by the client’s money market fund. **ANY QUESTIONS: Riggs’ Chief Compliance Officer, Susan Shoemaker, remains available to address any questions that a client or prospective may have regarding the above fee billing practices.**

**Portfolio Activity:** Riggs has a fiduciary duty to provide services consistent with the client’s best interest. As part of its investment advisory services, Riggs will review client portfolios on an ongoing basis to determine if any changes are necessary based upon various factors, including, but not limited to, investment performance, market conditions, fund manager tenure, style drift, account additions/withdrawals, and/or a change in the client’s investment objective. Based upon these factors, there may be extended periods of time when Riggs determines that changes to a client’s portfolio are neither necessary nor prudent. Clients remain subject to the fees described in Item 5 below during periods of account inactivity. Of course, as indicated below, there can be no assurance that investment decisions made by Riggs will be profitable or equal any specific performance level(s).

**Custodian Charges-Additional Fees:** As discussed below at Item 12 below, when requested to recommend a broker-dealer/custodian for client accounts, Riggs generally recommends that *Schwab* serve as the broker-dealer/custodian for client investment management assets. Broker-dealers such as *Schwab* charge brokerage commissions, transaction, and/or other type fees for effecting certain types of securities transactions (i.e., including transaction fees for certain mutual funds, and mark-ups and mark-downs charged for fixed income transactions, etc.). The types of securities for which transaction fees, commissions, and/or other type fees (as well as the amount of those fees) shall differ depending upon the broker-dealer/custodian (while certain custodians, including *Schwab*, generally do not currently charge fees on individual equity transactions (including ETFs), others do. **Please Note:** there can be no assurance that *Schwab* will not change their transaction fee pricing in the future). When beneficial to the client, individual fixed-income and/or equity transactions may be effected through broker-dealers with whom Riggs and/or the client have entered into arrangements for prime brokerage clearing services, including effecting certain client transactions through other SEC registered and FINRA member broker-dealers (in which event, the client generally will incur both the transaction fee charged by the executing broker-dealer and a “trade-away” fee charged by *Schwab*). These fees/charges are in addition to Riggs’ investment advisory fee at Item 5 below.

Riggs does not receive any portion of these fees/charges. **ANY QUESTIONS: Riggs' Chief Compliance Officer, Susan Shoemaker, remains available to address any questions that a client or prospective client may have regarding the above.**

**Please Note-Use of Mutual and Exchange Traded Funds:** Riggs utilizes mutual funds and exchange traded funds for its client portfolios. In addition to Riggs' investment advisory fee described below, and transaction and/or custodial fees discussed above, 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).

**Trustee Directed Plans:** Riggs may be engaged to provide discretionary investment advisory services to ERISA retirement plans, whereby the Firm shall manage Plan assets consistent with the investment objective designated by the Plan trustees. In such engagements, Riggs will serve as an investment fiduciary as that term is defined under The Employee Retirement Income Security Act of 1974 ("ERISA"). Riggs will generally provide services on an "assets under management" fee basis per the terms and conditions of an *Investment Advisory Agreement* with the Plan.

**Client Obligations:** In performing our services, Riggs shall not be required to verify any information received from the client or from the client's other professionals, and is expressly authorized to rely thereon. Moreover, each client is advised that it remains the client's responsibility to promptly notify us if there is ever any change in the client's financial situation or investment objectives for the purpose of reviewing, evaluating, or revising our previous recommendations and/or services.

**Investment Risk:** 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 (including the investments and/or investment strategies recommended or undertaken by Riggs) will be profitable or equal any specific performance level(s).

**Disclosure Brochure:** A copy of Riggs' written Brochure as set forth on Part 2 of Form ADV shall be provided to each client prior to, or contemporaneously with, the execution of the *Investment Advisory Agreement*.

