

Item 1 Cover Page

Part 2 of Form ADV

Firm Brochure

Riggs Capital Management, LLC

D/B/A Crow Creek Wealth, LLC

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Phone: (801) 221-7923

Website: www.rcminvestments.com

Date: March 25, 2024

This brochure provides information about the qualifications and business practices of Crow Creek Wealth, LLC. If you have any questions about the contents of this brochure, please contact us at 415-367-4200. 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 Crow Creek Wealth, LLC is available on the SEC's website at www.adviserinfo.sec.gov. The Firm's CRD Number is 301998.

Please note that registration as an investment advisory firm does not imply a certain level of skill or training.

Item 2 Material Changes

We have made no material changes to this disclosure brochure since its original filing in 2022.

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Item 4 Advisory Business

About the Firm

Riggs Capital Management, Inc. is an investment advisory firm located in American Fork, Utah. We use the “doing business as” names of RCM Investments and Crow Creek Wealth when marketing our services to the public. We offer wealth management and financial planning and consulting services and have been offering investment advisory services since 2002. We have additional services we offer that are detailed in a separate disclosure brochure.

Our owners are Alpha Capital Advisors, Inc., Vertex Capital, Inc., and Fosteca, Inc. These firms are owned, respectively, by Jay A. Riggs, Craig Riggs and Cameron Foster.

Description of Advisory Services

Wealth Management Services

Crow Creek Wealth provides customized investment advisory and comprehensive wealth management solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary investment management and consulting services.

We believe it is best to keep the client fully informed, fully engaged, and fully educated on all investment decisions. We take great care in understanding Client’s risk tolerance and goals to guide us as we design their investment plans. In designing these plans, we will take into consideration outside accounts that are not on our platform. While it is important to maintain a diversified portfolio to weather volatile markets, each client’s individual risk tolerance and financial needs will differ and in turn lead to every client having a personalized asset allocation.

Once we have determined the right asset allocation, we then take great care in picking the right investment vehicles and the most efficient locations to hold these vehicles. We maintain an open architecture investment model that allows us to select the most appropriate investment for each asset class. Portfolios may include individual stocks and bonds, ETFs, United States government bonds, municipal securities, mutual funds and limited partnerships. We may also use low cost, passive index funds when appropriate. The Advisor may also utilize annuities, alternative investment strategies and other securities to meet the needs of its Clients.

Prior to rendering investment advisory services, Crow Creek Wealth will ascertain, in conjunction with the Client, the Client’s financial situation, risk tolerance, and investment objective[s]. Clients may impose reasonable restrictions on investing in certain securities or types of securities.

Crow Creek Wealth will provide investment advisory services and portfolio management services and will not provide securities custodial or other administrative services. All Client assets will be managed within their designated brokerage account or pension account, pursuant to the Client Investment Advisory Agreement.

Please refer to Item 8. Investment Strategies, Methods of Analysis, and Risk of Loss of this document for more information about how we manage investments. Our services are not offered as a wrap fee program.

Financial Planning and Consulting Services

Crow Creek Wealth will typically provide a variety of financial planning services to individuals and families. Services are offered in several areas of a Client’s financial situation, depending on their goals, objectives and financial situation.

Generally, such financial planning services will involve preparing a financial plan or rendering a financial consultation for clients based on the Client’s financial goals and objectives. This planning or consulting encompass one or more areas of need, including, but not limited to investment planning, retirement planning, personal savings, banking and lending, cash flow planning, education savings, estate planning, taxes, insurance and philanthropic planning and other areas of a Client’s financial situation.

A financial plan developed for or financial consultation rendered to the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, start or revise their investment programs, commence or alter retirement savings, establish education savings and/or charitable giving programs. Crow Creek Wealth will also refer Clients to an accountant, attorney or other specialist, as appropriate for their

unique situation. For certain financial planning engagements, the Advisor will provide a written summary of Client's financial situation, observations, and recommendations. For consulting or ad-hoc engagements, the Advisor may not provide a written summary. Plans or consultations are typically completed within six months of contract date, assuming all information and documents requested are provided promptly.

Financial planning and consulting recommendations can pose a potential conflict between the interests of the Advisor and the interests of the Client. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to implement the transaction through the Advisor.

