

Form ADV Part 2A

Item 1 Cover Page

RDM Capital Associates, Inc.
263 Broad Street
Red Bank, New Jersey 07701
www.rdmcapital.com
Bruno LaRocca
Matthew L. LaRocca

February 09, 2024

This brochure provides information about the qualifications and business practices of RDM Capital Associates, Inc. If you have any questions about the contents of this brochure, please contact us at 732-576-1671 or email blr@rdmcapital.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 RDM Capital Associates, Inc. also is available on the SEC's website at www.adviserinfo.sec.gov.

RDM Capital Associates, Inc. is a registered investment adviser. Such registration does not imply a certain level of skill or training.

Item 2 Material Changes

The material changes in this brochure will be updated annually or when material changes occur since the last annual updating amendment of RDM Capital Associates, Inc on 03/07/2023. Material changes relate to RDM Capital Associates, Inc's policies, practices or conflicts of interests only.

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Item 4 Advisory Business

RDM Capital Associates, Inc. has been a Registered Investment Adviser since inception of the firm, July 1, 1989. The principals are:

Bruno LaRocca

Date of birth:	January 11, 1942
Education:	Cornell University, Bachelor of Science, Industrial and Labor Relations, 1964 New York University, 1971, completed night graduate studies for MBA in Finance and Economics. Unable to complete Master's thesis due to overseas transfer with Bankers Trust Co., New York
Business background:	RDM Capital Associates, Inc., 7/1992 to Present President, Secretary, Director

Matthew L. LaRocca

Date of birth:	April 27, 1982
Education:	Cornell University, Bachelor of Science, Industrial and Labor Relations, 2004 Villanova University, Juris Doctor, 2008
Business background:	RDM Capital Associates, Inc., 10/2010 to 4/2014, Vice President; 5/2014 to Present, Managing Director Skadden, Arps, Slate, Meagher & Flom LLP, 6/2008 to 10/2010, Attorney

Bruno LaRocca owns 80% of Registrant. Matthew LaRocca owns 20% of Registrant.

The services Registrant offers to clients are as follows: Registrant provides continual advice to clients regarding the investment of funds. Investment advice and decisions are based on the individual needs and investment objectives of each client. Registrant employs generally a long term growth and value investment strategy. Registrant also provides financial planning services to its clients, including budgeting, retirement planning and advice on financial matters affecting our clients. Registrant provides the services listed above to individuals and institutional clients. Portfolio

management service is conducted by managing separately managed accounts for each client. Registrant typically invest the accounts in a mix of individual securities, ETFs and/or mutual funds, depending on the needs, goals and objectives of the client. Registrant will develop an investment plan through consultation with each client that is intended to meet their long-term financial goals.

The registrant will also perform financial planning for clients on a limited basis, which consists of advice on retirement and education planning, budgeting living expenses, and any other particular financial goal of the client. The registrant will typically meet with client's multiple times at the outset of the process to develop an initial financial plan and then review and revise the financial plan on an annual or as needed basis.

Registrant advises and manages some accounts without specific knowledge of the individual needs of the client, but solely on the analysis of the portfolios. Registrant's compensation for advising such accounts is the same as stated under Item 5.

Written Acknowledgement of Fiduciary Status

When the Registrant provides investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries 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. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

On occasion, at the request of a client and in conjunction with managing an account, Registrant will consult with a client about investment matters or the securities of a particular corporation. A client may impose restrictions on investing in certain securities or types of securities. Registrant has no established fee for such consultation which may be done without a fee.

Registrant does not participate in wrap fee programs.

Assets managed as of March 2024 are as follows:

Discretionary: \$ 107,080,550

Non-Discretionary: \$ 0.00

Item 5 Fees and Compensation

Registrant's annual fees are negotiable, but they generally range between 1 to 2%. Registrant does not have a formal fee schedule. Registrant typically charge 1.5% of assets under management for equity-based accounts. This percentage is negotiable and as a result we may reduce the percentage, for example for clients with larger assets under management. For fixed income-based accounts, we typically charge 0.45% of assets under management. Fees are deducted at the beginning of each quarter from client accounts. Fees are calculated as a percentage of assets under management. The percentage used in calculating fees typically varies based on the size of the client's account. The percentage used for smaller accounts typically is higher than the percentage for larger accounts.

