

Item 1 Cover Page

Part 2A of Form ADV  
Firm Brochure  
Riggs Capital Management, LLC  
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Date: March 25, 2024

This brochure provides information about the qualifications and business practices of Riggs Capital Management, LLC. If you have any questions about the contents of this brochure, please contact us at (801) 221-7923 or via email at [craig@rcminvestments.com](mailto:craig@rcminvestments.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 Riggs Capital Management, LLC is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) . 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 since our last annual amendment from January 2023.

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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 investment management, financial planning services, and employer sponsored qualified retirement plan services and have been offering investment advisory services since 2002. Our services offered as Crow Creek Wealth 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**

#### ***Investment Management Services***

Our investment management service provides discretionary continuous investment advice based on your objectives, needs, risk tolerance, and style of desired management, utilizing various securities products including: registered investment companies (“mutual funds”), exchange-traded funds (“ETF’s”), equities, bonds, and/or other securities in association with the investment service selected by you. We will custom tailor an investment portfolio specifically designed for you based on the style of management you select.

The process begins when you fill out a “Confidential Investor Questionnaire” (“CIQ”). This will help you clarify your financial objectives and goals, establish your tolerance to risk, and identify your most comfortable style of management. The CIQ is used by our firm as the primary reference for managing your portfolio. You may also indicate any special instructions or limits that you wish us to follow in managing your assets.

Based on our analysis of your CIQ, we will provide you with a suggested portfolio investment allocation that incorporates our specifically recommended risk level, stock-to-bond ratio, and many other key statistics revolving around our target allocation for you. The specific selections within the mutual funds, exchange- traded funds, equities, bonds, and/or other securities represent asset classes suited to your individual risk tolerance, goals, and management style. The specific percentages allocated to each asset class may vary due to the nature of asset performance and/or the investment management service selected.

Through our regular monitoring of capital markets, asset class fundamentals, relative strength and market risk factors, we may change your portfolio asset mix in order to help you meet your objectives. It is our intent to maintain a risk exposure commensurate with your objectives, target stock/bond ratio and risk tolerance score. As we manage your account, your actual stock/bond ratio will deviate around your target stock/bond ratio.

To help us provide accurate and timely management of your invested assets, we may ask that you establish a custodial account with a designated custodian. However, assets may be held at a number of qualified custodians, and you are under no obligation to follow our advice regarding a specific custodian. Your custodian maintains the underlying records for the assets held in your account. We will not serve as custodian for your managed assets. In most instances, you will be solely responsible for paying all the fees or charges of the custodian.

Securities or monies may be added to or withdrawn from the managed assets at any time; however you must provide us with written notice of any such additions or withdrawals. We are not responsible for accurate reporting if you fail to provide us accurate information. We strive to maintain your account data as accurate as possible; however, we rely on accurate reporting provided to us by your custodian through electronic or other means. You must promptly submit to us in writing any changes to your CIQ, or any changes to any information you provide us regarding the management of your assets.

Maintaining proper records and documentation regarding your account is important to us. You will be able to access your custodian’s web site or other automated system, to retrieve your current account information upon demand. As a client of RCM, you will be able to receive a quarterly statement from us. In addition, we are available to answer any questions regarding your account at (800) 575-2717.

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

### ***Description of Program***

Customized Wealth Management – The Customized Wealth Management program is a strategy in which you will be invested in multiple investments through a single investment platform at a designated custodian. The program utilizes a dynamic asset allocation strategy, based on a fundamental and relative strength analysis of the major asset classes, and regular quantitative and qualitative analysis. Clients may impose restrictions limiting the available selection of investments to be used by this program. This program may be best suited for clients wishing to impose certain restrictions on the investments be used in their portfolio. Investment decisions will then be made according to your objectives determined from your CIQ.