**Borrowing Against Assets/Risks.** A client who has a need to borrow money could determine to do so by using:

- **Margin-**The account custodian or broker-dealer lends money to the client. The custodian charges the client interest for the right to borrow money, and uses the assets in the client's brokerage account as collateral; and,
- **Pledged Assets Loan-** In consideration for a lender (i.e., a bank, etc.) to make a loan to the client, the client pledges its investment assets held at the account custodian as collateral;

These above-described collateralized loans are generally utilized because they typically provide more favorable interest rates than standard commercial loans. These types of collateralized loans can assist with a pending home purchase, permit the retirement of more expensive debt, or enable borrowing in lieu of liquidating existing account positions and incurring capital gains taxes. However, such loans are not without potential material risk to the client's investment assets. The lender (i.e. custodian, bank, etc.) will have recourse against the client's investment assets in the event of loan default or if the assets fall below a certain level. For this reason, Riggs does not recommend such borrowing unless it is for specific short-term purposes (i.e. a bridge loan to purchase a new residence). Riggs does not recommend such borrowing for investment purposes (i.e. to invest borrowed funds in the market). Regardless, if the client was to determine to utilize margin or a pledged assets loan, the following economic benefits would inure to Riggs:

- by taking the loan rather than liquidating assets in the client's account, Riggs continues to earn a fee on such Account assets; and,
- if the client invests any portion of the loan proceeds in an account to be managed by Riggs, Riggs will receive an advisory fee on the invested amount; and,
- if Riggs' advisory fee is based upon the higher margined account value (***see*** margin disclosure at Item 5 below), Riggs will earn a correspondingly higher advisory fee. This could provide Riggs with a disincentive to encourage the client to discontinue the use of margin.

**Please Note:** The Client must accept the above risks and potential corresponding consequences associated with the use of margin or a pledged assets loan.



## Item 5 Fees and Compensation

- A. The client can determine to engage Riggs to provide discretionary investment advisory services on a *fee-only* basis.

### **INVESTMENT MANAGEMENT SERVICES**

In the event the client determines to engage Riggs to provide discretionary management services on a *fee-only* basis, Riggs shall charge an annual investment management fee based upon a percentage of the market value of the assets being managed by Riggs as follows:

ASSETS	ANNUAL FEE
First \$5,000,000	1.0%
Next \$5,000,000	0.85%
Next \$5,000,000	0.75%

Above \$15,000,000 fee is negotiable:

Riggs' annual investment advisory fee shall include investment advisory services, and, to the extent specifically requested by the client, limited consultation services to its investment management clients on investment and non-investment related matters. Any such consultation services, to the extent rendered, shall be rendered exclusively on an unsolicited basis.

Riggs may engage an unaffiliated sub-advisor to provide sub-advisory and investment management services for client investment assets. Riggs is not affiliated with First Trust Direct Indexing L.P., a registered investment advisor with the U.S. Securities and Exchange Commission. As a part of Riggs' engagement of First Trust Direct Indexing L.P. as a sub advisor, the client will bear a new or additional annual fee rate of 0.30% of the account value per year with a minimum fee of \$1,500 per account per year which is billed directly to client accounts as a part of an increased Riggs bundled fee. Such rate may be in addition to Riggs' base fee rate. This additional or bundled fee rate is set forth in client's agreement.

Riggs may also render investment advice through consultations, reviews, or studies not involving investment management services, for which Riggs shall generally bill the client at the hourly rate of \$300.00.

Riggs may offer the services related to running a family office for which it contracts a fixed charge related to the services provided.

**Margin Accounts: Risks/Conflict of Interest.** Riggs **does not** recommend the use of margin for investment purposes. A *margin account* is a brokerage *account* that allows investors to borrow money to buy securities and/or for other non-investment borrowing purposes. The broker/custodian charges the investor interest for the right to borrow money and uses the securities as collateral. By using borrowed funds, the customer is employing leverage that will magnify both account gains and losses. Should a client determine to use margin, Riggs will include the entire market value of the margined assets when computing its advisory fee. Accordingly, Riggs' fee shall be based upon a higher margined account value, resulting in Riggs earning a correspondingly higher advisory fee. As a result, the potential of conflict

of interest arises since Riggs may have an economic disincentive to recommend that the client terminate the use of margin. **Please Note:** The use of margin can cause significant adverse financial consequences in the event of a market correction. **ANY QUESTIONS: Our Chief Compliance Officer, Susan Shoemaker, remains available to address any questions that a client or prospective client may have regarding the use of margin.**