Prior to engaging Crow Creek Wealth to provide investment advisory services, each Client is required to enter into an Investment Advisory Agreement with the Advisor that defines the terms, conditions, authority and responsibilities of the Advisor and the Client. These services can include:

- Establishing an Investment Policy Statement – Crow Creek Wealth, in connection with the Client, will develop a statement that summarizes the Client's investment goals and objectives along with the broad strategy[ies] to be employed to meet the objectives. An Investment Policy Statement generally includes specific information on the Client's stated goals, time horizon for achieving the goals, investment strategies, Client risk tolerance and any restrictions imposed by the Client.
- Asset Allocation – Crow Creek Wealth will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance for risk for each Client.
- Portfolio Construction – Crow Creek Wealth will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – Crow Creek Wealth will provide investment management and ongoing oversight of the Client's portfolio and overall account.
- The following paragraphs detail the fee structure and compensation methodology for investment management. Each Client shall sign an Investment Advisory Agreement that details the responsibilities of Crow Creek Wealth and the Client.

As of 12/31/2023, our discretionary assets under management were \$243 MM. As of 12/31/2023, we had no non-discretionary assets.

Item 5 Fees and Compensation

Wealth Management Fees

For our Wealth Management services, we collect an investment advisory fee based upon a percentage of Assets under Management as follows:

Managed Assets	Annual Percentage Rate
The first \$1,000,000	1.25%
Next \$2,000,000	1.00%
Next \$7,000,000	0.75%
\$10,000,000 or more	negotiable

These fees are negotiable and your final fee schedule is on Schedule A of the Investment Advisory Contract. Fees for Investment Supervisory services are paid quarterly in advance and are typically debited directly from your account. In certain instances, you may elect to be billed directly and to pay quarterly fees by check. We refund any pre-paid advisory fees for accounts terminated mid-quarter. You must notify us of the account termination to receive this refund. We calculate the amount owed to you based upon the number of days remaining in the quarter. You have the right to terminate our services within five days of signing the client agreement. If you do, you will receive a refund of all pre-paid fees.

Financial Planning and Consulting Services

Crow Creek Wealth offers financial planning or consulting services on a fixed fee basis ranging from \$1,000 to \$100,000, which is negotiable depending on the nature and complexity of each Client's circumstances. An estimate for total cost and hours will be determined prior to establishing the advisory relationship. The fee is due and payable upon completion. These services are payable by check. Our provision of these services relies upon the cooperation of the client and therefore although we do not anticipate any plan to take us greater than six months, the time for us to complete our planning and consulting services is dependent on the client's ability to provide any and all requested documentation to assist with the plan.

Fixed fee services may be provided for self-directed Ultra High Net Worth clients (\$50m+) where extensive work is done across multiple account registrations that impact multiple generations. Due to the level of complexity, significant time is spent with the client, their existing attorneys and accountants to develop a comprehensive plan based on their needs. When possible, we also like to include the impacted family members to facilitate financial conversations and help establish an understanding of their financial foundation and how implementing different strategies could potentially impact them.

The Advisor's fee is exclusive of, and in addition to brokerage fees, transaction fees, and other related costs and expenses, which will be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs.

Either we or our Clients may terminate a financial planning or consulting arrangement at any time. If you terminate the agreement after those five days we will pro-rate your fee based on the time already expended in preparing your plan.

Our advisory representatives are not licensed to sell securities. Should the adviser determine it suitable, in light of the client's situation, to recommend an exchange from an existing variable annuity investment to another, the variable annuity recommended would not be a commission-based investment. Neither we nor our supervised persons accept compensation for the sale of securities or other investment products.

Lower fees for comparable services may be available from other sources.

Item 6 Performance-Based Fees and Side-by-Side Management

We do not accept performance-based fees.

Item 7 Types of Clients

Our minimum account size is \$100,000. We may accept smaller accounts at our discretion. Typically, we would consider accepting smaller accounts when working with related accounts who meet our minimum account size or because of anticipated asset growth.

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

Our methods of analysis and investment strategies do not present any unique risks however all investing involves risks and clients should note that they may lose money. Our typical investment recommendations include equities, mutual funds and exchange traded funds, none of which have unusual or significant risks. Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy (including the investments and/or investment strategies recommended or undertaken by Crow Creek Wealth will be profitable or equal any specific performance level(s).

Crow Creek Wealth's investment strategy is primarily long-term focused, but the Advisor will buy, sell or re-allocate positions that have been held less than one year to meet the objectives of the Client or due to market conditions. Crow Creek Wealth will construct, implement and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to the acceptance by the Advisor.