### ***Financial Planning Services***

We offer a variety of financial planning services, principally advisory in nature, regarding the management of their financial resources, based upon an analysis of your needs. Generally, such financial planning services will involve preparing a financial program for you based on your financial circumstances and objectives. This information normally would cover present and anticipated assets and liabilities including insurance, savings, investments and anticipated retirement or other employee benefits.

The program developed for you will usually include general recommendations for a course of action or specific actions to be taken by you. For example, recommendations may be made that you obtain insurance or revise existing coverage, establish an individual retirement account, increase or decrease funds held in savings accounts or invest funds in securities. We may also create a cash flow analysis or work with and advise you as to the rearrangement of cash flow in order to fund certain long term objectives such as buying a house, planning for college, retirement, etc.

### ***Employer Sponsored Qualified Retirement Plan Services***

We have developed a program to provide investment advisory services to retirement plans. Our services include Investment Fund Services, and Educational Services.

- Providing the Plan Sponsor with a list of investment fund options from the universe of investment funds available to Plan Participants to direct their own investments.
- Providing the Plan Sponsor with a list of investment fund options from the universe of investment funds available to the Plan Participants to direct their own investments based on the Plan's Investment Policy Statement

Our Educational Services include education of Plan Participants as to the investment alternatives available under the terms of the Plan and distribution planning upon retirement or other termination of employment.

In certain situations, we may refer Employer Sponsored Qualified Retirement Plans to an unaffiliated third party.

### ***Terminating our Services***

We may terminate our investment advisory agreement with you at any time by providing you with written notice. Likewise, you may terminate the advisory agreement at any time by providing us with written notice.

If the advisory agreement is terminated within (5) five business days from the date of inception, all fees paid in advance will be refunded promptly. Should the advisory agreement be terminated at any other time, you will receive a pro-rata refund of all prepaid fees. If you are billed in arrears for our services, any outstanding amounts owed to us shall become immediately due and payable upon termination.

Upon termination of our investment management services, we will have no obligation or authority to recommend or take any action with regard to the previously managed assets. You will bear the sole responsibility to work with your custodian for proper liquidation of your assets.

## **Item 5 Fees and Compensation**

### ***Fees for Investment Management Services***

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

<b>Managed Assets</b>	<b>Annual Percentage Rate</b>
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.

Under some advisory agreements, fees may be determined and payable quarterly, in arrears, based on account balances as of the end of each calendar quarter. In other advisory agreements, we may charge an hourly fee, instead of a management fee based on assets under management. Please refer to your advisory agreement to determine the manner your advisory fees will be billed. In any partial advisory fee cycle, the advisory fee will be pro-rated based on the number of days the assets are under management during the particular advisory fee period. Fees will be due and payable once RCM takes over management of your account(s).

#### ***Fees for Financial Planning Services***

For Financial Planning services, we will charge you a fee as agreed upon at the time of service. The fee will be charged on a fixed for hourly fee basis. The fixed fee ranges from \$500 to \$5,000, and is negotiable. Fees will vary based upon the complexity of the plan. We track our hours when developing plans for our clients. If our hourly fee, based on \$250 per hour, is less than what is quoted we will charge the lesser of the two fees. There is a minimum charge of \$500 per plan. These fees are charged when the plan is complete and fees are due and payable at that time.

#### ***Fees for Employer Sponsored Qualified Retirement Plan Services***

For Employer Sponsored Qualified Retirement Plan Services, we receive investment advisory fees paid quarterly in arrears based upon the previous quarter's ending balance of the assets invested in Model Portfolios and Investment Funds of the Plan. The Investment Advisory Fees will be deducted from the Plan assets and then be paid to the Advisor. All fees and charges are noted on the Plan's custodial account agreements. In some cases, we refer employer sponsored qualified retirement plans to a third party for investment management services. In such cases, we may receive a percentage of the fees charged to the plan or plan sponsor for these services. Any such fees are disclosed to the client, in writing, at the time of the referral.