- B. Clients may elect to have Riggs' management fees deducted from their custodial account. Both Riggs' *Investment Advisory Agreement* and the custodial/clearing agreement may authorize the custodian to debit the account for the amount of Riggs' investment management fee and to directly remit that management fee to Riggs in compliance with regulatory procedures. In the limited event that Riggs bills the client directly, payment is due upon receipt of Riggs' invoice. Riggs shall deduct fees and/or bill clients quarterly in advance, based upon the market value of the assets on the last business day of the previous quarter.
- C. When requested to recommend a broker-dealer/custodian for client accounts, Riggs generally recommends that *Schwab* serve as the broker-dealer/custodian for client investment management assets. Broker-dealers such as *Schwab* charge brokerage commissions, transaction, and/or other type fees for effecting certain types of securities transactions (i.e., including transaction fees for certain mutual funds, and mark-ups and mark-downs charged for fixed income transactions, etc.). The types of securities for which transaction fees, commissions, and/or other type fees (as well as the amount of those fees) shall differ depending upon the broker-dealer/custodian (while certain custodians, including *Schwab*, generally do not currently charge fees on individual equity transactions (including ETFs), others do. **Please Note:** there can be no assurance that *Schwab* will not change their transaction fee pricing in the future). When beneficial to the client, individual fixed-income and/or equity transactions may be effected through broker-dealers with whom Riggs and/or the client have entered into arrangements for prime brokerage clearing services, including effecting certain client transactions through other SEC registered and FINRA member broker-dealers (in which event, the client generally will incur both the transaction fee charged by the executing broker-dealer and a "trade-away" fee charged by *Schwab*). These fees/charges are in addition to Riggs' investment advisory fee at Item 5 below. Riggs does not receive any portion of these fees/charges.
- D. Riggs' annual investment advisory fee shall be prorated and paid quarterly, in advance, based upon the market value of the assets on the last business day of the previous quarter. There shall be no fee adjustments for intra-quarter asset additions or withdrawals. Riggs, in its sole discretion, may charge a lesser investment management fee, charge a fixed fee, or charge no fee based upon certain criteria (i.e. anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, grandfathered fee schedules, employee/family accounts, courtesy accounts, competition, negotiations with client, etc.). **Please Note:** As result of the above, similarly situated clients could pay different fees. In addition, similar advisory services may be available from other investment advisers for similar or lower fees. **ANY QUESTIONS:** Riggs' Chief Compliance Officer, Susan Shoemaker, remains available to address any questions that a client or prospective client may have regarding advisory fees.

The *Investment Advisory Agreement* between Riggs and the client will continue in effect until terminated by either party by written notice in accordance with the terms of the *Investment Advisory Agreement*. Upon termination, Riggs shall refund the pro-rated portion of the advanced advisory fee paid based upon the number of days remaining in the billing quarter.

- E. Neither Riggs, nor its representatives accept compensation from the sale of securities or other investment products.

**Please Note-Accrued Interest/Dividends:** The market value reflected on periodic account statements issued by the account custodian may differ from the value used by Riggs for its advisory fee billing process. Riggs includes the accrued value of certain month or quarter-end interest and/or dividend payments when calculating client advisory fees, which amounts may not yet be reflected on the custodian statement as having been received by the account.

**Item 6    Performance-Based Fees and Side-By-Side Management**

Neither Riggs nor any supervised person of Riggs accepts performance-based fees.

## Item 7 Types of Clients

Riggs' clients shall generally include individuals, business entities, pension and profit sharing plans, trusts, estates and charitable organizations. Riggs, in its sole discretion, may charge a lesser investment management fee, charge a fixed fee, or charge no fee based upon certain criteria (i.e. anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, grandfathered fee schedules, employee/family accounts, courtesy accounts, competition, negotiations with client, etc.). **Please Note:** As result of the above, similarly situated clients could pay different fees. In addition, similar advisory services may be available from other investment advisers for similar or lower fees. **ANY QUESTIONS:** Riggs' Chief Compliance Officer, Susan Shoemaker, remains available to address any questions that a client or prospective client may have regarding advisory fees.