Crow Creek Wealth evaluates and selects assets for inclusion in Client portfolios only after applying their internal due diligence process. Crow Creek Wealth will recommend, on occasion, redistributing investment allocations to diversify the

portfolio. Crow Creek Wealth will recommend specific positions to increase sector or asset class weightings. The Advisor will recommend employing cash positions as a possible hedge against market movement, which will adversely affect the portfolio. Crow Creek Wealth will recommend selling positions for reasons that include, but are not limited to harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client's risk tolerance.

There are always risks to investing. **Clients should be aware that all investments carry various types of risk including the potential loss of principal that clients should be prepared to bear.** It is impossible to name all possible types of risks. Among the risks are the following:

- **Political Risks.** Most investments have a global component, even domestic stocks. Political events anywhere in the world may have unforeseen consequences to markets around the world.
- **General Market Risks.** Markets can, as a whole, go up or down on various news releases or for no understandable reason at all. This sometimes means that the price of specific securities could go up or down without real reason, and may take some time to recover any lost value. Adding additional securities does not help to minimize this risk since all securities may be affected by market fluctuations.
- **Currency Risk.** When investing in another country using another currency, the changes in the value of the currency can change the value of your security value in your portfolio.
- **Regulatory Risk.** Changes in laws and regulations from any government can change the value of a given company and its accompanying securities. Certain industries are more susceptible to government regulation. Changes in zoning, tax structure or laws impact the return on these investments.
- **Tax Risks Related to Short Term Trading:** Clients should note that Crow Creek Wealth may engage in short-term trading transactions. These transactions may result in short term gains or losses for federal and state tax purposes, which may be taxed at a higher rate than long term strategies. Crow Creek Wealth endeavors to invest client assets in a tax efficient manner, but all clients are advised to consult with their tax professionals regarding the transactions in client accounts.
- **Purchasing Power Risk.** Purchasing power risk is the risk that your investment's value will decline as the price of goods rises (inflation). The investment's value itself does not decline, but its relative value does, which is the same thing. Inflation can happen for a variety of complex reasons, including a growing economy and a rising money supply.
- **Business Risk.** This can be thought of as certainty or uncertainty of income. Management comes under business risk. Cyclical companies (like automobile companies) have more business risk because of the less steady income stream. On the other hand, fast food chains tend to have steadier income streams and therefore, less business risk.
- **Financial Risk.** The amount of debt or leverage determines the financial risk of a company.
- **Risks specific to sub-advisors and other managers.** If we invest some of your assets with another advisor, including a private placement, there are additional risks. These include risks that the other manager is not as qualified as we believe them to be, that the investments they use are not as liquid as we would normally use in your portfolio, or that their risk management guidelines are more liberal than we would normally employ.
- **Default Risk.** This risk pertains to the ability of a company to service their debt. Ratings provided by several rating services help to identify those companies with more risk. Obligations of the U.S. government are said to be free of default risk.
- **Margin Risk.** "Margin" is a tool used to maximize returns on a given investment by using securities in a client account as collateral for a loan from the custodian to the client. The proceeds of that loan are then used to buy more securities. In a positive result, the additional securities provide additional return on the same initial investment. In a negative result, the additional securities provide additional losses. Margin therefore carries a higher degree of risk than investing without margin. Any client account that will use margin will do so in accordance with Regulation T. Crow Creek Wealth may utilize margin on a limited basis for clients with higher risk tolerances.
- **Short Sales.** "Short sales" are a way to implement a trade in a security Crow Creek Wealth feels is overvalued. In a "long" trade, the investor is hoping the security increases in price. Thus in a long trade, the amount of the investor's loss (without margin) is the amount paid for the security. In a short sale, the investor is hoping the security decreases in

price. However, unlike a long trade where the price of the security can only go from the purchase price to zero, in a short sale, the price of the security can go infinitely upwards. Thus in a short sale, the potential for loss is unlimited and unknown, where the potential for loss in a long trade is limited and knowable. Crow Creek Wealth utilizes short sales only when the client's risk tolerances permit.

- **Information Risk.** All investment professionals rely on research in order to make conclusions about investment options. This research is always a mix of both internal (proprietary) and external (provided by third parties) data and analyses. Even an adviser who says they rely solely on proprietary research must still collect data from third parties. This data, or outside research is chosen for its perceived reliability, but there is no guarantee that the data or research will be completely accurate. Failure in data accuracy or research will translate to a compromised ability by the adviser to reach satisfactory investment conclusions.