<b>Assets in Plan</b>	<b>Annual Percentage Rate</b>
\$0.00 to \$3,000,000	0.50%
\$3,000,000 to \$6,000,000	0.40%
\$6,000,000 to \$10,000,000	0.30%
\$10,000,000 or more	0.20%
All fees are negotiable	

#### ***Additional Considerations Regarding Fees and Expenses***

The advisory fees represented in the standard fee schedules do not reflect operating expenses and other costs incurred by mutual funds, sub-accounts, exchange-traded funds, separate account managers of equities and/or bonds, and these fees and expenses are ultimately borne by you, as the shareholder.

The advisory fees represented are also in addition to any transaction fees charged when trading mutual funds, sub-accounts, exchange-traded funds, and by separate account managers of stocks or bonds. You are responsible for paying any transaction fees generated by the purchase or sell of any of these securities. We do not receive any compensation from transaction fees charged by the custodian, and efforts are made to minimize transaction fees when possible.

Mutual funds and variable annuities may also charge back-end fees, also known as contingent deferred sales charges, on withdrawals within a pre-specified period of time. We are not responsible for any of these charges incurred by your managed portfolio.

We advise you to carefully review your custody agreement with your custodian as there may be custodial fees and other service fees charged to you by your custodian. In addition, a complete description of all fees and expenses charged by a particular security, such as a mutual fund, are in the relevant prospectuses.

You may request that related accounts be combined in order to meet break points and reduce the advisory fee charged. We reserve the right to waive the fee on certain accounts such as employee accounts and personal accounts of individual solicitors who refer business to us. The standard fee schedules and minimum account sizes indicated in the programs below are negotiable and as a result, clients with similar assets may have differing fee schedules. Clients who negotiate a flat fee schedule may pay a higher fee than those who pay under a tiered schedule, depending on asset levels.

We reserve the right not to increase the fee percentage based upon asset levels during a given quarter under a tiered schedule when asset values have declined. When RCM does so, this will be to the advantage of any Client whose account would have been impacted by market loss.

Similar investment advisory services may be available from other investment advisors for a lower fee.

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

We do not accept performance-based fees.

## **Item 7 Types of Clients**

We typically work with individuals, retirement accounts, plan sponsors, high net worth individuals, and other businesses. Our minimum account size is \$500,000. We sometimes accept smaller accounts at our discretion.

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

### ***Methods of Analysis***

We advise individual clients regarding the investment management of mutual funds, exchange-traded funds, variable annuities, variable life products, and separate account managers of equities and bonds. Under some circumstances, we may advise clients regarding other securities, such as individual stocks, interval funds, or closed-end funds. Investment strategies and policies as well as risks are included and described in the relevant prospectus and registration statement. We use the following methods of security analysis:

- Charting - (analysis performed using patterns to identify current trends and trend reversals to forecast the direction of prices)
- Fundamental - (analysis performed on historical and present data, with the goal of making financial forecasts)
- Technical – (analysis performed on historical and present data, focusing on price and trade volume, to forecast the direction of prices)
- Cyclical – (analysis performed on historical relationships between price and market trends, to forecast the direction of prices)

We use the following investment strategies when implementing investment advice given to clients:

- Long Term Purchases (securities held at least a year)
- Short Term Purchases (securities sold within a year)

Every method of analysis has its own inherent risks. To perform an accurate market analysis the Registrant must have access to current/new market information. We have no control over the dissemination rate of market information; therefore, without our knowledge, certain analyses may be compiled with outdated market information, severely limiting the value of our analysis. Furthermore, an accurate market analysis can only produce a forecast of the direction of market values. There can be no assurances that a forecasted change in market value will materialize into actionable and/or profitable investment opportunities.

The Registrant's primary investment strategies - Long Term Purchases and Short Term Purchases are fundamental investment strategies. However, every investment strategy has its own inherent risks and limitations. For example, longer term investment strategies require a longer investment time period to allow for the strategy to potentially develop. Shorter term investment strategies require a shorter investment time period to potentially develop but, as a result of more frequent trading, may incur higher transactional costs when compared to a longer term investment strategy.

