

Part 2A of Form ADV: *Firm Brochure*

**Know Your Options, LLC
DBA
RCM Wealth Advisors**

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This brochure provides information about the qualifications and business practices of RCM Wealth Advisors. If you have any questions about the contents of this brochure, please contact us at 866-903-1822 or twebb@rcmfs.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. Registration as an investment adviser does not imply a certain level of skill or training. Additional information about RCM Wealth Advisors also is available on the SEC's website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. Our firm's CRD number is 153641.

Item 2 Material Changes

Since our last filing in September, 2023 there have been no material changes.

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Item 4 Advisory Business

Know Your Options, LLC DBA RCM Wealth Advisors is an SEC - registered investment adviser. Our principal office and place of business is located in Chicago, Illinois.

Know Your Options Inc., an Illinois corporation, was first registered as an Illinois RIA in May of 2010. Know Your Options Inc. was closed in December of 2012 and Know Your Options LLC, an Illinois limited liability company was formed in December 2012 d/b/a RCM Wealth Advisors.

Listed below are the firm's principal shareholders (i.e., those individuals and/or entities controlling 25% or more of this company).

- Robert Schwartz, Member
- Tim Webb, Chief Investment Officer, Chief Compliance Officer

RCM Wealth Advisors offers the following advisory services to our clients:

INVESTMENT PORTFOLIO MANAGEMENT

Our firm provides continuous advice to a client regarding the investment of client funds based on the individual needs of the client. Through personal discussions in which goals and objectives based on a client's particular circumstances are established, we develop a client's personal investment policy and create and manage a portfolio based on that policy. During our data-gathering process, we determine the client's individual objectives, time horizons, risk tolerance, and liquidity needs. As appropriate, we also review and discuss a client's prior investment history, as well as family composition and background.

We manage these advisory accounts on a discretionary or non-discretionary basis. Account supervision is guided by the client's stated objectives (i.e., capital appreciation, growth, income, or growth and income), as well as tax considerations. Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors.

Our investment recommendations are not limited to any specific product or service offered by a broker-dealer or insurance company and will generally include advice regarding the following securities:

- Exchange-listed securities
- Securities traded over-the-counter
- Corporate debt securities (other than commercial paper)
- Certificates of deposit
- Municipal securities
- United States governmental securities
- Options contracts on securities
- Options contracts on commodities

Because some types of investments involve certain additional degrees of risk, they will only be implemented/recommended when consistent with the client's stated investment objectives, tolerance for risk, liquidity and suitability.

RCM Wealth Advisors does not participate in wrap fee programs.

FINANCIAL PLANNING

RCM Wealth Advisors is available to provide Financial Planning Services. We can tailor our services as desired by the client. These services are available to all clients but RCM Wealth Advisors does not require clients to engage in these services. Financial Planning Services may be comprehensive in nature or may only focus on certain components of planning needs as directed by the client.

Financial Planning and advice may be provided on general investment information, investment research, investment planning and asset allocation, risk management, employment severance, general estate planning, retirement planning, educational funding, goal setting and budgetary planning, or other needs as identified by the client. Where Financial Planning Services only focus on certain areas of client interests, needs or are otherwise limited, clients must understand that a client's overall financial and investment needs and objectives may not be considered as a result of time and/or service restraints placed on the Adviser's services.

Financial planning is a comprehensive evaluation of a client's current and future financial state by using currently known variables to predict future cash flows, asset values and withdrawal plans. Through the financial planning process, all questions, information, and analyses are considered as they impact and are impacted by the financial and life situation of the client. Clients purchasing this service receive a written report which provides the client with a detailed financial plan designed to assist the client achieve his or her financial goals and objectives.

We gather required information through in-depth personal interviews. Information gathered includes the client's current financial status, tax status, future goals, returns objectives and attitudes towards risk. We carefully review documents supplied by the client, including a questionnaire completed by the client, and prepare a written report. Implementation of financial plan recommendations is entirely at the client's discretion.

Financial Planning recommendations are not limited to any specific product or service offered by a broker-dealer or insurance company. All recommendations are of a generic nature.

Plan documents will be delivered to clients within six months of the receipt of all required information by the client, provided that all information needed to prepare the financial plan has been promptly provided.

The advice given on general investment information may include any one or all of the following mentioned in the previous paragraph:

1. **Gathering and drafting of general investment information:** This service involves spreadsheet analysis, reports, and consultations. This includes the formation of financial statements which may include a financial summary and cash flow statement as well as an analysis of these items to evaluate the client's current situation and to help build a financial roadmap for the future. The Firm also may consolidate account information such as account titling, account numbers, cost basis, inception dates, market values, and interest/dividend earnings where such information is available.
2. **Investment Research:** This service involves providing clients with spreadsheets, analysis, and reports on prior investments and their current financial state. This also involves an analysis of the investment options available to the client and a report of those options that is informative to the client. The Firm has an Investment Policy Committee that conducts research on the market and the investment opportunities. This Committee meets once per week and determines the investment opportunities that are in the best interests of The Firm's clients. This service is on-going and the advisor will discuss investment research internally and will communicate this research to clients periodically.
3. **Financial and Asset Allocation:** This involves advice with respect to asset allocation and investment income accumulation techniques. Evaluations are made of existing and, when applicable, potential investments in terms of their economic and tax characteristics as well as their suitability for meeting client's objectives. Tax consequences and their implications are identified and evaluated in general terms.
4. **Risk Management/Insurance Planning:** This includes risk management associated with advisory recommendations based on the combination of insurance types that best meet a client's specific needs (i.e., life, health, disability, home, auto, long-term care, and others as appropriate).
5. **Employment Severance:** This service involved rendering advice with respect to insurance options available for key personnel in an organization or with respect to a client's severance package from employment. The Firm evaluates severance offers and assists corporate clients with risk management for employee severance. Legal, economic, and tax consequences are considered and evaluated in general terms when providing advice on employment severance.
6. **General Estate Planning:** This service generally involves a review of assets and liabilities, the titling of assets and the consideration of trusts. However, the Firm may provide advice with respect to property ownership, distribution strategies, estate tax reduction, and tax payment techniques as well as a discussion of gifts, trusts, etc. and the disposition of business interests. Tax consequences and their implications are identified and evaluated in general terms. The client's chosen licensed attorney must be used for evaluation and document creation.
7. **Retirement Planning:** This involves advice with respect to alternatives and techniques for accumulating wealth for retirement income or advice relative to

appropriate distribution of assets following retirement. Additionally, self-directed retirement assets are evaluated and, where appropriate, recommendations and assistance are provided. Tax consequences and their implications are identified and evaluated in general terms. The Firm is not engaged in rendering legal or accounting advice, has no lawyers or accountants on staff, and therefore refers all matters requiring legal or tax advice to the client's chosen and properly licensed professionals in these areas.

8. **Educational Funding:** This includes alternatives and strategies with respect to the complete or partial funding of college or other post-secondary education experience. Tax consequences and their implications are identified and evaluated in general terms.
9. **Goal Setting and Budgetary Planning:** As a result of performing some or all of the services listed in bullets 1 through 8, the Firm may be able to recommend strategies or methods for consolidating the client's financial situation in order for the client to manage their financial situation more easily and to obtain efficiency, cost savings, and diversification.

OTHER OUTSIDE ACTIVITIES

Investment Adviser Representatives and other related persons of our firm are licensed with the NFA and/or licensed agents for an insurance agency.

AMOUNT OF MANAGED ASSETS

As of 2/21/2024, we are actively managing \$96,900,000 of clients' assets on a discretionary basis plus \$157,920,000 of clients' assets on a non-discretionary basis.

Item 5 Fees and Compensation

With respect to financial planning, when a conflict exists between the interests of the investment adviser and the interests of the client, the client is under no obligation to act upon the investment adviser's recommendation. If the client elects to act on any of the recommendations, the client is under no obligation to affect the transaction through the investment adviser.

Conflicts may include, but are not limited to, when an advisor is also registered as a futures broker and recommends a transaction on behalf of an advisory client. When a futures transaction is executed, the IAR is no longer operating in a fiduciary capacity and is collecting commissions versus investment advisory fees. These commissions are then paid to RCM

Wealth Advisors by the affiliated entity. Other conflicts may include but are not limited to when an IAR is recommending an insurance product for an advisory client, the IAR is again no longer operating in a fiduciary capacity, but as an insurance agent for an affiliated insurance company. These commissions are then paid to RCM Wealth Advisors by the affiliated entity. RCM Wealth Advisors mitigates such conflicts by properly disclosing the nature of the relationship with all affiliated companies.

Currently, the firm does not have a registered representative of a broker-dealer.

INVESTMENT PORTFOLIO MANAGEMENT FEES

The annualized fees for investment portfolio management are charged as a percentage of assets under management, according to the following schedule:

<u>Assets Under Management</u>	<u>Annual Fee</u>
\$0 - \$100,000	2.0%
\$100,000 - \$500,000	1.75%
\$500,000 - \$1,000,000	1.5%
\$1,000,000 - \$5,000,000	1.25%
\$5,000,000+	1.0%

Our fees are billed quarterly, in advance, at the beginning of each calendar quarter. The fee will be calculated on the ending daily balance for the preceding period or the ending daily balance for the partial preceding period for new accounts and billed to the client's account.

Fees will be debited directly from the client's account in accordance with the client signed authorization located in the Investment Advisory Agreement.

Transaction fees are paid by the client, as agreed in the initial Investment Advisory Contract. Clients may request a Fee Schedule at any time by contacting Tim Webb at twebb@rcmfs.com or 866-903-1822. The fees of RCM Wealth Advisors will vary based on the specific custodial relationship affecting the client's account.

A minimum of \$25,000 of assets under management is required for this service. This account size may be negotiable under certain circumstances. RCM Wealth Advisors may group client accounts for the purposes of achieving the minimum account size and determining the annualized fee.

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

Limited Negotiability of Advisory Fees: Although RCM Wealth Advisors has established the aforementioned fee schedule(s), we retain the discretion to negotiate alternative fees on a client by client-by-client basis. Client facts, circumstances and needs are considered in determining the fee schedule. These include the complexity of the client, assets to be placed under management, anticipated future additional assets; related accounts; portfolio style, account composition,

reports, among other factors. The specific annual fee schedule is identified in the contract between the adviser and each client.

Discounts, not generally available to our advisory clients, may be offered to family members and friends of associated persons of our firm.