- **Small Companies.** Some investment opportunities in the marketplace involve smaller issuers. These companies may be starting up, or are historically small. While these companies sometimes have potential for outsized returns, they also have the potential for losses because the reasons the company is small are also risks to the company's future. For example, a company's management may lack experience, or the company's capital for growth may be restricted. These small companies also tend to trade less frequently than larger companies, which can add to the risks associated with their securities because the ability to sell them at an appropriate price may be limited as compared to the markets as a whole. Not only do these companies have investment risk, if a client is invested in such small companies and requests immediate or short term liquidity, these securities may require a significant discount to value in order to be sold in a shorter time frame.

- **Concentration Risk.** While Crow Creek Wealth selects individual securities, including mutual funds, for client portfolios based on an individualized assessment of each security, this evaluation comes without an overlay of general economic or sector specific issue analysis. This means that a client's equity portfolio may be concentrated in a specific sector, geography, or sub-sector (among other types of potential concentrations), so that if an unexpected event occurs that affects that specific sector or geography, for example, the client's equity portfolio may be affected negatively, including significant losses.

- **Transition risk.** As assets are transitioned from a client's prior advisers to Crow Creek Wealth there may be securities and other investments that do not fit within the asset allocation strategy selected for the client. Accordingly, these investments will need to be sold in order to reposition the portfolio into the asset allocation strategy selected by Crow Creek Wealth. However, this transition process may take some time to accomplish. Some investments may not be unwound for a lengthy period of time for a variety of reasons that may include unwarranted low share prices, restrictions on trading, contractual restrictions on liquidity, or market-related liquidity concerns. In some cases, there may be securities or investments that are never able to be sold. The inability to transition a client's holdings into recommendations of Crow Creek Wealth may adversely affect the client's account values, as Crow Creek Wealth's recommendations may not be able to be fully implemented.

- **Strategy Risk.** When investments are made through a strategy, rather than individualized investment considerations, there is always the possibility that individualized investment choices would have produced a more positive result for a client than an approach where investments are made for a group of individuals with common characteristics.

- **Restriction Risk.** Clients may at all times place reasonable restrictions on the management of their accounts. However, placing these restrictions may make managing the accounts more difficult, thus lowering the potential for returns.

- **Risks Related to Investment Term & Liquidity.** Securities do not follow a straight line up in value. All securities will have periods of time when the current price of the security is not an accurate measure of its value. If you require us to liquidate your portfolio during one of these periods, you will not realize as much value as you would have had the investment had the opportunity to regain its value. Further, some investments are made with the intention of the investment appreciating over an extended period of time. Liquidating these investments prior to their intended time horizon may result in losses.

- **REITs:** Capstone Investment Financial Group, LLC may recommend that portions of client portfolios be allocated to real estate investment trusts, otherwise known as "REITs". A REIT is an entity, typically a trust or corporation, that accepts investments from a number of investors, pools the money, and then uses that money to invest in real estate through either actual property purchases or mortgage loans. While there are some benefits to owning REITs, which include potential tax benefits, income and the relatively low barrier to invest in real estate as compared to directly

investing in real estate, REITs also have some increased risks as compared to more traditional investments such as stocks, bonds, and mutual funds. First, real estate investing can be highly volatile. Second, the specific REIT chosen may have a focus such as commercial real estate or real estate in a given location. Such investment focus can be beneficial if the properties are successful, but lose significant principal if the properties are not successful. REITs may also employ significant leverage for the purpose of purchasing more investments with fewer investment dollars, which can enhance returns but also enhances the risk of loss. The success of a REIT is highly dependent upon the manager of the REIT. Clients should ensure they understand the role of the REIT in their portfolio.

Item 9 Disciplinary Information

Neither we nor our advisory affiliates have been involved in any events that are material to a client's or prospective client's evaluation of Crow Creek Wealth or the integrity of its management.

Item 10 Other Financial Industry Activities and Affiliations

Neither our management persons nor the Adviser has an application pending to register as:

- A broker-dealer or a registered representative of a broker-dealer;
- A futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

Comparable services and/or lower fees may be available through other investment advisers.

We do not recommend or select other investment advisers for our clients.

