

# Form ADV Part 2A Brochure

## OneDigital Asset Management LLC

11101 Switzer Road, Suite 200  
Overland Park, KS 66210  
877-742-2021

March 29, 2024

This Brochure provides information about the qualifications and business practices of OneDigital Asset Management LLC (“OneDigital Asset Management”). If you have any questions about the contents of this Brochure, please contact us at 877-742-2021. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or any state securities authority.

OneDigital Asset Management is a “related adviser” under Rule 203A-2(b) of the Investment Advisers Act in that it is under common control with, and shares the same headquarters as, Resources Investment Advisors, LLC (“OneDigital Investment Advisors”), an SEC-registered adviser. OneDigital Investment Advisors is currently the only client of OneDigital Asset Management for the services detailed in this brochure.

Additional information about OneDigital Asset Management is also available via the SEC’s website: [www.advisorinfo.sec.gov](http://www.advisorinfo.sec.gov).

## **Item 2 – Material Changes**

This Brochure, dated March 29, 2024, represents its first annual update to the initial filing of this document by OneDigital Asset Management on December 22, 2022.

This brochure has been updated to provide information regarding additional investment models used to manage clients' accounts. In addition, any reference to the possibility of using OneDigital Asset Management for retirement plan participant accounts has been removed.

Pursuant to SEC Rules, OneDigital will deliver a summary of any materials changes to this and subsequent Brochures to you within 120 days of the close of our fiscal year, as well as providing notices of material changes as necessary. All such information will be provided to you free of charge.

OneDigital's Brochure may be requested by contacting 877-742-2021. Additional information about OneDigital is also available via the SEC's web site [www.advisorinfo.sec.gov](http://www.advisorinfo.sec.gov). The SEC's web site also provides information about any persons affiliated with OneDigital who are registered as investment adviser representatives of the firm.

## Item 3 – Table of Contents

### Contents

Item 1 – Title Page .....	i
Item 2 – Material Changes.....	ii
Item 3 – Table of Contents .....	iii
Item 4 – Advisory Business.....	1
Item 5 – Fees and Compensation.....	1
Item 6 – Performance-Based Fees and Side-By-Side Management .....	1
Item 7 – Types of Clients .....	2
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss .....	2
Item 9 – Disciplinary Information .....	4
Item 10 – Other Financial Industry Activities and Affiliations.....	4
Item 11 – Code of Ethics.....	5
Item 12 – Brokerage Practices.....	6
Item 13 – Review of Accounts.....	6
Item 14 – Client Referrals and Other Compensation .....	6
Item 15 – Custody .....	6
Item 16 – Investment Discretion .....	6
Item 17 – Voting Client Securities .....	7
Item 18 –Financial Information.....	10



#### **Item 4 – Advisory Business**

OneDigital Asset Management is an “related adviser” (as that term is defined under Rule 203A-2(b) of the Investment Advisers Act) of OneDigital Investment Advisors LLC, which is an SEC registered investment adviser (CRD # 106766). OneDigital Asset Management was organized as a limited liability company under the laws of the State of Delaware on December 21, 2021 and is a wholly-owned subsidiary of Digital Insurance LLC, which also owns OneDigital Investment Advisors.

OneDigital Asset Management was created to enable certain new investment models utilized by OneDigital Investment Advisors to be scored for GIPS compliance purposes. This will enable OneDigital Investment Advisors to disclose the performance of those models to existing and potential clients to help them make informed investment decisions.

As a result, OneDigital Asset Management will not provide direct advice to any individual clients. Instead, the firm will only coordinate certain investment models OneDigital Investment Advisors utilizes to manage its clients’ accounts. Each of those models were initially funded with seed money provided by the firm’s parent company (Digital Insurance LLC) in order to obtain a “clean” record of the models’ performance in 2022, and new models will continue to be funded in this manner.

As of December 31, 2022, OneDigital Asset Management managed approximately \$588,456 in assets- all of it on a discretionary basis.

#### **Item 5 – Fees and Compensation**

As noted above, OneDigital Asset Management does not currently provide any direct investment advisory or management services to outside parties. Its sole current function is to coordinate a series of investment models OneDigital Investment Advisors utilizes to manage its client accounts. Because they are related entities and utilize the same employees, OneDigital Asset Management does not charge OneDigital Investment Advisors a fee for those services.

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

OneDigital Asset Management does not collect any performance-based fees.

## **Item 7 – Types of Clients**

OneDigital Asset Management currently only manages investment models OneDigital Investment Advisors offers to its clients.

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

OneDigital Asset Management will, either in partnership with outside money managers or through its own team of investment professionals, develop and coordinate certain investment options that OneDigital Investment Advisor's representatives can use to create asset allocation strategies that correspond to their clients' specific investment goals, tolerance for risk, and personal values.