NON-DISCRETIONARY FEES

A minimum of \$25,000 of assets under management is required for this service. The fees charged will be either a \$500 annual minimum fee or .5% (50 basis points) on the assets held in the account. The maximum fee charged will not exceed 3% of overall portfolio.

The transaction fees are:

Charles Schwab:

Options Purchases and Sales: \$.35 per option

Stocks/ETFs: \$0

Mutual Funds: \$14.95

Any applicable exercise or assignment fees.

Interactive Brokers:

Options Purchases and Sales: \$.25 per option plus exchange fees

Stocks/ETFs: \$.01 per share/\$1 minimum ticket charge plus exchange fees

Any applicable exercise or assignment fees

Managed Asset Portfolios (MAP) Fees

In addition to our regular discretionary and non-discretionary account programs, we also offer our customers the opportunity to participate in our internal investment strategies, each of which entails specific fees as described below.

Managed Asset Portfolios - The Managed Asset Portfolios (MAP) are designed to assist investors with reasoned, systematic, long-term investments, tailored to the risk tolerance and investment objectives of our clients.

The particular allocation weightings of the portfolio to each asset class are based on clients' unique individual needs, investment objectives, financial and tax status, investment risk tolerance, and other factors. The client has the option of enrolling in the MAP Select program, for which they can pick a combination of the strategies described below or simply enrolling in one of the strategies described below. The additional fee for the MAP Select combination program is .5% (50 basis points). The fee for the individual strategy is stated next to the strategy name. Remember- if you enroll in the MAP Select program, you will simply pay a flat .5% (50 basis points) fee rather than any of the stated fees for the individual strategies. Single Manager strategies, described at the end of this Section, do not

require additional fees.

For clients who participate in any of the programs listed below, accounts may be duplicated for the purposes of maintaining accurate accounting records and the client may receive one or more account numbers. All client account numbers will be listed on the final signature page of the advisory agreement.

_____ **MAP Select- Combination of Strategies - .50% (50 basis points)**

_____ **Strategic Knight All Cap Allocation .40% (40 basis points)**

- Brings together an integrated approach using the spectrum of investing disciplines to inform our investing decision. Our Investment Policy Team focuses on developing original insights in order to bring the benefits of quality, control, and an understanding of our investments to our clients.

_____ **Strategic Knight All Cap Allocation w/ Hedge Overlay .60% (60 basis points)**

- The selection of individual investments for allocation brings together an integrated approach using the spectrum of investing disciplines to inform our investing decision. While our Investment Policy Team focuses on developing original insights, this program also focuses on hedging market downside with the use of options.

_____ **Global Equity Income Portfolio .40% (40 basis points)**

- This portfolio looks to obtain consistent income from both Domestic and International securities from high quality, dividend paying companies. With a global approach, the opportunities for increased dividend distributions, strong fundamentals, & stable earnings allow our managers a broader selection of competitive investments.

_____ **Triple Income Portfolio .50% (50 basis points)**

- The Triple Income Options Program is an income and growth investment strategy that combines investing primarily in dividend paying stocks while harvesting option premiums.

_____ **ETF Advisor (Strategic & Tactical) .25% (25 basis points)**

- The underlying approach is to optimize the risk return relationship appropriate to the needs and goals of our clients. These portfolios will invest in a variety of securities and the actual weightings and chosen asset classes will be rebalanced.

Single Manager Strategies

RCM Knights Single Manager Approaches (SMA) focus on the strategies of individual managers and offer clients a diversity of investment options.

_____ **Concentrated High-Growth .75% (75 basis points)**

The portfolio invests in 5-20 domestic equity positions and takes a top-down approach modeled on the common characteristics of the top performing stocks over the last 100 years.

_____ Select Long Term Capital Appreciation .75% (75 basis points)

This portfolio seeks to profit from the view that special businesses that can grow continually over a generation are frequently undervalued because it is assumed growth cannot continue past a short duration. This strategy carefully selects growth companies that pass through.

_____ DOSS - Discretionary Options Spread Strategy .75% (75 basis points)

This strategy is a discretionary options-based spread strategy that trades US listed index options with a non-directional approach. This strategy seeks relative non-correlated returns to the RUT 2000 Index and other publicly traded Indices. The goal of the program is to achieve consistent positive returns in market conditions with lower and higher measures of volatility. Important note is that clients cannot invest directly in an Index and firms are not able to mimic the results of an index. Indexes do not have the same fees or costs of managed portfolios, ETFs or Funds.

FINANCIAL PLANNING FEES

All advisors at RCM Wealth Advisors offer the same fee structure to clients, regardless of the advisor's individual education, background and experience.

RCM Wealth Advisors' Financial Planning fee of \$150 per hour or \$1,500 per plan, determined based on the nature of the services being provided and the complexity of each client's circumstances. Each client's fee will be based on the hours projected to complete the plan. All fees are agreed upon prior to entering into a contract with any client. A client has the option to choose from the Financial Planning Services listed in Item 4 on an ala carte basis, or to engage the Firm in conducting a comprehensive financial plan that incorporates each of those services, as appropriate for the individual client. Every client has the option of engaging RCM Wealth Advisors for financial planning services on either an hourly or fixed fee basis. However, if the client requires a comprehensive financial plan that will require more than 30 hours of work, due to the complexity of the client's financial situation, then the fixed fee for such services may be more than \$1,500 but will never be more than \$3,000. Any fixed fees charged above \$1,500 will be clearly outlined and agreed upon with the client prior to entering into a contract with any client. The fee schedule below provides further information on the fees charged for financial planning services.