In addition to our disclosure obligation, we believe that these conflicts are also addressed naturally through our other obligations, including;

- Our duty to have a reasonable, independent basis for our investment advice;
- Our duty to ensure that the advice we offer is appropriate, given your individual objectives, needs, and circumstances; and, Our duty
- Our duty to be loyal to clients.

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

We do not, as principals, buy securities for our own accounts from any client or sell securities we own to any client or as a broker or agent effect securities transactions for compensation for any client. Crow Creek Wealth and persons associated with us are allowed to invest for their own accounts or have a financial interest in the same securities or other investments that we acquire for your account. A material financial interest is defined as having a vested financial interest in a transaction that would reasonably be expected to impair the objectivity of our judgment. We do not recommend to clients, or buy or sell for client accounts any securities in which the firm or a related person has a MATERIAL financial interest.

We or our advisory representatives may buy or sell securities for client accounts at the same or similar time as we buy or sell securities for our client accounts. We strive to execute these types of transactions in a block or bunched trade to ensure that our clients receive the same price per share that we or our advisory representatives receive.

Because we engage in transactions that are substantially the same as those made for client accounts, conflicts of interest are substantially reduced but still exist. We recognize the fiduciary responsibility to place your interests first and have established policies in this regard to avoid any potential conflicts of interest.

We have developed and implemented a Code of Ethics (the "Code") that sets forth standards of conduct expected of our advisory personnel to mitigate this perceived conflict of interest. The Code of Ethics addresses, among other things, personal trading, gifts, the prohibition against the use of inside information and other situations where there is a possibility for conflict of interest.

The Code of Ethics is designed to protect our clients by deterring misconduct, educate personnel regarding the Firm's expectations and laws governing their conduct, remind personnel that they are in a position of trust and must act with complete propriety at all times, protect the reputation of Crow Creek Wealth, guard against violation of the securities laws, and establish procedures for personnel to follow so that we may determine whether they are complying with the Firm's ethical principles.

All advisory personnel are required to report to the firm's Chief Compliance Officer initial and annual holdings and quarterly transactions in reportable securities, and defined in the Code and the general standards of conduct and practices to be followed by all personnel to minimize conflicts of interest, including restrictions on gifts to or from brokers, clients and others, restrictions on service on the boards of other companies, restrictions on participation in investment clubs and policies designed to prevent personal trading conflicts. In addition, the Code (including the Firm's Insider Trading Policy Statement) includes provisions designed to prevent and enforce the Firm's strict policy against the misuse of material non-public information by all personnel. The Firm's Chief Compliance Officer is responsible for the oversight and administration of the Code.

All associated persons sign a letter of acknowledgement that they have read the Personal Trading Policy, fully understand it and abide by it at all times while under the employment of Crow Creek Wealth.

Additionally, we have established the following restrictions in order to ensure our Firm's fiduciary responsibilities and mitigate any conflicts of interest.

1. A director, officer or employee of Crow Creek Wealth shall not buy or sell any securities for their personal portfolio (s) where their decision is substantially derived, in whole or in part, by reason of his or her employment unless the information is also available to the investing public on reasonable inquiry. No director, officer or employee of Crow Creek Wealth shall prefer his or her own interest to that of the advisory client.
2. Crow Creek Wealth maintains a list of all securities holdings for itself and its advisory representatives.
3. We require that all individuals must act in accordance with all applicable Federal and State regulations governing registered investment advisory practices.
4. Any individual not in observance of the above may be subject to termination.

You may request a complete copy of our Code by contacting us at the address, telephone or email on the cover page of this Brochure.

Item 12 Brokerage Practices

We do not receive any client referrals from a broker-dealer or third party in relation to transactions done in your account.

We typically recommend Fidelity Institutional, member FINRA/SIPC, as a custodian. We chose Fidelity Institutional as our main custodian because of their customer service, technology, trade execution, and low expenses to clients. They have relatively low transaction fees, no custodial fees, provide many client services free of charge, and provide and document data on best execution for our review and monitoring. Other Advisers may not recommend a custodian to you.