Interval funds have unique risks, in that they do not provide daily liquidity but rather periodically offer to repurchase a certain percentage of shares. Clients may request limitations on the amount of investments made into interval funds or may request that their account not hold any interval funds.

Assets in our Customized Wealth Management are managed using a dynamic asset allocation strategy. Client portfolios are diversified and allocated based on the current state of the capital markets, asset class fundamentals and the relative strength of the underlying investment options, as determined by our analysis. We utilize an on-going risk analysis of the major stock and bond asset classes, as well as the broader financial markets, in determining the risk/reward scenario in the marketplace. The more positive these indicators, the less likely we will reallocate to lower risk asset classes or deviate from your target stock-to-bond allocation.

### *Sources of Information*

We have an "Investment Committee" which meets on an on-going basis to review and discuss the state of the economy and the capital markets, in general. Members of RCM's Investment Committee must hold either the Chartered Financial Analyst designation ("CFA"), the Certified Financial Planner designation ("CFP®"), or a Master's Degree in a related field. Members of this committee are responsible for investment decision-making recommendations, and advises on the general state of the market and the economy. Currently, Jay A. Riggs serves as the Chairman of the Investment Committee. Members of the Investment Committee also include the following: James Houston, CFP® and Cameron Foster, CFP®.

We use data retrieved from companies via electronic sources when managing your account. We may also utilize investment research, portfolio models, or investment advice from unaffiliated third parties. All expenses incurred from these third parties shall be paid by us.

### *Investment Strategies*

Our asset allocation strategies seek to be invested in the asset classes and investments that are exhibiting the strongest characteristics, fundamentals, momentum, and market leadership during certain time frames and overweight and underweight client assets according to the client's individual objectives and risk tolerance. At times, we may also invest in areas that are out of favor, or where we perceive relative value. There may be times when we increase positions in less volatile instruments such as money market funds, bond funds, or lower risk equity funds. Doing so may cause a deviation from your target stock-to-bond allocation. In addition to the investment strategies discussed above, we may also implement and/or recommend options transactions. Option transactions have a high level of inherent risk. (See discussion below).

The use of options transactions as an investment strategy may involve a high level of inherent risk. Option transactions establish a contract between two parties concerning the buying or selling of an asset at a predetermined price during a specific period of time. During the term of the option contract, the buyer of the option gains the right to demand fulfillment by the seller. Fulfillment may take the form of either selling or purchasing a security depending upon the nature of the option contract. Generally, the purchase or the recommendation to purchase an option contract by the Registrant shall be with the intent of producing income or offsetting/"hedging" a potential market risk in a client's portfolio. Although the intent of the options-related transactions that may be implemented is to produce income or hedge against principal risk, options may produce principal volatility and/or risk. Thus, a client must be willing to accept these enhanced volatility and principal risks associated with such strategies. In light of these enhanced risks, client may direct us, in writing, not to employ any or all such strategies for his/her/their/its accounts.



### ***Risk of Loss***

You should know that it is impossible to predict the future; there is no assurance that we will attain your objectives or that any investment recommendation will be profitable. You may lose all or some of your money. Investing involves risk that you should be prepared to bear. Clients in the same investment program may have differing performance depending upon the individual objectives and risk tolerance of each client. Should you wish to change investment programs, you must notify RCM in writing.

### **Item 9 Disciplinary Information**

Neither the Firm nor any of our management persons have been involved in any events that are material to a client's or prospective client's evaluation of the Firm or the integrity of its management.

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

Some of our Advisory Representatives are also licensed as insurance agents. In this capacity, they earn commissions for the sale of insurance or annuity products in addition to any fees they may earn for providing investment advice.