RCM Wealth Advisors determines its financial planning fees based on the complexity of each individual client's circumstances and financial situation. When determining our fixed rates, RCM Wealth Advisors takes into consideration the scope of services to be provided to the client, the amount of time that is required to perform those services, and the extent of the relationship and commitment required of the advisor based on the scope of services performed. When determining our hourly rates, our Firm considers the value of the services rendered by the advisors, the market rates for this type of services, and the background, education, and experience of our advisors. We have determined that our Firm is willing to reduce the hourly rate by approximately half if a client desires a fully comprehensive financial plan and desires to pay a flat fee for a bundle of services. Thus, our rate of \$1,500 for approximately 20 hours of work reflects a 50% discount on our regular hourly rate for a la carte services.

We may request a retainer upon completion of our initial fact-finding session with the client; however, advance payment will never exceed \$1,200 for work that will not be completed within six months. The balance is due upon completion of the plan. If no retainer is requested, and no other fee arrangement has been entered into with the client, then fees are due upon completion of the services agreed upon. The engagement for Financial Planning Services and Consultation Services terminates upon the delivery of services or at the conclusion of the project, as outlined in the engagement. Services will not include any portfolio management, monitoring, reviews, follow-ups, or other services.

Fee Schedule

- **Fixed Fees:** The fixed fee of \$1,500 per plan is for an all-inclusive financial plan. This fee includes an initial information gathering session, the preparation of a comprehensive financial plan, subsequent plan presentation meeting and discussion with the client, and one follow-up meeting. The client and advisor will work together in the information gathering session to determine which of the services listed in 1-9 in Item 4 are necessary and applicable based on the individual client's needs. However, the \$1,500 flat fee will allow the client to have any of these services performed by the advisor, subject to the fee agreement agreed upon by the advisor and client. If the client requires a comprehensive financial plan that will require more than 30 hours of work, due to the complexity of the client's financial situation, then the fixed fee for such services may be more than \$1,500 but will never be more than \$3,000.
- **Hourly Fees:** The Firm assesses an hourly rate of \$150 per hour for financial planning services. If a client desires to engage the Firm in completing any one of the financial planning services listed in Item 4, then the client may do so by paying the hourly rate of \$150 per hour. Such fees are generally due on completion of the services; however, other fee-paying arrangements may be established depending on the amount of time required to complete the requested services. All such terms will be clearly set forth in the executed agreement for services.
- **Retainer Services:** Periodic financial planning services are offered to clients as part of an annual retainer program. Such services include periodic reviews, revisions/updates to the financial plan, and day-to-day consulting as required. Fees are \$750 which is equal to one-half of the initial cost of the written financial plan and are payable quarterly in advance. This service is only available to clients that have otherwise engaged RCM Wealth Advisors for financial planning services, and within 90 days of completion of the initial financial plan.

Financial Planning Fee Offset: RCM Wealth Advisors reserves the discretion to reduce or waive the hourly fee and/or the fixed fee if a financial planning client chooses to engage us for our Portfolio Management Services.

GENERAL INFORMATION

Termination of the Advisory Relationship: Clients have the right to terminate a contract within five business days of entering into the contract without penalty. A client agreement may be canceled at any time, by either party, for any reason upon receipt of written notice. As disclosed above, certain fees are paid in advance of services provided. Upon termination of any account, any prepaid, unearned fees will be promptly refunded. In calculating a client's reimbursement of fees, we will pro rate the reimbursement according to the number of days remaining in the billing period.

Mutual Fund Fees: All fees paid to RCM Wealth Advisors for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and/or ETFs to their shareholders. These fees and expenses are described in each fund's prospectus.

These fees will generally include a management fee, other fund expenses, and a possible distribution fee. If the fund also imposes sales charges, a client may pay an initial or deferred sales charge. A client could invest in a mutual fund directly, without our services. In that case, the client would not receive the services provided by our firm which are designed, among other things, to assist the client in determining which mutual fund or funds are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the funds and our fees to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

Additional Fees and Expenses: In addition to our advisory fees, clients are also responsible for the fees and expenses charged by custodians and imposed by broker dealers, including, but not limited to, any transaction charges imposed by a broker dealer with which an independent investment manager effects transactions for the client's account(s). Please refer to the "Brokerage Practices" section (Item 12) of this Form ADV for additional information.

Grandfathering of Minimum Account Requirements: Pre-existing advisory clients are subject to RCM Wealth Advisors' minimum account requirements and advisory fees in effect at the time the client entered into the advisory relationship. Therefore, our firm's minimum account requirements will differ among clients.

Advisory Fees in General: Clients should note that similar advisory services may (or may not) be available from other registered (or unregistered) investment advisers for similar or lower fees.

Limited Prepayment of Fees: Under no circumstances do we require or solicit payment of fees in excess of \$1,200 more than six months in advance of services rendered.

No Other Fees Charged: Other than the fees detailed in this document, including the fees detailed in the "Additional Fees and Expenses" and Item 5 "Fees and Compensation" above, no other fees will be charged to the client without a modification of this document and a written notification to the Client prior to the issuance of any non-disclosed fees.

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

RCM Wealth Advisors does not charge performance-based fees.