Fees are billed on a quarterly basis in advance, prior to each quarter. Advisory service contracts may be terminated on 30 days notice by either the client or Registrant. If a contract is terminated, the unearned portion of any prepaid fee is refunded to the client.

Fees are generally deducted at the beginning of each quarter from client's assets. Clients have the option to be billed directly.

Clients will incur brokerage fees (commissions) and other transaction costs. Clients should recognize that assets invested in mutual funds, ETFs and/or money market funds are charged a fee by the fund managers as well as a quarterly fee based on the market value of assets under Registrant's management. See Section 12 for a discussion of brokerage.

Registrant does not receive any compensation from any other source. Registrant and its supervised persons do not accept commissions from investment adviser clients.

Clients have the option to purchase investment products (that we recommend) through other brokers or agents that are not affiliated with Registrant.

Item 6 Performance-Based Fees

A negotiated and mutually agreed on performance fee of up to 25% may also be charged if permitted by Federal securities law in accordance with Rule 205-3, as amended, and applicable State securities laws. Registrant manages both performance fee accounts and accounts that are not performance fee accounts. Any performance fee is based on the total of all realized and unrealized gains and losses and paid on a mutually agreed upon rolling period (quarterly, semi-annually or annually). Performance-based compensation may create an incentive for an adviser to recommend an investment that may carry a higher degree of risk to the client. Performance fee accounts also may create an inherent conflict of interest to the extent they incentivize favoring these accounts over non performance-based accounts. However, Registrant manages such a potential conflict of interest by not favoring performance fee accounts over any other accounts, or otherwise favoring performance fee accounts.

Item 7 Types of Clients

Registrant manages portfolio assets for individuals, pensions and profit sharing plans, trusts and estates and corporations. There is no minimum account size required.

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

Registrant offers advice on exchange-listed securities, securities traded over the counter, foreign issuers, corporate debt securities, US Government securities, Municipal securities and mutual fund shares (limited).

Registrant's security analysis methods include fundamental and technical from sources as financial newspapers and magazines, inspections of corporate activities, research materials prepared by others, annual reports, prospectuses and filings with the SEC and company press releases. Clients should be aware that there is a material risk of loss using any investment strategy.

Registrant follows a strict, fundamental analysis and value-based approach to investment management. Under this approach, the most important criteria for security evaluation are deemed to be:

- Low price to cash flow
- Low price to net asset value
- Low debt to capitalization
- Consistent earnings growth
- Consistent dividend growth rate
- Overall financial strength
- Sustainable Payout ratio
- Experienced management
- Product leadership
- Low multiple of price earnings

Registrant believes from experience and from market studies done by others and covering several years, that a low price/earnings multiple, fundamental analysis and value-based approach to equity investing results in superior performance over time when compared to the market as a whole. The holding period for the successful implementation of this strategy tends to be longer than one year.

Registrant uses a broadly diversified portfolio, both as to industries and companies, selected in accordance with the criteria outlined above, in an attempt to achieve superior market performance within the context of a low degree of risk.

Investing in securities involves risk of loss that clients should be prepared to bear.

Item 9 Disciplinary Information

There are no criminal, civil actions, administrative proceedings or self-regulatory organization to report.

Item 10 Other Financial Industry Activities

Neither the Registrant nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

Neither the Registrant nor its representatives are registered as or have pending applications to become either a Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

Matthew LaRocca possesses a life insurance producer license in the state of New Jersey. From time to time, he will offer clients advice or products from those activities. Clients should be aware that these services pay a commission and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. RDM Capital Associates, Inc. always acts in the best interest of the client, including the sale of commissionable products to advisory clients. Clients always have the right to decide whether or not to utilize the services of any representative of RDM Capital Associates, Inc. in such individual's outside capacities.

Matthew LaRocca is a board member at Fair View Cemetery.

The Registrant does not utilize nor select third-party investment advisers.

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

Registrant has adopted a code of ethics pursuant to SEC Rule 204A-1. Such code of ethics is available to any client or prospective client on request. The code requires personnel to act within the law and to put client's interests first. Employees and officers may not engage in insider trading or assist in same. Personal trades must be pre-cleared by Bruno LaRocca.