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

A. Riggs may utilize the following methods of security analysis:

- Charting - (analysis performed using patterns to identify current trends and trend reversals to forecast the direction of prices)
- 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)

Riggs 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)

**Please Note: Investment Risk:** 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 (including the investments and/or investment strategies recommended or undertaken by Riggs) will be profitable or equal any specific performance level(s).

B. Riggs' 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 Riggs must have access to current/new market information. Riggs has no control over the dissemination rate of market information; therefore, unbeknownst to Riggs, certain analyses may be compiled with outdated market information, severely limiting the value of Riggs' 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.

Riggs' 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 requires 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 than a longer term investment strategy.

- C. Currently, Riggs primarily allocates investment management assets of its client accounts among individual equity and debt securities, exchange traded funds and various no-load mutual fund classes, on a discretionary basis, in accordance with the investment objectives of the client.
- D. **Cryptocurrency:** For clients who want exposure to cryptocurrencies, including Bitcoin, the Registrant will consider investment in corresponding exchange traded securities, or an allocation to separate account managers and/or private funds that provide cryptocurrency exposure. Crypto is a digital currency that can be used to buy goods and services, but uses an online ledger with strong cryptography (i.e., a method of protecting information and communications with codes) to secure online transactions. Unlike conventional currencies issued by a monetary authority, cryptocurrencies are generally not controlled or regulated and their price is determined by the supply and demand of their market. Cryptocurrency is currently considered to be a speculative investment. The speculative nature of cryptocurrencies notwithstanding, the Registrant may (but is not obligated to) utilize crypto exposure in one or more of its asset allocation strategies for diversification purposes. **Please Note:** Investment in cryptocurrencies is subject to the potential for **liquidity constraints, extreme price volatility and complete loss of principal.** **Notice to Opt Out.** Clients can notify the Registrant, **in writing**, to exclude cryptocurrency exposure from their accounts. Absent the Registrant's receipt of such written notice from the client, The Registrant may (but is not obligated to) utilize cryptocurrency as part of its asset allocation strategies for client accounts.

Item 9    Disciplinary Information

Riggs has not been the subject of any disciplinary actions.



Item 10 Other Financial Industry Activities and Affiliations

- A. Neither Riggs, nor its representatives, are registered or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.
- B. Neither Riggs, nor its representatives, are registered or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or a representative of the foregoing.
- C. Riggs has no other relationship or arrangement with a related person that is material to its advisory business.
- D. Riggs does not receive, directly or indirectly, compensation from investment advisors that it recommends or selects for its clients.

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

- A. Riggs maintains an investment policy relative to personal securities transactions. This investment policy is part of Riggs' overall Code of Ethics, which serves to establish a standard of business conduct for all of Riggs' Representatives that is based upon fundamental principles of openness, integrity, honesty and trust, a copy of which is available upon request.

In accordance with Section 204A of the Investment Advisers Act of 1940, Riggs also maintains and enforces written policies reasonably designed to prevent the misuse of material non-public information by Riggs or any person associated with Riggs.

- B. Neither Riggs nor any related person of Riggs recommends, buys, or sells for clients' accounts, securities in which Riggs or any related person of Riggs has a material financial interest.
- C. Riggs and/or representatives of Riggs can buy or sell securities that are also recommended to clients. This practice may create a situation where Riggs and/or representatives of Riggs are in a position to materially benefit from the sale or purchase of those securities. Therefore, this situation creates a potential conflict of interest. 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 Riggs did not have adequate policies in place to detect such activities. In addition, this requirement can help detect insider trading, "front-running" (i.e., personal trades executed prior to those of Riggs' clients) and other potentially abusive practices.

Riggs has a personal securities transaction policy in place to monitor the personal securities transactions and securities holdings of each of Riggs' "Access Persons." Riggs' securities transaction policy requires that an Access Person of Riggs must provide the Chief Compliance Officer or his/her 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/her designee with a written report of the Access Person's current securities holdings at least once each twelve (12) month period thereafter on a date Riggs selects; provided, however that at any time that Riggs has only one Access Person, he or she shall not be required to submit any securities report described above.