These activities create a conflict of interest in that our Advisory Representatives have financial incentives to recommend additional products or services to you. We address these conflicts by doing the following:

We must disclose any potential or actual conflicts of interest when dealing with clients.

We are subject to the following specific obligations when dealing with clients:

- The duty to have a reasonable, independent basis for its investment advice;
- The duty to ensure that investment advice is suitable to meeting the client's individual objectives, needs, and circumstances; and,
- A duty to be loyal to clients.

Clients always have the option of purchasing recommended investment and insurance products through other broker-dealers.

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

Associated persons may buy or sell for their own accounts the same securities recommended to you. They may do so at the same time as they, or a related person, buy or sell the same securities for their own account. Associated persons seek to ensure that they do not personally benefit from the short-term market effects of their recommendations to you. We request information about all of our associate's transactions and monitor them for any wrongdoing.

Associated persons are aware of the rules regarding material non-public information and insider trading. Associated persons may also buy or sell a specific security for their own account based on personal investment considerations, which the Advisor does not deem appropriate to buy or sell for clients.

We have adopted a Code of Ethics to instruct its personnel in their ethical obligations and to provide rules for their personal securities transactions. The Firm and our personnel owe a duty of loyalty, fairness and good faith to their clients, and the obligation to adhere not only to the specific provisions of the code but also to the general principles that guide the Code. The Code covers a range of topics including general ethical principles, reporting personal securities trading, exceptions to reporting securities trading, reportable securities, initial public offerings and private placements, reporting ethical violations, distribution of the Code, review and enforcement processes, amendments to Form ADV and supervisory procedures. We will provide a copy of the Code to any client or prospective Client upon request.

### **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**

### ***Review of Accounts***

A Partner or Investment Committee Member reviews each new prospective client folder prior to initial trading, for the appropriateness and suitability of the recommendations. The Investment Committee monitors all account positions for asset class performance and analyzes market conditions on a regular basis. The fundamentals, relative strength, and price movement of each asset class is reviewed and client allocations are weighted to best meet individual risk tolerances and objectives based on the client’s selected investment program. During the on-going analysis of market



and economic indicators, should it determine major risk-altering portfolio movements might be necessary, the Investment Committee will determine an appropriate course of action. The Investment Committee is responsible for monitoring the investment allocations on a regular basis.

We communicate with clients at least annually (or as often as the client prefers) to discuss their portfolio and our financial markets views. We also ask the client to keep their financial representative at RCM Investments updated with any changes in their financial situation and/or risk tolerance that may warrant a change to their investment portfolio. If any information has changed, the client has the obligation to advise RCM of the changes immediately. In most cases, the client will communicate with a member of RCM, and in other cases, it may be with a third-party solicitor working with RCM. Together, the client and their designated financial advisor will determine whether any change in investment objectives or risk tolerance warrants a change in the criteria used to manage client assets. At least annually (or as often as the client prefers), RCM reviews with the client confidential client information that describes the client's current personal and investment information. We use this information as the primary reference for managing a client's account. If the client's current information remains current, no further action is required.

For all investment services, factors that may affect portfolio weightings include changes in client asset levels, changes in asset class fundamentals, relative strength of the assets, economic and/or financial market changes, as determined by the Investment Committee.

### ***Regular Reports***

We will provide advisory clients with a quarterly report. In some circumstances, this quarterly statement may be provided to you by a third party under contract with us to provide statements to our clients or provided to you directly by the custodian. Under circumstances where the client has expressly consented, statements and other client notifications may be sent to clients via electronic means (such as e-mail), or posted to a secure web site for client access. In many circumstances you may receive a quarterly statement from us in addition to quarterly (or more frequent) reports provided by your custodian.