Registrant manages personal investment accounts of its officers and employees. Such transactions are executed after all appropriate client accounts have had a reasonable opportunity to purchase or sell the security and/or are executed pari passus (on an equal basis) with clients. Trades done for the principals are made after all reasonable opportunity to act on behalf of clients has occurred.

In highly rare circumstances, Registrant may effect cross transactions among advisory clients. Such circumstances would most likely be associated with tax-related transactions of illiquid unlisted issues. The cross would usually be midway between the bid and asked price, thereby benefiting both buyer and seller.

Any adverse financial condition of Registrant will be promptly reported to clients.

In cases of class action lawsuits, Registrant may assist in compiling documentation, but it is the clients' responsibility to file.

Item 12 Brokerage Practices

Registrant provides both discretionary and non-discretionary investment advisory services. Registrant usually exercises discretionary authority to determine through which broker or dealer securities are to be bought or sold and the commission rates for securities transactions. A limited number of clients maintain discretionary authority to determine through which broker or dealer securities for their account are to be bought or sold. Clients directing brokerage may be unable to achieve favorable execution of their transactions and this may cost clients more money in higher commissions or not best execution since they may not be able to aggregate orders to reduce transaction costs. Registrant aggregates the purchase or sale of securities across multiple client accounts when Registrant believes the purchase of such securities is appropriate in each such client account.

Brokers are selected based on their ability to execute orders efficiently, on cost effectiveness and on the quality of investment research provided to Registrant. Broker commission charges and order execution are continually monitored by Registrant. A broker may be paid a commission for a trade in excess of that which another broker may charge in recognition of the selected broker's ability to execute the transaction more efficiently and in recognition of research provided. Research services provided to the Registrant by brokers and dealers generally consist of written analyses, meetings with brokers' economic and investment analysis personnel and meetings with company management. The nature and quality of the investment research services provided by brokers is formally reviewed at least annually by Registrant's management personnel. Registrant has no agreements or understandings with any broker concerning the directing of brokerage commissions because of research services provided.

Orders at a given brokerage firm may be bunched which, the Registrant believes, is more efficient and tends to give the clients better execution and lower commissions per share. The size of such orders is rarely large enough to negatively affect the price of the security, in the opinion of the Registrant. Orders for clients who wish to direct brokerage in their account will be executed later.

In order to facilitate its research, Registrant receives the following products from Pershing (clearing and custodial broker) under a soft dollar arrangement:

- Streaming quotes (Pershing product)
- Portfolio management applications
- Professional publications

Registrant receives a benefit from soft dollar arrangements because it does not have to produce or pay for the research, products or services. An adviser may have an incentive to select or recommend a broker-dealer based on its interest in receiving the research or other products or services, rather than on a client's interest in receiving most favorable execution. However, clients do not pay higher commissions than those that would be charged by other brokers for the soft dollar products. All clients pay for the soft

dollar arrangement through commissions and all clients benefit from it. Registrant does not select or recommend broker dealers based on an interest in receiving research or other products or services.

Registrant receives NetX360 (portfolio management system) from Pershing that provides non-research administrative services.

Item 13 Review of Accounts

Client portfolios are reviewed in detail continually by Bruno LaRocca and Matthew LaRocca. Decisions are made on an account-by-account basis, depending on the specific needs and objectives of each client. A complete appraisal of all client accounts is prepared and reviewed monthly for each account.

Clients receive confirmations of all trades in their account at the time of the trade. A complete written appraisal of the account is provided quarterly, or more frequently if requested.

Item 14 Client Referrals and Other Compensation

Registrant does not compensate or have any arrangements for client referrals. Registrant does not have any arrangements with anyone to provide investment advice or other advisory services to Registrant's clients.

Item 15 **Custody**

Registrant does not have custody of client funds or securities. Clients will receive statements from Registrant's custodian, Pershing Advisor Solutions, should review those statements carefully and should compare these statements to any information received from Registrant.

Item 16 Investment Discretion

Registrant's investment management contracts with clients grant full discretionary authority to Registrant. Other investment management contracts do not grant discretionary authority. The procedures Registrant follows before receiving such discretionary authority is to describe the proposed discretionary authority to clients, provide an investment management contract to clients providing for such discretionary authority, and refrain from exercising any discretionary authority until receiving a signed investment management contract from clients.