At the present time, OneDigital Asset Management is offering the following investment options:

1. Core

The Core models are all-in-one core portfolios, available for all target risk profiles from Conservative to Aggressive Growth. These models seek to achieve optimal risk-adjusted returns over the long-term with quarterly rebalancing, and are constructed in a scalable, cost-efficient way using low-cost ETFs in an open architecture framework. The Core models may be rebalanced more frequently under certain economic and market conditions to control deviation from the target risk benchmarks (tracking error).

2. Tax-Aware Core

The Tax-Aware Core models are all-in-one, core portfolios available for all risk profiles from Conservative to Aggressive Growth with a preference for tax-exempt fixed income. These models seek optimal risk-adjusted after-tax returns over the long-term with annual rebalancing and are constructed in a scalable, cost-efficient way using low-cost ETFs in an open architecture framework.

3. Target Income

The Target Income models are a suite of fixed income options with allocations that seek different levels of income generation and exposure to risk. This investment strategy seeks primarily current income, and to a lesser extent, long-term capital appreciation, with a goal of generating slightly more income than the Barclay's U.S. Aggregate Bond Index with similar risk.

4. Sustainable

The Sustainable models are all-in-one, core portfolios, available for all risk profiles from Conservative to Aggressive Growth with a preference for Environmental, Social and Corporate Governance (ESG) investment vehicles. These models seek to achieve optimal risk-adjusted returns over the long-term with quarterly rebalancing and are constructed in a scalable, cost- efficient way using low-cost ETFs in an open architecture framework.

5. Stock Investing

The Global Leaders investment strategy seeks to buy quality businesses with strong prospects for outsized returns. The strategy holds 25-35 stocks using fundamental stock selection, invests about 30% in global stocks through ADRs, and the rest in U.S. stocks. The strategy invests in stocks that deem to have secular drivers for growth as market share leaders within a nascent market.

6. Taxable Enhanced Core

The strategy seeks to improve upon the low yields and high interest rate risk of passive bond strategies while preserving equity diversification. It invests in a broadly diversified portfolio of PIMCO Fixed Income Exchange Traded Funds (ETFs), which include short-term treasuries, short-term corporate bonds, mortgage-backed securities, investment grade corporate bonds, and high-yield corporate bonds.

7. Avantis Equity

Avantis Equity Model seeks to outperform the broad equity market with diversified allocation to ETFs that invests in equities, Developed International equities, and Emerging equities by overweighting smaller cap companies with high book-to-price ratios and underweighting mega cap companies with book-to-price ratios. Avantis Equity Model may carry a higher tilt toward value investment style and smaller capitalization.

8. Avantis/PIMCO

The Avantis/PIMCO models' use a combination of the Avantis Equity and Taxable Enhanced Core models in 20% increments.

9. Global Tactical Allocation

The Global Tactical Allocation and U.S. Leaders models seek to outperform target risk benchmarks ranging from Conservative to Aggressive Growth with tactical allocation to equity, fixed income and cash using macroeconomic, fundamental, sentiment and trend indicators in a quantitative framework. Because these models invest in individual stocks, as opposed to highly diversified ETFs and mutual funds, they are

likely to be more volatile than other models.

#### 10. Structural Alpha

The Structural Alpha models are constructed using a unique and non-conventional approach to incorporate direct and efficient use of diversification and leverage to seek alpha opportunities without material increase in portfolio risk. These models carry allocation to ETF allocation - (a) capital-efficient core capital, (b) equity and downside hedges, and (c) traditional and non-traditional fixed income and liquid alternatives.

Additional investment options, including alternative investments, are available, and more continue to be added as OneDigital Asset Management develops products with new and existing third-party money managers, including Dimensional Fund Advisors (“DFA”). All of these strategies involve risk, including the loss of the investors’ principal, and OneDigital does not guaranty any specific results for any of its model portfolios.

### **Item 9 – Disciplinary Information**

OneDigital Asset Management and its “management persons” are required to disclose all material facts regarding any legal or disciplinary events that would be material to the evaluation of the firm or the integrity of its management, such as criminal convictions or violations of securities laws. (A “management person” is generally defined as any of the firm’s principal executive officers and members of the firm’s investment committee.) Neither OneDigital Asset Management nor any of its executive officers and investment committee members are currently subject to, or have ever been subject to, any material events resulting from legal or disciplinary action.