Fidelity Institutional, member FINRA/SIPC, may provide us with marketing support, and/or training opportunities. We occasionally host client events and when doing so, Fidelity Institutional may assist us in paying for these events. We may receive support to attend educational seminars hosted by Fidelity Institutional which may include travel expenses. This additional support, provided to us by Fidelity Institutional, may or may not benefit our customer accounts. It may benefit customer accounts held with Fidelity Institutional but not accounts held elsewhere. For example, we may receive training on products or services available through Fidelity Institutional that would not be applicable to accounts held elsewhere. Our clients may also receive benefits from Fidelity Institutional in that they may receive a credit for transition related expenses when moving their assets to Fidelity Institutional. These are valuable services and benefit RCM. The fees RCM charges are not reduced by the value of Services received by Fidelity. These services create a conflict of interest in that they serve as an incentive to RCM and Clients for RCM and Clients to select Fidelity for custodial, brokerage and other services.

Clients directing us to manage assets with a specific broker-dealer have the sole responsibility for negotiating commission rates and other transaction costs with the broker-dealer. If a client selects a specific broker, we will not be required to effect any transaction through the specified broker if we reasonably believe that to do so may result in a breach of our fiduciary duties. You are advised that by instructing us to execute all transactions on behalf of your account through the specified broker, a disparity may exist between the commissions borne by your account and the commissions borne by our other clients that do not direct us to use a specified broker. You may also not necessarily obtain commission rates and execution as favorable as those that would be obtained if we were able to place transactions with other broker-dealers. You also may forego benefits that we may be able to obtain for our clients through negotiating volume discounts or block trades.

We may “bunch” buy or sell orders for two or more clients into a single large order, and place the bunched order with a single broker or dealer for execution. We are not obligated to place all transactions on a “bunched” basis. When determining whether to “bunch” orders, we rely on the judgment of the Investment Committee as to what course of action is likely to be fair and in the best interests of the relevant accounts on an overall basis. That is, we seek to avoid putting any client account at an advantage or disadvantage compared to our other client accounts that are buying or selling the same security.

Orders of two or more clients may be bunched only if we have determined, on an individual basis that the securities order is:

1. In the best interests of each client participating in the order;
2. Consistent with our duty to obtain best execution; and
3. Consistent with the terms of the investment Advisory agreement of each participating client.

Where conducting a block trade, we will determine the accounts that will participate, and the specific allocations in advance of the transaction. If the entire order is filled, you will receive your portion of the allocation specified on the trade ticket. All allocations are prior to the close of business on trade date. Client accounts participating in the transaction will receive the weighted average price of the security and will incur a pro-rata share of the transaction cost. If part of the order is unfilled, the allocation is based on a pro-rata share per client.

Our books and records separately reflect, for each client for whom an order is bunched, the securities held by, purchased, and sold for that client.

Item 13 Review of Accounts

The underlying securities within our portfolios are regularly monitored by Michael Ross. Accounts are reviewed quarterly at a minimum and will typically be reviewed much more frequently on an ad-hoc basis. Clients are provided with transaction confirmation notices and monthly summary account statements directly from the custodians of their assets. In addition to the monthly statements and confirmations you receive, Crow Creek Wealth may provide you with performance reports quarterly.

Item 14 Client Referrals and Other Compensation

We receive an economic benefit from Schwab in the form of the support products and services it makes available to us and other independent investment advisors whose clients maintain their accounts at Schwab. In addition, Schwab has also agreed to pay for certain products and services for which we would otherwise have to pay once the value of our clients’ assets in accounts at Schwab reaches a certain amount. These products and services, how they benefit us, and the related conflicts of interest are described in Item 12- Brokerage Practices.

Item 15 Custody

All Client account assets are held by a qualified custodian. Under government regulations, we are deemed to have custody of your assets in that we have the ability to instruct your custodian to deduct our advisory fees directly from your account (or if you grant us authority to move your money to a third party’s account). The custodian Figure 1 maintains actual custody of your assets.

You will receive account statements from the custodian at least quarterly. They will be sent to the email or postal mailing address you provided to your custodian. You should carefully review those statements promptly when you receive them. We also urge you to compare the account statement you receive from your qualified custodian with any statements provided by us.

Item 16 Investment Discretion

Crow Creek Wealth provides investment advisory services on a discretionary basis to clients. Clients hire Crow Creek Wealth because they want a portfolio managed based on the principles discussed in this document. Prior to engaging Crow Creek Wealth to provide investment advisory services, clients enter into a written Agreement with Crow Creek Wealth that sets forth the scope of its discretion.