Item 17 Voting Client Securities

Registrant does not vote proxies for its clients. Clients have the right to vote proxies by informing Registrant of such desire. Clients may receive proxies from Pershing Advisor Solutions and may contact Registrant with questions about a particular solicitation.

Item 18 Financial Information

Registrants are required to furnish a balance sheet for the most recent fiscal year if they require prepayment of more than \$500 in fees per client six months or more in advance.

In light of the COVID-19 coronavirus and historic decline in market values, RDM has elected to participate in the CARES Act's Paycheck Protection Program ("PPP") to strengthen its balance sheet. RDM intends to use this loan predominantly to continue payroll for the firm and may ultimately seek loan forgiveness per the terms of the PPP. Due to this and other measures taken internally, RDM has been able to operate and continue serving its clients.

Registrant has not been the subject of any bankruptcy petition during the past 10 years.

Item 19 Requirements for State-Registered Advisers

A negotiated and mutually agreed on performance fee of up to 25% may also be charged if permitted by Federal securities law in accordance with Rule 205-3, as amended, and applicable State securities laws. Any performance fee is based on the total of all realized and unrealized gains and losses and paid on a mutually agreed upon rolling period (quarterly, semi-annually or annually). Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

Registrant and/or management persons have not been required to pay an award or been found liable in any arbitration and/or any civil, self-regulatory organization, or administrative proceeding.

Bruno LaRocca and Matthew LaRocca are members of general partnerships that own interests in real estate limited partnerships that issue limited partner interests. Registrant is not involved in and has no interest in such limited partnerships.

Form ADV Part 2B

Item 1

Bruno LaRocca
RDM Capital Associates, Inc.
263 Broad Street
Red Bank, New Jersey 07701
732-576-1671

This brochure supplement provides information about Bruno LaRocca that supplements the RDM Capital Associates, Inc. brochure. You should have received a copy of that brochure. Please contact Bruno LaRocca if you did not receive the RDM Capital Associates, Inc. brochure or if you have any questions about the content of this supplement.

Additional information about Bruno LaRocca is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2: Educational Background and Business Experience

Bruno LaRocca

Date of birth: January 11, 1942

Formal education after high school:

Cornell University, Bachelor of Science, Industrial and Labor Relations, 1964;
New York University, 1971, completed night graduate studies for MBA in
Finance and Economics. Unable to complete Master's thesis due to overseas
transfer with Bankers Trust Co., New York

Business background: RDM Capital Associates, Inc., 7/1992 to Present, President,
Director

Item 3: Disciplinary Information

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business.

Item 4: Other Business Activities

Bruno LaRocca is not engaged in any investment-related business or occupation (other than this advisory firm).

Item 5: Additional Compensation

Other than salary, annual bonuses, or regular bonuses, Bruno LaRocca does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through RDM Capital Associates, Inc.

Item 6: Supervision

Supervision at RDM Capital is conducted through a multi-tiered approach. First, we have written policies and procedures regarding the conduct of our business, including new accounts, office operations, books and records, trading operations, correspondence

and advertising, and investment selection. Under our policies and procedures, an advisor is permitted to recommend an investment only if the advisor has conducted adequate due diligence and the investment comports with our underlying investment philosophy. These internal controls govern all investment recommendations from a RDM Capital advisor. Second, each advisor is supervised by the other advisors at RDM Capital. We generally provide investment services through a team approach, such that each of us supervises each other's conduct and recommendations. This supervision includes participating in meetings between another advisor and a client and reviewing recommendations to the client. Finally, we regularly meet with our clients to review their investments and educate them on their investment decisions. During our meetings, we provide our latest analysis of the market, make sure that each client is aware of the status of their investments, and answer any questions that our clients may have. The information provided at our meetings is vetted through each advisor at RDM Capital to ensure we are providing the client with the most current, accurate and comprehensive information affecting their accounts.

Mr. LaRocca is supervised by Matthew LaRocca, Managing Director, who can be reached at 732-576-1671.

Item 7: Requirements for State-Registered Advisers

This disclosure is required by state securities authorities and is provided for your use in evaluating this investment advisor representative's suitability.