- D. Riggs and/or representatives of Riggs can buy or sell securities, at or around the same time as those securities are recommended to clients. This practice creates a situation where Riggs and/or representatives of Riggs are in a position to materially benefit from the sale or purchase of those securities. Therefore, this situation creates a potential conflict of interest. As indicated above in Item 11 C, Riggs has a personal securities transaction policy in place to monitor the personal securities transaction and securities holdings of each of Riggs' Access Persons.

## Item 12 Brokerage Practices

- A. In the event that the client requests that Riggs recommend a broker-dealer/custodian for execution and/or custodial services (exclusive of those clients that may direct Riggs to use a specific broker-dealer/custodian), Riggs generally recommends that investment management accounts be maintained at *Schwab*. Prior to engaging Riggs to provide investment management services, the client will be required to enter into a formal *Investment Advisory Agreement* with Riggs setting forth the terms and conditions under which Riggs shall manage the client's assets, and a separate custodial/clearing agreement with each designated broker-dealer/custodian.

Factors that Riggs considers in recommending *Schwab* (or any other broker-dealer/custodian to clients) include historical relationship with Riggs, financial strength, reputation, execution capabilities, pricing, research, and service. Although *Schwab* has eliminated trade commissions for most equity and ETF transactions some fees still remain for certain types of transactions. Those fees paid by Riggs' clients shall comply with Riggs' duty to obtain best execution, a client may pay a commission/transaction fee that is higher than another qualified broker-dealer might charge to effect the same transaction where Riggs 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 a broker-dealer service, including the value of research provided, execution capability, commission rates, and responsiveness. Accordingly, although Riggs will seek competitive rates, it may not necessarily obtain the lowest possible commission/transaction 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, Riggs' investment management fee.

### Schwab Advisor Services Program

Riggs participates in the *Schwab Advisor Services* program. *Schwab Advisor Services* is a division of *Charles Schwab & Company, Inc.*, a FINRA registered broker-dealer, member SIPC. Riggs may recommend that clients establish brokerage accounts with Schwab Advisor Services to maintain custody of clients' assets and to effect trades for their accounts. Although Riggs may recommend that clients establish accounts at Schwab, it is the client's decision to custody assets with Schwab. Riggs is independently owned and operated and not affiliated with Schwab. Riggs receives some benefits from Schwab through its participation in the program. **Please see** disclosure below.

**Non-Soft Dollar Benefits:** Although not a material consideration when determining whether to recommend that a client utilize the services of a particular broker-dealer/custodian, Riggs can receive from Schwab (or another broker-dealer/custodian, platform sponsor, fund sponsor, or vendor) without cost (and/or at a discount) support services and/or products, certain of which assist Riggs to better monitor and service client accounts maintained at such institutions. Included within the support services that can be obtained by Riggs can 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-including client events, computer hardware and/or software and/or other products used by Riggs in furtherance of its investment advisory business operations.

Riggs' clients do not pay more for investment transactions effected and/or assets maintained at Schwab as the result of this arrangement. There is no corresponding commitment made by Riggs to Schwab, 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.

Riggs determines, in good faith, that any applicable fee charged by the custodian is reasonable in relation to the value of the brokerage and research services received. The fees charged by the broker-dealer/custodian are exclusive of, and in addition to, Riggs' investment management fee.

**ANY QUESTIONS: Riggs' Chief Compliance Officer, Susan Shoemaker, remains available to address any questions that a client or prospective client may have regarding the above arrangements and the corresponding conflict of interest presented by such arrangements.**

1. Riggs does not receive referrals from broker-dealers.
2. **Directed Brokerage:** Riggs recommends that its clients utilize the brokerage and custodial services provided by Schwab. Riggs 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 Riggs 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 Riggs. As a result, a client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case. **Please Note:** In the event that the client directs Riggs 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 Riggs. Higher transaction costs adversely impact account performance. **Please Also**

**Note:** Transactions for directed accounts will generally be executed following the execution of portfolio transactions for non-directed accounts.

- B. **Order Aggregation:** Transactions for each client account generally will be effected independently. To the extent applicable relative to exchange listed equity purchases, Riggs may determine to purchase or sell the same securities for several clients at approximately the same time. In such situations, Riggs may (but is not obligated to) combine or “bunch” such orders when it believes that it might result in obtaining better price execution.