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

We may enter into marketing arrangements with referring parties, called solicitors. Through these arrangements, we may pay a cash referral fee to the representative and/or their firm based upon a percentage of our advisory fee, or a fixed dollar fee based upon each referral received. In connection with these arrangements, we will comply with Rule 206(4)-3 under the Advisers Act. The referral fee is paid pursuant to a written agreement, which is retained by both your representative and us. This information is disclosed to you prior to or at the time of entering into an investment advisory agreement with us.

We may pay a portion of the advisory fee to other affiliated or non-affiliated parties who assist with certain administrative tasks associated with the management of your account.

We may reimburse unaffiliated third parties for the costs of attending training seminars for the purpose of learning about our advisory business. We also may pay for costs associated with client seminars done for the purpose of acquiring or retaining clients for us.

## **Item 15 Custody**

We have custody of client funds in that we deduct fees from your accounts. The custodian of your assets sends quarterly statements directly to you. You should carefully review those statements.

We also send performance statements to you, and we urge you to compare the account statements you receive from the custodian to those you receive from us.

## **Item 16 Investment Discretion**

We request that you give us discretionary authority to manage your accounts by signing a written power of attorney. You may place reasonable restrictions on the types of securities or on specific securities that we may purchase or sell.

## Item 17 Voting Client Securities

With very limited exceptions, it is our general policy to not receive proxies for securities held in your accounts. It is our general policy not to vote, nor give any advice how to vote, proxies for securities held in your account(s). In nearly all cases, proxies for securities held in your accounts will be received by you directly from the custodian of your assets, or will be handled as otherwise agreed between you and the custodian.

However, in certain circumstances based on our discretion and your request, we may agree to vote proxies on your behalf. Should this be the case, we have adopted and implemented policies and procedures that we believe are reasonably designed to ensure that proxies are voted in the best interest of clients, in accordance with our fiduciary duties and SEC Rule 206(4)-6 under the Investment Advisers Act of 1940 ("Advisers Act").

Clients may request a copy of RCM's Proxy Voting Policies and Procedures by contacting a member of the RCM Team at (800) 575-2717.

## Item 18 Financial Information

We have no financial condition that is likely to impair our ability to provide services to you.

Please note, due to economic uncertainties surrounding the COVID-19 pandemic, RCM Investments, and some of its advisory representatives, applied for and received loans through the Paycheck Protection Program. The loans are intended to be used for payroll and other expenses which entitle the loans to be forgiven. We do not anticipate any financial hardship in repaying the loans should we use the funds for other non-forgivable purposes.

## Brochure Supplement

### Item 1 Cover Page

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Date: February 13, 2024

This brochure supplement provides information about Jay A. Riggs, MBA; Craig L. Riggs; Cameron Foster CFP®, Krey Thompson; Sheila Johnston, CPA/PFS, CFP®; James Houston; and Dave Anderson that supplements our firm brochure. Please contact us at (800) 575-2717 if you did not receive Riggs Capital Management, LLC's brochure or if you have any questions about the contents of this supplement.

## Item 2 Educational Background and Business Experience

The following information is provided about the associates who provide advice to you.

JAY A. RIGGS, MBA: Year of Birth: 1971

Formal Education after high school:

Mr. Riggs graduated from Brigham Young University with a Bachelor of Science degree in Business Management with an emphasis in Finance. Mr. Riggs later received a Master's degree in Business Administration with an emphasis in Finance from the University of Utah.

Business Background for the preceding five years:

*President, Chief Investment Officer, Investment Advisor Representative of RCM (since 4/2002).* Mr. Riggs is the *Chairman of the Investment Committee* at RCM. Previously Mr. Riggs was the *Chief Investment Officer, Chairman of the Investment Committee, and Senior Vice President of Investments* of Clarke, Lanzen, Skalla (CLS) Investment Firm, Inc (from 3/2001 to 4/2002). He was also the *Co-Manager* for the Orbitex AdvisorOne Funds (3/2001 to 8/2002). Previously, Mr. Riggs was the *Senior Portfolio Manager and Vice President of Investments* with CLS (from 2000 to 3/2001). He was a *Portfolio Manager* with CLS' predecessor (from 1998 to 2000) and