### **Item 10 – Other Financial Industry Activities and Affiliations**

As noted above, OneDigital Asset Management works with outside asset managers to develop and maintain investment models to be used by representatives of OneDigital Investment Advisors to allocate the assets in their clients’ accounts. OneDigital Asset Management has entered into written agreements with some of those asset managers to define each party’s roles and responsibilities, as well as the fees to be paid to those managers. Those fees will ultimately be borne by OneDigital Investment Advisors’ clients, based upon the specific strategies utilized. OneDigital Asset Management retains the right to terminate those agreements and/or to enter into new agreements with additional asset managers, as it deems appropriate.

## **Item 11 – Code of Ethics**

### **Code of Ethics**

Because it does not have any employees but relies upon services provided by the employees of OneDigital Investment Advisors, OneDigital Asset Management does not maintain its own Code of Ethics. In compliance with Rule 204A-1 of the Investment Advisors Act, OneDigital Investment Advisors has adopted a Code of Ethics expressing the firm's commitment to ethical conduct, which also applies to OneDigital Asset Management. The Code of Ethics describes the firm's fiduciary duties and responsibilities to clients by requiring compliance with applicable securities laws, including those that protect the confidentiality of client information, require the reporting of personal securities transactions, and prohibit trading on insider information. Each of OneDigital Investment Advisors' "access persons" is required to acknowledge receipt of the firm's Code of Ethics within ten (10) business days of joining the firm. In addition, each access person is required to annually acknowledge that their continued employment is contingent upon their compliance with its terms.

### **Trading Conflicts of Interest**

OneDigital Investment Advisors' access persons are permitted to buy or sell securities for their personal accounts that are identical to transactions recommended to clients. However, in order to address potential conflicts of interest, OneDigital Investment Advisors prohibits its access persons from trading a security in their personal accounts, if they reasonably believe the security will be purchased or sold in a client's account, unless the access person's transaction is included as part of a block/batched trade with the firm's client accounts. This prohibition only extends to transactions initiated by the access person, though, and does not apply to accounts managed by OneDigital's Investment Team (in which case transactions in the access person's account are conducted on the same basis as other accounts) or accounts managed by a TAMP.

For this reason, OneDigital Investment Advisors requires its access persons to disclose their holdings of "reportable securities" annually and transactions in such securities each quarter. ("Reportable securities" do not include shares of mutual funds or government-issued securities.) Those reports are then reviewed by OneDigital Investment Advisors' Compliance Department to ensure its access persons are not engaging in "front-running" or other prohibited acts which put their interests ahead of those of its clients. OneDigital Investment Advisors also requires its access persons to obtain prior approval from its Chief Compliance Officer before investing in any limited investment opportunities (i.e., initial public offerings or shares in a thinly traded security) so they do not appropriate a trading opportunity that should rightfully belong to OneDigital Investment Advisors' clients. Finally, before an access person can invest in a publicly held company that is a retirement plan client of OneDigital Investment Advisors, the access person must confirm that any trading decision is not based

upon nonpublic, insider information.

### **Item 12 – Brokerage Practices**

OneDigital Asset Management does not maintain physical custody of any client accounts or any assets within them. Instead, OneDigital Investment Advisors' clients are required to deposit assets at a broker-dealer, investment company, or another financial institution that meets the definition of a "qualified custodian" under Rule 206(4)-2(c)(3) of the Investment Advisers Act. Employees of OneDigital Investment Advisors then process all trades in those accounts through that custodian.

### **Item 13 – Review of Accounts**

OneDigital Asset Management works with third party asset managers to monitor market conditions and to discuss potential changes to its investment strategies based upon changes to world, economic, and market conditions. OneDigital Asset Management may add or terminate investment strategies as it deems appropriate.

### **Item 14 – Client Referrals and Other Compensation**

OneDigital Asset Management does not provide or receive any client referrals for compensation.

### **Item 15 – Custody**

OneDigital Asset Management does not maintain custody of any client assets.

### **Item 16 – Investment Discretion**

OneDigital Asset Management does not have discretion to make any trades in clients' accounts. Instead, it coordinates the maintenance of certain investment models that representatives of OneDigital Investment Advisors can use to manage their clients' assets. Therefore, any trades in clients' accounts based upon those models is conducted by members of OneDigital Investment Advisors' Investment Team, representatives of OneDigital Investment Advisors, or the selected third-party asset manager.

### **Item 17 – Voting Client Securities**

OneDigital Asset Management does not vote on securities held in client accounts (i.e., proxy requests). In addition, it does not take any action or render advice with respect to the voting of proxies, unless it believes the advice is appropriate and necessary.

### **Item 18 – Financial Information**

Registered investment advisors are required in some cases to provide certain financial information and/or disclosures about its financial condition. However, none of these factors are applicable to OneDigital Asset Managers, so no such disclosures are necessary.