Item 7 Types of Clients

RCM Wealth Advisors provides advisory services to the following types of clients:

- Individuals (other than high net worth individuals)
- High net worth individuals
- Pension and profit-sharing plans (other than plan participants)
- Corporations or other businesses not listed above

As previously disclosed in Item 5, our firm has established certain initial minimum account requirements, based on the nature of the service(s) being provided. For a more detailed understanding of those requirements, please review the disclosures provided in each applicable service.

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

METHODS OF ANALYSIS

We use the following methods of analysis in formulating our investment advice and/or managing client assets:

Fundamental Analysis. We attempt to measure the intrinsic value of a security by looking at economic and financial factors (including the overall economy, industry conditions, and the financial condition and management of the company itself) to determine if the company is underpriced (indicating it may be a good time to buy) or overpriced (indicating it may be time to sell).

Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock.

Cyclical Analysis. In this type of technical analysis, we measure the movements of a particular stock against the overall market in an attempt to predict the price movement of the security.

Risks for all forms of analysis. Our securities analysis methods rely on the assumption that the companies whose securities we purchase and sell, the rating agencies that review these securities, and other publicly available sources of information about these securities, are providing accurate and unbiased data. While we are alert to indications that data may

be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

INVESTMENT STRATEGIES

We use the following strategies in managing client accounts:

Strategic Knight All Cap Allocation

- The Strategic Knight is a diversified equity portfolio intended for investors who want to bear similar risk as the S&P 500 index. The portfolio is designed to have comparable sector weightings as the S&P 500 while reflecting active selection of stocks within each sector. Investing in stocks involves risk of loss that clients should be prepared to bear. This strategy invests in US listed stocks, and stock values fluctuate in response to the activities of individual companies, general market and economic conditions. Each holding may be subject to active management, allocation, concentration, sector, and market risk. This strategy may hold growth stocks, which can perform differently from the market as a whole and can be more volatile. In addition, growth securities, at times, may not perform as well as value securities or the stock market in general, and may be out of favor with investors for varying periods of time. The strategy may hold value stocks and thus it may take longer than expected for the value of these investments to rise to the portfolio manager's perceived value. In addition, value securities, at times, may not perform as well as growth securities or the stock market in general, and may be out of favor with investors for varying periods of time. Depending on when securities are sold, there may be a gain or loss in the value of the holdings.

Strategic Knight All Cap Allocation w/ Hedge Overlay

- The Strategic Knight is a diversified equity portfolio for investors who are less willing to bear comparable risk to the S&P 500 index through comparable sector weightings. In an attempt to lessen market risks, the portfolio incorporates a hedging component through options that is intended to limit the extent of a market decline in exchange for a limit to market gains.

Investing in stocks involves risk of loss that clients should be prepared to bear. This strategy invests in US listed stocks, and stock values fluctuate in response to the activities of individual companies, general market and economic conditions. Each holding may be subject to active management, allocation, concentration, sector, and market risk. This strategy may hold growth stocks, which can perform differently from the market as a whole and can be more volatile. In addition, growth securities, at times, may not perform as well as value securities or the stock market in general, and may be out of favor with investors for varying periods of time. The strategy may hold value stocks and thus it may take longer than expected for the value of these investments to rise to the portfolio manager's perceived value. In addition, value securities, at times, may not perform as well as growth securities or the stock market in general, and may be out of favor with investors for varying periods of time. Depending on when securities are sold, there may be a gain or loss in the value of the holdings.

In addition, the hedge portfolio is subject to derivative risk. Derivatives may expose the portfolio to additional risks, including correlation risk, leverage risk, hedging risk and liquidity risk.

Global Equity Income Portfolio

- This strategy invests in US listed and Foreign ADR stocks and attempts to derive gains for the portfolio from two sources—dividends and capital appreciation. Foreign markets can be more volatile than the U.S. market due to increased risks of adverse issuer, political, regulatory, market, or economic developments and can perform differently from the U.S. market. Foreign investments involve greater risks than those of U.S. investments. All stock values fluctuate in response to the activities of individual companies, general market and economic conditions. Investing in stocks involves risk of loss that clients should be prepared to bear. Each holding may be subject to active management, allocation, concentration, sector, and market risk. This strategy may hold growth stocks, which can perform differently from the market as a whole and can be more volatile. In addition, growth securities, at times, may not perform as well as value securities or the stock market in general, and may be out of favor with investors for varying periods of time. The strategy may hold value stocks and thus it may take longer than expected for the value of these investments to rise to the portfolio manager's perceived value. In addition, value securities, at times, may not perform as well as growth securities or the stock market in general, and may be out of favor with investors for varying periods of time. Depending on when securities are sold, there may be a gain or loss in the value of the holdings.

Triple Income Options Program

-The Triple Income Options Program is an income and growth investment strategy that combines investing primarily in dividend paying stocks while harvesting option premiums. Investing in stocks involves risk of loss that clients should be prepared to bear. This strategy invests in US listed stocks, and stock values fluctuate in response to the activities of individual companies, general market and economic conditions. Each holding may be subject to active management, allocation, concentration, sector, and market risk. This strategy may hold growth stocks, which can perform differently from the market as a whole and can be more volatile. In addition, growth securities, at times, may not perform as well as value securities or the stock market in general, and may be out of favor with investors for varying periods of time. The strategy may hold value stocks and thus it may take longer than expected for the value of these investments to rise to the portfolio manager's perceived value. In addition, value securities, at times, may not perform as well as growth securities or the stock market in general, and may be out of favor with investors for varying periods of time. Depending on when securities are sold, there may be a gain or loss in the value of the holdings.