Registered Representative of Orbitex Funds Distributor, Inc. (from 1998 to 4/2002). Previously, Mr. Riggs worked as a *Trader* and *Team Leader* for Fidelity Investments (from 1995 to 1998). Mr. Riggs was a *Registered Representative* of Emerson Equity LLC (10/2019 – 6/2020), DFIG Investments, Inc. (6/2017 – 10/2019); Orchard Securities, LLC (from 8/2016 – 6/2017); Triad Advisors, Inc. (from 3/2009 – 8/2016).

CRAIG L. RIGGS: Year of Birth: 1974

Formal Education after high school:

Mr. Riggs graduated from the University of Utah with a Bachelor of Science degree in Business Management.

Business Background for the preceding five years:

*Senior Vice President, Partner, Investment Advisor Representative* of RCM (since 1/2003). Previously, Mr. Riggs was a *Senior Financial Advisor* for Fidelity Investments (from 12/2000 to 1/2003). Prior to that, Mr. Riggs was a *Mutual Fund Specialist* with Fidelity Investments (8/1999 to 12/2000). Mr. Riggs was a *Registered Representative* of Fidelity Brokerage Services, LLC (from 8/1999 to 1/2003), Triad Advisors, Inc. from (02/2011-07/2016), Orchard Securities (8/2016 – 6/2017), DFIG Investments, Inc. (6/2017 – 10/2019), Emerson Equity LLC (10/2019 – 6/2020).

CAMERON W. FOSTER, CFP®: Year of Birth: 1975

Formal Education after high school:

Mr. Foster graduated from Westminster College with a Bachelor of Science degree in Finance. Mr. Foster is a Certified Financial Planner (CFP®).

Business Background for the preceding five years:

*Executive VP of Sales, Partner, Investment Advisor Representative* of RCM (since 3/2005). Previously, Mr. Foster was a *Senior Retirement Counselor* for Fidelity Investments (from 12/2002 to 3/2005). He was a *Sales Manager* for Future Business (from 1/2002 to 12/2002). Previously, Mr. Foster worked as an *Investment Advisor* for Goldman Sachs (from 8/2000 to 12/2001) and *Retirement Counselor* for Fidelity Investments (from 9/1997 to 8/2000). Mr. Foster was a registered representative of DFIG Investments, Inc. (from 7/2017 to 10/2019) and prior to this held the same registration with Triad Advisors, Inc. (from 8/2011 – 7/2016) and Orchard Securities (from 7/2016- 6/2017), DFIG Investments (from 6/2017 – 10/2019) and Emerson Equity LLC from (10/2019 – 2/2020). Mr. Foster is a member of the investment committee at RCM.

JAMES M. HOUSTON, CFP® Year of Birth: 1970

Formal Education after High School:

Mr. Houston graduated from Brigham Young University with a Bachelor of Science degree in Business Management with an emphasis in Finance. Mr. Houston is a Certified Financial Planner (CFP®).

Business Background for the preceding five years:

*Senior Vice President, Portfolio Manager* of RCM (since 3/2014)). Previously, Mr. Houston was a *Senior Vice President and Portfolio Manager* for Turnberry Financial Services (from 9/1996 to 2/2014). Mr. Houston was a *Registered Representative* of Triad Advisors, Inc. (5/2014 – 7/2016) and *Registered Representative* of DFIG Investments, Inc. (7/2017 -10/2019). Mr. Houston is a member of the investment committee at RCM.

KREY R. THOMPSON: Year of Birth: 1962

Formal Education after high school:

Mr. Thompson graduated from the University of Utah with a Bachelor of Arts degree in Psychology.