Item 13 Review of Accounts

- A. For those clients to whom Riggs provides investment supervisory services, account reviews are conducted on an ongoing basis by Riggs' Principal, Robert H. Graham and/or representatives, Alan J Corey Glassman, Robert J. Graham, Elizabeth Graham, Susan A. Shoemaker and Robert Graham. All investment supervisory clients are advised that it remains their responsibility to advise Riggs of any changes in their investment objectives and/or financial situation. All clients (in person or via telephone) are encouraged to comprehensively review investment objectives and account performance with Riggs on an annual basis.
- B. Riggs can conduct account reviews on an other than periodic basis upon the occurrence of a triggering event, such as a change in client investment objectives and/or financial situation, market corrections and client request.
- C. Clients are provided with transaction confirmation notices and regular summary account statements directly from the broker-dealer/custodian for the client accounts. Those clients to whom Riggs provides investment supervisory services will also receive from Riggs a quarterly report summarizing account activity and performance.

#### Item 14 Client Referrals and Other Compensation

As indicated at Item 12 above, Riggs can receive from Schwab (and others) without cost (and/or at a discount), support services and/or products. Riggs' clients do not pay more for investment transactions effected and/or assets maintained at Schwab (or any other institution) as result of this arrangement. There is no corresponding commitment made by Riggs to Schwab, or to any other entity, to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as the result of the above arrangement. **ANY QUESTIONS: Riggs' Chief Compliance Officer, Susan Shoemaker, remains available to address any questions that a client or prospective client may have regarding the above arrangements and the corresponding conflicts of interest presented by such arrangement.**

Riggs does not maintain active solicitor/promoter arrangements for client introductions. However, Riggs continues to compensate legacy solicitors for prior introductions.

## Item 15 Custody

Riggs shall have the ability to deduct its advisory fee from the client's custodial account. Clients are provided with written transaction confirmation notices, and a written summary account statement directly from the custodian (i.e., *Schwab*, etc.) at least quarterly. **Please Note:** To the extent that Riggs provides clients with periodic account statements or reports, the client is urged to compare any statement or report provided by Riggs with the account statements received from the account custodian. **Please Also Note:** The account custodian does not verify the accuracy of Riggs' advisory fee calculation.

Certain clients have established asset transfer authorizations that permit the qualified custodian to rely upon instructions from Riggs to transfer client funds or securities to third parties. These arrangements are disclosed at Item 9 of Part 1 of Form ADV. However, in accordance with the guidance provided in the SEC's February 21, 2017 *Investment Adviser Association* No-Action Letter, the affected accounts are not subject to an annual surprise CPA examination.

In addition, Riggs and/or certain of its members engage in other services and/or practices (i.e., bill paying, trustee service, etc.) requiring disclosure at Item 9 of Part 1 of Form ADV. These services and practices result in Riggs having custody under Rule 206(4)-2 of the Advisers Act. Per the Rule, having such custody requires Riggs to undergo an annual surprise CPA examination, and make a corresponding Form ADV-E filing with the SEC, for as long as Riggs provides such services and/or engages in such practices.

**ANY QUESTIONS: Riggs' Chief Compliance Officer, Susan Shoemaker, remains available to address any questions that a client or prospective client may have regarding custody-related issues.**



## Item 16 Investment Discretion

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

Clients who engage Riggs on a discretionary basis may, at any time, impose restrictions, **in writing**, on Riggs' 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 or proscribe Riggs' use of margin, etc.).

Item 17 Voting Client Securities

- A. Riggs does not vote client proxies. Clients maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets.
- B. Clients will receive their proxies or other solicitations directly from their custodian. Clients may contact Riggs to discuss any questions they may have with a particular solicitation.

Item 18 Financial Information

- A. Riggs does not solicit fees of more than \$1,200, per client, six months or more in advance.
- B. Riggs is unaware 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.
- C. Riggs has not been the subject of a bankruptcy petition.

***Any questions: Riggs' Chief Compliance Officer, Susan A. Shoemaker, remains available to address any questions that a client or prospective client may have regarding the above disclosures and arrangements.***