In addition, cash secured puts and covered calls are written on the stocks held in the portfolio. Options on securities may be subject to greater fluctuations in value than an investment in the underlying securities. Writing put and call options are highly specialized activities and entail greater than ordinary

Investment risks and are not suitable for everyone. Such trading can be speculative in nature and carry substantial risk of loss, including the loss of principal.

ETF Advisor (Strategic & Tactical)

- This program intends to provide the investor with exposure to ETF strategies of (1) various investor styles—growth and value, and (2) various sizes—small, medium, and large capitalization stocks. ETFs are subject to among other risks, tracking risk, passive and active management risk, and investor bear both a portfolio's expense and similar expenses incurred

through the ownership of the ETF. Depending on the strategy and type of ETF invested the investor may encounter active management, convertible security, derivative, foreign security, frequent trading, sector, growth stock, value stock, emerging market and geographic risk.

Single Manager Strategies (SMA)

RCM Knights Single Manager Approaches (SMA) focus on the strategies of individual managers and offer clients a diversity of investment options.

Concentrated High-Growth

Investing in stocks involves risk of loss that clients should be prepared to bear. This strategy invests in US listed stocks, and stock values fluctuate in response to the activities of individual companies, general market and economic conditions. The strategy may suffer from concentration risk. Each holding may be subject to active management, allocation, concentration, sector, and market risk. This strategy holds growth stocks, which can perform differently from the market as a whole and can be more volatile. In addition, growth securities, at times, may not perform as well as value securities or the stock market in general, and may be out of favor with investors for varying periods of time. The strategy may hold value stocks and thus it may take longer than expected for the value of these investments to rise to the portfolio manager's perceived value. In addition, value securities, at times, may not perform as well as growth securities or the stock market in general, and may be out of favor with investors for varying periods of time. Depending when you sell you may experience a gain or loss in the value of the stocks.

Select Long Term Capital Appreciation

This portfolio seeks to profit from the view that certain businesses can grow continually over a long period of time. This strategy carefully selects growth companies that pass a valuation criterion.

This strategy invests in US listed stocks, and stock values fluctuate in response to the activities of individual companies, general market and economic conditions. The strategy may suffer from concentration risk. This strategy holds growth stocks, which can perform differently from the market as a whole and can be more volatile. In addition, growth securities, at times, may not perform as well as value securities or the stock market in general, and may be out of favor with investors for varying periods of time.

DOSS - Discretionary Options Spread Strategy

This strategy is a discretionary options-based spread strategy that trades US listed index options with a non-directional approach. This strategy seeks relative non-correlated returns to the RUT 2000 Index and other publicly traded Indices. The goal of the program is to achieve consistent positive returns in market conditions with lower and higher measures of volatility. These strategies are appropriate if they fit the client's needs, investment objectives, risk tolerance, and time horizons, among other considerations:

Risk of Loss. Securities investments are not guaranteed and you may lose money on your investments. We ask that you work with us to help us understand your tolerance for risk. Clients should understand that investing in any securities, including mutual funds, involves a risk of loss of both income and principal, that clients should be prepared to bear.

Item 9 Disciplinary Information

We are required to disclose any legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management.

RCM Wealth Advisors has not been involved in any disciplinary events. RCM Wealth Advisors has been involved in one civil action which was resolved at mediation. RCM Wealth Advisors has not been involved in any administrative proceedings before the SEC or any other federal, state, or foreign regulatory authority.

RCM Wealth Advisors has not been involved in any self-regulatory organization proceedings.

The Adviser's record does not reflect the existence of any data that would be material to a client's or prospective client's evaluation of RCM Wealth Advisors or the integrity of its management.

Item 10 Other Financial Industry Activities and Affiliations

RCM Wealth Advisors, from time to time, engages in limited outside relationships or arrangements that are material to our advisory business and to our clients, as disclosed in Item 14.

RCM Wealth Advisors and RCM Futures & Alternatives are two separate entities related through common ownership of member Robert Schwartz. RCM Futures & Alternatives are an Independent Introducing Broker with a primary focus on providing services for commodity trading. A client of RCM Wealth Advisors is not obligated to select any of the services RCM Futures & Alternatives provide.

We endeavor at all times to put the interest of our clients first as part of our fiduciary duty as a registered investment adviser and take the following steps to address this conflict:

- We disclose to clients the existence of all material conflicts of interest;
- RCM Wealth Advisors discloses to clients that they are not obligated to purchase recommended investment products or services from its management persons or employees in their capacities as registered representatives;
- We collect, maintain and document accurate, complete and relevant client background information, including the client's financial goals and objectives;
- Our management conducts regular reviews of each client account to verify that all recommendations made to a client are suitable to the client's needs and circumstances;

Any outside relationships or arrangements that are material to our Firm's investment advisory services are detailed below:

- 1. Broker-dealer, municipal securities dealer, or government securities dealer:** There is no material outside relationship.
- 2. Investment Company or Other Pooled Investment Vehicle:** There is no material outside relationship.
- 3. Other Investment Adviser or Financial Planner:** There is no material outside relationship.
- 4. Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor:** Robert Schwartz, a member of RCM Wealth Advisors, also maintains a minority interest in an independent introducing broker, RCM Asset Management, LLC. Mr. Schwartz also maintains a minority ownership interest in Attain Portfolio Advisors, LLC, a commodity pool operator. Conflicts may include, but are not limited to, that both RCM Asset Management, LLC and RCM Wealth Advisors could be collecting commissions and/or fees from a transaction that is recommended by an IAR of RCM Wealth Advisors. When a futures transaction is executed, the IAR is no longer operating in a fiduciary capacity and is collecting commissions versus investment advisory fees. Any potential conflicts are handled through disclosure, documentation, and account review.
- 5. Banking or Thrift Institution:** There is no material outside relationship.

- 6. Accountant or Accounting Firm:** There is no material outside relationship.
- 7. Lawyer or Law Firm:** There is no material outside relationship.
- 8. Insurance Company or Agency:** Timothy Webb, Michael Tosaw, Frank Schulz, Brendan Walsh, Jonah Weiss, Edward Cheatham and James Bellinger hold an insurance license. Conflicts of interest may include but are not limited to when an IAR is recommending an insurance product for an advisory client, the IAR is no longer operating in a fiduciary capacity, but as an insurance agent for an affiliated insurance company. These commissions are then paid to RCM Wealth Advisors by the affiliated entity. RCM Wealth Advisors mitigates such conflicts by properly disclosing the nature of the relationship with all affiliated companies.
- 9. Pension Consultant:** There is no material outside relationship.
- 10. Real Estate Broker or Dealer:** There is no material outside relationship.
- 11. Sponsor or Syndicator of Limited Partnerships:** There is no material outside relationship.
- 12. Qualified Plans:** Some plans are held through insurance companies and paid out as commission versus advisory fees.

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

Code of Ethics Statement of Availability

RCM Wealth Advisors has a Code of Ethics and Policies and Procedures manual that is given to each employee, registered representative, or associated person of RCM Wealth Advisors LLC upon hiring. A copy of this Code of Ethics is available to clients or prospective clients, at no charge, upon the issuance of a written request.

RCM Wealth Advisors
c/o Timothy Webb
318 W Adams St.
10th Floor
Chicago, IL 60606
twebb@rcmfs.com

RCM Wealth Advisors and individuals associated with our firm are prohibited from engaging in principal transactions.

RCM Wealth Advisors and individuals associated with our firm are prohibited from engaging in agency cross transactions.

Our Code of Ethics is designed to assure that the personal securities transactions, activities and interests of our employees will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts.

Our firm and/or individuals associated with our firm may buy or sell for their personal accounts securities identical to or different from those recommended to our clients. In addition, any related person(s) may have an interest or position in a certain security(ies) which may also be recommended to a client.

It is the expressed policy of our firm that no person employed by us may purchase or sell any security prior to a transaction(s) being implemented for an advisory account, thereby preventing such employee(s) from benefiting from transactions placed on behalf of advisory accounts.

We may aggregate our employee trades with client transactions where possible and when compliant with our duty to seek best execution for our clients. In these instances, participating clients will receive an average share price and transaction costs will be shared equally and on a pro-rata basis. In the instances where there is a partial fill of a particular batched order, we will allocate all purchases pro-rata, with each account paying the average price. Our employee accounts will be included in the pro-rata allocation.

As these situations represent actual or potential conflicts of interest to our clients, we have established the following policies and procedures for implementing our firm's Code of Ethics, to ensure our firm complies with its regulatory obligations and provides our clients and potential clients with full and fair disclosure of such conflicts of interest:

1. No principal or employee of our firm may put his or her own interest above the interest of an advisory client.
2. No principal or employee of our firm may buy or sell securities for their personal portfolio(s) where their decision is a result of information received as a result of his or her employment unless the information is also available to the investing public.
3. It is the expressed policy of our firm that no person employed by us may purchase or sell any security prior to a transaction(s) being implemented for an advisory account. This prevents such employees from benefiting from transactions placed on behalf of advisory accounts.
4. Our firm requires prior approval for any IPO or private placement investments by related persons of the firm.
5. We maintain a list of all reportable securities holdings for our firm and anyone associated with this advisory practice that has access to advisory recommendations ("access person"). These holdings are reviewed on a regular basis by our firm's Chief Compliance Officer or his/her designee.
6. We have established procedures for the maintenance of all required books and records.
7. All clients are fully informed that related persons may receive separate commission

- compensation when effecting transactions during the implementation process.
8. Clients can decline to implement any advice rendered, except in situations where our firm is granted discretionary authority.
 9. All of our principals and employees must act in accordance with all applicable Federal and
 10. State regulations governing registered investment advisory practices.
 11. Any individual who violates any of the above restrictions may be subject to termination.

RCM Wealth Advisors has a Code of Ethics and a Policies and Procedures manual that is given to each employee, registered representative, or associated person of RCM Wealth Advisors LLC upon hiring.

Item 12 Brokerage Practices

RCM Wealth Advisors does not have any soft-dollar arrangements and does not receive any soft-dollar benefits.

RCM Wealth Advisors permits that clients provide us with written authority to determine the custodian to use and the commission costs that will be charged to our clients for these transactions.

