

# RDG

## Capital Management

### Form ADV Part 3 Client Relationship Summary January 22, 2024

RDG Capital Management, LLC is registered with the Securities and Exchange Commission as an Investment Advisor. Investment advisors and brokers provide different services and fee schedules, and it is important for investors to understand the differences. Free and simple tools are available to research firms and financial professionals at <https://www.investor.gov/crs>, which also provides educational materials about broker-dealers and investment advisors, as well as general information on investing.

#### What investment services and advice can you provide me?

RDGCM offers investment advisory services for individual, corporate, and institutional investors. Our core business is the discretionary management of investment portfolios. However, when discussing appropriate investment solutions with clients, financial planning issues often arise, and we will offer guidance on such issues as part of our wealth management offering.

RDGCM works with clients to set up investment solutions and provide on-going portfolio management services. We start by meeting to discuss our philosophy and to gather information about each client's personal and financial circumstances. Later, we propose an appropriate investment plan, based upon the client's unique risk tolerance and return objectives. This plan lays out our recommended asset mix among stocks, bonds, cash, and alternative investments. We try to maintain this asset mix through time, rebalancing to meet asset allocation targets as taxes and other constraints allow.

Each portfolio is customized to each individual client's goals and needs. Clients' tax circumstances and other personal preferences are factored into how a portfolio is constructed.

- *Monitoring:* Accounts are monitored on an ongoing basis as part of our standard services.
- *Investment Authority:* Clients sign an investment management agreement (IMA) at the inception of our relationship that gives RDGCM investment discretion on client accounts and to allow RDGCM to retain a sub-advisor to perform investment management and related administrative services. RDGCM uses Armbruster Capital Management, Inc as the sub advisor on client accounts. The IMA also specifies a target asset allocation and notes any limitations on our authority to manage the portfolio.
- *Limited Investment Offerings:* RDGCM offers advice on all types of investment offerings.
- *Account Minimums:* RDGCM typically requires a minimum of \$1 million of assets under management to establish a new relationship with a client. This will be reviewed on an individual basis and family relationships are considered.

For more detailed information about our services please refer to our [Form ADV Part 2 Brochure](#), particularly items 4 and 7.

#### Questions to Ask:

- Given my financial situation, should I choose an investment advisory service? Why or why not?
- How will you choose investments to recommend to me?
- What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?

#### What fees will I pay?

*Principal Fees and Costs:* RDGCM is compensated solely based on fees for its services. Our regular fee schedule is:

- Assets under management are billed at 0.85% annually.

All accounts within a single immediate family relationship are grouped when calculating fees. Fixed fees may be used depending on individual circumstances. Fees may be negotiable in some cases.

Fees are generally deducted directly from client accounts. Accounts are billed monthly in arrears.

*Other Fees and Costs:* In addition to our fees, there are other costs implicit in the investment process. These include mutual fund expense ratios, alternative investment purchasing and custody fees, and trading commissions paid to the custodial firm. These fees do not accrue to RDGCM but compensate the custodial firm and mutual funds for their services.

*You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.*

Please refer to our [Form ADV Part 2 Brochure](#), particularly item 5 about our fees and investment costs.

**Question to Ask:**

- Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?

**What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?**

*When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means.*

Examples of ways we make money and conflicts of interest:

- The more assets there are in your advisory account, the more you will pay in fees, and thus there is an incentive to encourage you to increase the assets in your account.
- Because stocks grow faster than bonds on average over time, we may be incentivized to encourage you to put more money into stocks.

For other potential conflicts of interest, refer to our [Form ADV Part 2 Brochure](#), particularly items 10, 11 and 12.

**Question to Ask:**

- How might your conflicts of interest affect me, and how will you address them?

**How do your financial professionals make money?**

RDGCM employees are paid a salary. In addition, employees may receive additional compensation or bonuses based on individual performance and the success of the firm, or client assets they service.

**Do you or your financial professionals have legal or disciplinary history?**

No. Visit <https://www.investor.gov/crs> for a free and simple search tool to research our financial professionals.

**Question to Ask:**

- As a financial professional, do you have any disciplinary history? For what type of conduct?

**Additional Information**

For additional information about our investment advisory services please review our [Form ADV Part 2 Brochure](#), call us, or visit our website at <https://www.rdgcapitalmanagement.com> to request a copy of the most up to date version of this relationship summary please call 585-673-2690

**Question to Ask:**

- Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?