A. Bruno LaRocca has not been involved in any of the events listed below.

1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
 - a) an investment or an investment-related business or activity;
 - b) fraud, false statement(s), or omissions;
 - c) theft, embezzlement, or other wrongful taking of property;
 - d) bribery, forgery, counterfeiting, or extortion; or
 - e) dishonest, unfair, or unethical practices.
2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
 - a) an investment or an investment-related business or activity;
 - b) fraud, false statement(s), or omissions;
 - c) theft, embezzlement, or other wrongful taking of property;
 - d) bribery, forgery, counterfeiting, or extortion; or
 - e) dishonest, unfair, or unethical practices.

B. Bruno LaRocca has not been the subject of a bankruptcy petition.

Item 1

Matthew L. LaRocca
RDM Capital Associates, Inc.
263 Broad Street
Red Bank, New Jersey 07701
732-576-1671

This brochure supplement provides information about Matthew LaRocca that supplements the RDM Capital Associates, Inc. brochure. You should have received a copy of that brochure. Please contact Matthew LaRocca if you did not receive the RDM Capital Associates, Inc. brochure or if you have any questions about the content of this supplement.

Additional information about Matthew LaRocca is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2: Educational Background and Business Experience**Matthew L. LaRocca**

Date of birth: April 27, 1982

Formal education after high school:

Cornell University, Bachelor of Science, Industrial and Labor Relations, 2004
Villanova University, Juris Doctor, 2008

Business background:

RDM Capital Associates, Inc., 10/2010 to 4/2014, Vice President; 5/2014 to Present, Managing Director
Skadden, Arps, Slate, Meagher & Flom LLP, 6/2008 to 10/2010, Attorney

Item 3: Disciplinary Information

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business.

Item 4: Other Business Activities

Matthew LaRocca possesses a life insurance producer license in the state of New Jersey. From time to time, he will offer clients advice or products from those activities. Clients should be aware that these services pay a commission and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. RDM Capital Associates, Inc. always acts in the best interest of the client, including the sale of commissionable products to advisory clients. Clients always have the right to decide whether or not to utilize the services of any representative of RDM Capital Associates, Inc. in such individual's outside capacities.

Matthew LaRocca is a board member at Fair View Cemetery.

Item 5: Additional Compensation

Other than salary, annual bonuses, or regular bonuses, Matthew L. LaRocca does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through RDM Capital Associates, Inc.

Item 6: Supervision

Supervision at RDM Capital is conducted through a multi-tiered approach. First, we have written policies and procedures regarding the conduct of our business, including new accounts, office operations, books and records, trading operations, correspondence and advertising, and investment selection. Under our policies and procedures, an advisor is permitted to recommend an investment only if the advisor has conducted adequate due diligence and the investment comports with our underlying investment philosophy. These internal controls govern all investment recommendations from a RDM Capital advisor. Second, each advisor is supervised by the other advisors at RDM Capital. We generally provide investment services through a team approach, such that each of us supervises each other's conduct and recommendations. This supervision includes participating in meetings between another advisor and a client and reviewing recommendations to the client. Finally, we regularly meet with our clients to review their investments and educate them on their investment decisions. During our meetings, we provide our latest analysis of the market, make sure that each client is aware of the status of their investments, and answer any questions that our clients may have. The information provided at our meetings is vetted through each advisor at RDM Capital to ensure we are providing the client with the most current, accurate and comprehensive information affecting their accounts.

Mr. LaRocca is supervised by Bruno LaRocca, President, who can be reached at 732-576-1671.

Item 7: Requirements for State-Registered Advisers

This disclosure is required by state securities authorities and is provided for your use in evaluating this investment advisor representative's suitability.

- C. Matthew LaRocca has not been involved in any of the events listed below.
3. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
 - f) an investment or an investment-related business or activity;
 - g) fraud, false statement(s), or omissions;
 - h) theft, embezzlement, or other wrongful taking of property;
 - i) bribery, forgery, counterfeiting, or extortion; or
 - j) dishonest, unfair, or unethical practices.
 4. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
 - f) an investment or an investment-related business or activity;

- g) fraud, false statement(s), or omissions;
- h) theft, embezzlement, or other wrongful taking of property;
- i) bribery, forgery, counterfeiting, or extortion; or
- j) dishonest, unfair, or unethical practices.

D. Matthew LaRocca has not been the subject of a bankruptcy petition.