Clients will also execute any and all documents required by the Custodian to authorize and enable Crow Creek Wealth, in its sole discretion, without prior consultation with or ratification by you, to purchase, sell or exchange securities in and for your account. We are authorized, in our discretion and without prior consultation with you to (1) buy, sell, exchange and trade any security and (2) determine the amount of securities to be bought or sold and (3) place orders with the custodian. Any limitations to such authority will be communicated by you to us in writing.

Item 17 Voting Client Securities

We do not vote proxies on your behalf. You retain that right unless you make other arrangements with the custodian of your assets. You will receive proxies or other solicitations directly from the custodian of your assets. You may contact us with questions about proxies.

Item 18 Financial Information

Crow Creek Wealth has never filed for bankruptcy and is not aware of any financial condition that is expected to impair its ability to meet contractual commitments to client accounts.

We do not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance.

Supplementary Brochure

Part 2B of Form ADV

Michael Ross

RCM Investments d/b/a

Crow Creek Wealth

CRD# 2664674

415-367-4200

Date: January 24, 2023

Item 1 Cover Page

This brochure supplement provides information about Michael Ross that supplements Crow Creek Wealth's \ disclosure brochure. You should have received a copy of that brochure. Please contact us at (801) 221-7923 if you did not receive our brochure or if you have any questions about the contents of this supplement.

Additional Information about Michael Ross is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Educational and Business Experience

Name: Michael L. Ross **Year of Birth:** 1972

Educational Background:

Mr. Ross graduated summa cum laude from California Coast University with a bachelors degree in Business Administration. He also studied financial planning through Northwestern University to obtain his CFP® credentials.

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP®(with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning.

- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 7 hours in one day, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances.
- Experience – Because CFP® certification indicates to the public a candidate’s ability to provide financial planning without supervision, CFP Board requires each candidate to have 6,000 hours of experience through the Standard Pathway, or 4,000 hours of experience through the Apprenticeship pathway that meets additional requirements. Qualifying experience may be acquired through a variety of activities and professional settings including personal delivery, supervision, direct support, indirect support or teaching.
- Ethics – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field.
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Mr. Ross also holds the Certified Wealth Strategist designation. A Certified Wealth Strategist® receives training specifically focused on advising higher net worth individuals (typically those with \$1 million or more in liquid assets).

To become a CWS, an individual must have three years of experience as a wealth manager and a four-year degree from an accredited school or significant years of client facing experience. After completing instructor-led training sessions, ten exams and a capstone project, an official CWS designation is awarded, and credentials can be verified online.

CWS’ have a unique perspective on how to collaborate with clients and their financial influencers to work effectively with complex client issues.

Business Background:

Prior to forming his own investment advisory firm, Crow Creek Wealth, LLC in 2019, Mr. Ross served as Wealth Management Adviser for Fidelity Investments beginning in March 2015. Prior to that position, Mr. Ross had worked in various other roles within Fidelity Investments (including with Strategic Advisers, LLC, Fidelity Personal and Workplace Advisors, Fidelity Investments Institutional Services Company, Inc., affiliates of Fidelity Investments) since 1995, including Retirement Planning Consultant, Vice President, Financial Planning Consultant, Account Executive, and Senior Account Executive. In 2022, Mr. Ross took his advisory firm’s activities to Riggs Capital Management, LLC, where he serves as a Wealth Manager. Mr. Ross has specialized in managing relationships with high net worth clients and helping them address their investment needs. More information is provided below.

May 2022- Present, Riggs Capital Management, LLC, DBA Crow Creek Wealth, American Fork, UT, Wealth Manager

April 2019 – May 2022, Crow Creek Wealth, San Ramon, CA, Wealth Manager

July 2018 – April 2019, Fidelity Personal and Workplace Advisors, Boston, MA, RPG Telephone Representative

September 1995 – April 2019, Fidelity Investments Institutional Service Company, Inc., Salt Lake City, UT, Wealth manager

March 2004 – July 2018, Strategic Advisors, Inc., Salt Lake City, UT, RPG telephone Representative

Item 3 Disciplinary Information

There are no legal or disciplinary events that are material to your evaluation of Mr. Ross or his integrity.

Item 4 Other Business Activities

Mr. Ross has other business activities.

Item 5 Additional Compensation

Mr. Ross does not receive any additional compensation outside of his compensation as an investment adviser representative.

Item 6 Supervision

Krey Thompson is the person responsible for supervision of our associates. He supervises the representatives by reviewing their personal investment trades and their investment advisory business. He may be reached at (801) 221-7923 with any questions or concerns.