

Item 1 – Cover Page



Form ADV Part II Brochure March 30, 2024

Rydar Equities, Inc.

24 Smith Rd, STE 302 Midland, TX 79705

432-634-8673

This Brochure provides information about the qualifications and business practices of Rydar Equities. If you have any questions about the contents of this Brochure, please contact us at 432-634-8673. Currently, our Brochure may be requested free of charge by contacting Ryan Peckham at 432-634-8673 or rpeckham@rydarequities.com

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.

Rydar Equities, Inc. is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser. Additional information about Rydar Equities is also available on the SEC's website at www.adviserinfo.sec.gov.

CRD # 154086

Item 2 – Material Changes

Registering with the SEC for the first time.

Added a second office location at 134 Saint Andrews Lane Aledo, TX 76008. We are buying an office building to have as our new location but I am currently storing some client files here until it is ready. This is a personal residence.

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Item 4 – Advisory Business

Rydar Equities, Inc. is an S-Corporation established in the State of Texas on 07/22/2019. Ryan Peckham is the acting President and has been providing advisory services since December 1, 2005.

As of April 22, 2023, Rydar Equities, Inc. managed \$112,000,000.00 on a discretionary basis and \$ 0.00 on a nondiscretionary basis.

Item 5 – Fees and Compensation

The fee schedule applicable as of this Brochure is as follows:

| Client Assets | Annual Fee (%) for all assets |
|---|--------------------------------------|
| On the first \$1,000,000.00 | 1.0 % |
| On the next \$1,500,000.00 | 0.8 % |
| On the next \$2,500,000.00 | 0.75 % |
| On the next \$10,000,000.00 | 0.50% |
| On all amounts in excess of \$15,000,000.00 | 0.4 % |

All fees are subject to negotiation and at the discretion of the advisor as long as decided and changes made to the contract in writing and fees are strictly charged at the end of the quarter after services have been rendered. No compensation is ever collected up front. The specific and default manner in which fees are charged by Rydar Equities is established in a client's written agreement with Rydar Equities.

Clients may elect to be billed directly for fees or to authorize Rydar Equities to directly debit fees from client accounts. Management fees shall not be prorated for each capital contribution and withdrawal made during the applicable calendar quarter. Accounts initiated or terminated during a calendar quarter will be charged a prorated fee. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable. The client has the right to terminate an agreement without penalty within five business days after entering into the agreement.

Rydar Equities, Inc. fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, third party investment and other third parties such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to Rydar Equities, Inc. fee, and Rydar Equities, Inc. shall not receive any portion of these commissions, fees, and costs.

In some cases, Rydar Equities, Inc. may provide life, disability or long term care insurance services to clients and in doing so will be compensated with a commission from the insurer.

Item 12 further describes the factors that Rydar Equities, Inc. considers in selecting or recommending broker-dealers for *client* transactions and determining the reasonableness of their compensation (*e.g.*, commissions).

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

Rydar Equities, Inc. does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

Item 7 – Types of Clients

Rydar Equities, Inc. provides portfolio management services to individuals and high net worth individuals. Rydar Equities, Inc. generally requires a minimum account of \$ 100,000.00.

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

Investing in securities involves risk of loss that clients should be prepared to bear. Rydar Equities, Inc. does all the research it can to provide the best recommendations possible. Primarily, Rydar Equities, Inc. researches company fundamentals to make recommendations. This type of research includes looking at a company's financials to see and monitor if they company is in good financial shape. Another method we employ is looking at the technical indicators of market. Looking to see where the trends are and where they could be headed. It is important to state again that no amount of research can prevent from market up and downs and there is always a chance of loss investing in the stock market.

Item 9 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Rydar Equities, Inc. or the integrity of Rydar Equities, Inc. management. Rydar Equities, Inc. has no information applicable to this Item.

Item 10 – Other Financial Industry Activities and Affiliations

NONE

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

Rydar Equities, Inc. has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at Rydar Equities must acknowledge the terms of the Code of Ethics annually, or as amended.

