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**RICHMOND CAPITAL MANAGEMENT**  
*Experience, Knowledge, Service*

**Richmond Capital Management, Inc.**

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Chief Compliance Officer

**Part 2A of Form ADV  
Firm Brochure  
Summary of Material Changes**

**March 19, 2024**

This brochure provides information about the qualifications and business practices of Richmond Capital Management. If you have any questions about the contents of this brochure, please contact us at (804) 379-8280 and/or [services@richmondcap.com](mailto:services@richmondcap.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. Additional information about Richmond Capital Management is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Our CRD number is 104636. Richmond Capital Management is a "registered investment adviser." Registration does not imply a certain level of skill or training.

## **Material Changes**

Below is a summary list of material changes to Part 2A of Form ADV (Firm Brochure) dated March 23, 2023. You may obtain a copy of the new brochure by contacting Howard Bos, President at (804) 379-8283 or [hbos@richmondcap.com](mailto:hbos@richmondcap.com), or Elizabeth Harris, Managing Director, Client Services at (804) 379-8282 or [eharris@richmondcap.com](mailto:eharris@richmondcap.com).

## **Item 10 (Review of Accounts)**

The following paragraph has been removed.

- The firm has always placed a tremendous emphasis on reconciliations and maintaining accurate accounting records. We perform a comparison of par amount held and price for each bond in each portfolio and reconcile accruals in the aggregate. Additionally, cash differences are reconciled to highlight any differences in expected and actual cash received into the portfolio (in most cases daily through on-line access of our portfolio accounting system). We communicate with the custodian bank any inconsistencies and follow up until solutions are reached. We make available to each client and their consultant a detailed reconciliation of the custodian statement if requested.