Business Background for the preceding five years:

*Chief Compliance Officer* of RCM (12/2016 - Present), *Investment Adviser Representative* of RCM (03/2020 – Present), *Chief Operations Officer* of RCM (since 03/2010). Previously, Mr. Thompson was a *Chief Operations Officer* for High Peaks Management (from 08/2007 to 02/2010). Prior to that, Mr. Thompson was an *Operations Manager* with Sherwood Financial (from 10/2002 to 08/2007). Mr. Thompson was also a *Registered Representative* of Midland National Life and Walnut Street Securities (from 1999 to 2002) and with Sammons

Securities (from 2002 to 2003) , Orchard Securities, LLC (from 10/2016 – 6/2017) and DFPG Investments, Inc. (7/2017- 10/2019).

SHEILA A. JOHNSTON, CPA/PFS, CFP®: Year of Birth: 1954

Formal Education after high school

Ms. Johnston has a Master's of Taxation from the University of Cincinnati and a Master's of Business Administration from the University of Louisville.

Business Background for the preceding five years

*Investment Adviser Representative* of RCM (since 04/2008), *Tenured Faculty Member* of University of Louisville (Since 01/1991), and *Certified Public Accountant* (since 01/1991) Previously, Ms. Johnston was an *Investment Advisory Representative* of HD Vest Advisory Services (from 09/2005 to 04/2008) and *Registered Representative* of HD Vest (from 02/2005 to 04/2008), and an *Investment Advisor Representative* of both Equity Resources, LLC and QA3 Financial, LLC (from 2/2001 to 2/2005) and *Registered Representative* of QA3 Financial Corp (from 2/2001 to 2/2005). *Registered Representative* of Triad Advisors, Inc. (09/2013-07/2016). *Registered Representative* of DFPG Investments, Inc. (7/2017 – 10/2019).

DAVID P. ANDERSON, CFP® Year of Birth: 1973

Formal Education after High School:

Mr. Anderson is a Certified Financial Planner (CFP®).

Business Background for the preceding five years

Investment Adviser Representative of RCM (since 1/2015). Previously, Mr. Anderson was a registered representative with Beneficial Investment Services, Inc., from 10-2007 through 1-2010. He has sold insurance through Certified Financial Group since 3/2008.

### *Professional Designations*

Our associates hold a variety of professional designations. A description of these designations is included below:

MBA: Masters in Business Administration. An advanced degree achieved through a University

CPA: Certified Public Accountant. An individual who has passed the uniform CPA examination administered by the American Institute Of Certified Public Accountants, and who has received state certification to practice accounting. To achieve this designation, an individual usually has to complete 5 years of education, and a certain degree of work experience. Additionally, once an individual becomes a CPA, they typically must complete a certain number of hours of continuing education each year.

PFS: Personal Financial Specialist. A Certified Public Accountant who also offers financial planning services. Personal Financial Specialists must complete an exam, have at least three years of financial planning experience, and submit recommendations before certification. The title is authorized by the American Institute of Certified Public Accountants.

CFP® : Certified Financial Planner. A title conveyed by the International Board of Standards and Practices for Certified Financial Planners. A Certified Financial Planner must pass a series of exams and enroll in ongoing education classes, as well as have obtained a Bachelor's Degree from an accredited institution. Knowledge of estate planning, tax preparation, insurance, and investing is required, as is at least three years of work experience in a related field.

## **Item 3      Disciplinary Information**

We have no disciplinary information to share about our associates.

## **Item 4      Other Business Activities**

Cameron Foster, Tony Riggs and Craig Riggs are members of Grove Creek Consulting, LLC. Grove Creek Consulting, LLC is in the business of providing strategic advice and counsel on various joint venture and partnership opportunities, which includes facilitating and providing financial, real estate and development-opportunity due diligence, general review of corporate structure and opportunities, and analysis of the foregoing, and consultant has developed relationships with network partners in the industry associated with a company's strategic goals. This may take up to 5 hours per week of their time.

## **Item 5      Additional Compensation**

There are no such issues to be disclosed.

## **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.