Rydar Equities, Inc. anticipates that, in appropriate circumstances, consistent with clients' investment objectives, it will cause accounts over which Rydar Equities, Inc. has management authority to effect, and will recommend to investment advisory clients or prospective clients, the purchase or sale of securities in which Rydar Equities, Inc., its affiliates and/or clients, directly or indirectly, have a position of interest. Rydar Equities, Inc. employees and persons associated with Rydar Equities, Inc. are required to follow Rydar Equities, Inc. Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors and employees of Rydar Equities, Inc. and its affiliates may trade for their own accounts in securities which are recommended to and/or purchased for Rydar Equities, Inc. clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of Rydar Equities, Inc. will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code certain classes of securities have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of Rydar Equities, Inc. clients. In addition, the Code requires pre-clearance of many transactions, and restricts trading in close proximity to client trading activity. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics, and to reasonably prevent conflicts of interest between Rydar Equities, Inc. and its clients. Rydar Equities, Inc. clients or prospective clients may request a copy of the firm's Code of Ethics by contacting Ryan Peckham.

It is Rydar Equities, Inc. policy that the firm will not affect any principal or agency cross securities transactions for client accounts. Rydar Equities, Inc. will also not cross trades between client accounts. Principal transactions are generally defined as transactions where an adviser, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to any advisory client. A principal transaction may also be deemed to have occurred if a security is crossed between an affiliated hedge fund and another client account. An agency cross transaction is defined as a transaction where a person acts as an investment adviser in relation to a transaction in which the investment adviser, or any person controlled by or under common control with the investment adviser, acts as broker for both the advisory client and for another person on the other side of the transaction. Agency cross-transactions may arise where an adviser is dually registered as a broker-dealer or has an affiliated broker-dealer.

Item 12 – Brokerage Practices

Clients are free to choose any brokerage firm they are comfortable with. Rydar Equities, Inc. does not receive any compensation for recommending a particular firm.

Item 13 – Review of Accounts

Reviews are conducted quarterly. There will be one or two reviewers including G. Ryan Peckham or Cameron Rompal. In the review, we will go over the previous quarter's performance and discuss any changes that need to be made. Changes could consist of changes in risk tolerance, and overall investment strategy because of a life change (ie. Divorce, birth of child). Reviews may be held more often at the request of the client.

Item 14 – Client Referrals and Other Compensation

No other compensation is received other than that listed under Item 5.

Item 15 – Custody

Clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. Rydar Equities, Inc. urges you to carefully review such statements and compare such official custodial records to the account statements that we may provide to you. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Item 16 – Investment Discretion

Rydar Equities, Inc. usually receives discretionary authority from the client at the outset of an advisory relationship to select the identity and amount of securities to be bought and sold. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account. When selecting securities and determining amounts, Rydar Equities, Inc. observes the investment policies, limitations and restrictions of the clients for which it advises. For registered investment companies, Rydar Equities, Inc. authority to trade securities may also be limited by certain federal securities and tax laws that require diversification of investments and favor the holding of investments once made.

Investment guidelines and restrictions must be provided to Rydar Equities, Inc. in writing.

Item 17 – Voting Client Securities

As a matter of firm policy and practice, Rydar Equities, Inc. does not have any authority to and does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. Rydar Equities, Inc. may provide advice to clients regarding the clients' voting of proxies.

Item 18 – Financial Information

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about an adviser's financial condition. Rydar Equities has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients and has not been the subject of a bankruptcy proceeding.

Item 19 – Requirements for State-Registered Advisers

Principal Officer Education Background:

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|--------------------------|----------------------------------|--|------|
| Gary Ryan Peckham | 05/04/1981 | | |
| B.S Engineering | Texas A&M University | | 2002 |
| MBA in Finance | University of Texas – Dallas | | 2007 |
| Doctor of Business Admin | University of Liverpool, England | | 2018 |
| Exams Passed: | Series 7, 66 | | 2005 |

Outside Business Activities

08/2024 - Currently

Texas Christian University –Professor of Practice – Work with TCU teaching courses in Finance, Investment Management, and Economics. 10 hours a week.

Investment Advisor Representative Background:

| | | | |
|------------------------|----------------------------|--|------|
| Cameron Michael Rompal | 04/02/1998 | | |
| B.B.A Finance | Texas Christian University | | 2022 |
| Exams Passed: | SEI, Series 65 Examination | | 2022 |