These clients must include any limitations on this discretionary authority in this written authority statement. Clients may change/amend these limitations as required. Such amendments must be provided to us in writing.

When determining which custodian to utilize, we take into consideration several factors. These factors include, but may not be limited to the custodian's reputation, ease of execution, services offered, financial strength, pricing, responsiveness and pricing. These factors help us determine which firm will fulfill both your needs for best execution and our need to provide you with the best services available.

RCM Wealth Advisors will block trades where possible and when advantageous to clients.

This blocking of trades permits the trading of aggregate blocks of securities composed of assets from multiple client accounts, so long as transaction costs are shared equally and on a pro-rated basis between all accounts included in any such block.

Block trading may allow us to execute equity trades in a timelier, more equitable manner, at an average share price. RCM Wealth Advisors will typically aggregate trades among clients whose accounts can be traded at a given custodian. RCM Wealth Advisors' block trading policy and procedures are as follows:

- 1) Transactions for any client account may not be aggregated for execution if the practice is prohibited by or inconsistent with the client's advisory agreement with RCM Wealth Advisors or our firm's order allocation policy.

- 2) The trading desk in concert with the portfolio manager must determine that the purchase or sale of the particular security involved is appropriate for the client and consistent with the client's investment objectives and with any investment guidelines or restrictions applicable to the client's account.
- 3) The portfolio manager must reasonably believe that the order aggregation will benefit and will enable RCM Wealth Advisors to seek best execution for each client participating in the aggregated order. This requires a good faith judgment at the time the order is placed for the execution. It does not mean that the determination made in advance of the transaction must always prove to have been correct in the light of a "20-20 hindsight" perspective. Best execution includes the duty to seek the best quality of execution, as well as the best net price.
- 4) Prior to entry of an aggregated order, an order ticket must be completed which identifies each client account participating in the order and the proposed allocation of the order, upon completion, to those clients.
- 5) If the order cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated pro rata among the participating client accounts in accordance with the initial order ticket or other written statement of allocation. However, adjustments to this pro rata allocation may be made to participating client accounts in accordance with the initial order ticket or other written statement of allocation. Furthermore, adjustments to this pro rata allocation may be made to avoid having odd amounts of shares held in any client account, or to avoid excessive ticket charges in smaller accounts.
- 6) Generally, each client that participates in the aggregated order must do so at the average price for all separate transactions made to fill the order and must share in the commissions on a pro rata basis in proportion to the client's participation. Under the client's agreement with the custodian, transaction costs may be based on the number of shares traded for each client.
- 7) If the order will be allocated in a manner other than that stated in the initial statement of allocation, a written explanation of the change must be provided to and approved by the Chief Compliance Officer no later than the morning following the execution of the aggregate trade.
- 8) RCM Wealth Advisors' client account records separately reflect, for each account in which the aggregated transaction occurred, the securities which are held by, and bought and sold for, that account.
- 9) Funds and securities for aggregated orders are clearly identified on RCM Wealth Advisors' records and to the custodians or other intermediaries handling the transactions, by the appropriate account numbers for each participating client.
- 10) No client or account will be favored over another.

Financial Planning and Consultation clients are welcome to utilize any service provider they may choose and are welcome to implement any advice or recommendations in whole or in part on a non-discretionary basis.

Your advisor will typically recommend that you use one particular custodian for your investments with us. The choice of the custodian is based on factors such as the value of your investments and your investment needs. As our client, you may direct us in writing to use a particular custodian to execute some or all transactions in your account(s). If we do not have an agreement with that firm, you will need to negotiate the terms and arrangements for the account. We will not seek better execution services or prices. We will also not be able to aggregate transactions to achieve better pricing. You may also pay transaction costs and/or receive less favorable net prices.

Subject to our duty of best execution, we may decline your request to direct brokerage. We may do this if we believe the arrangement would result in additional operational difficulties or violate restrictions imposed by other firms we (or our Advisors) have agreements with. We are aware of our duty to obtain best execution for you and have implemented policies and procedures reasonably designed to do so.

RCM Wealth Advisors utilizes Interactive Brokers and Charles Schwab as custodians, and we reserve the right to open new custodial relationships in the future based on the needs of our clients.

Commission rates are one of several factors that RCM Wealth Advisors uses in determining which custodians to form relationships with. Any custodial relationship maintained by RCM Wealth Advisors is governed by the RCM Wealth Advisors Policies and Procedures Manual and the Code of Ethics, as well as the best practices of the industry.

Item 13 Review of Accounts

INVESTMENT PORTFOLIO MANAGEMENT

REVIEWS: While the underlying securities within Individual Portfolio Management Services accounts are continually monitored, these accounts are reviewed at least quarterly. Accounts are reviewed in the context of each client's stated investment objectives and guidelines. More frequent reviews may be triggered by material changes in variables such as the client's individual circumstances, or the market, political or economic environment.

These accounts are reviewed by: Timothy Webb, CIO, CCO

REPORTS: Clients will receive monthly statements and confirmations of transactions from their custodian summarizing account performance, balances and holdings. Currently, clients do not receive reports from the firm.

FINANCIAL PLANNING SERVICES

REVIEWS: While reviews may occur at different stages depending on the nature and

terms of the specific engagement, typically no formal reviews will be conducted for Financial Planning clients unless otherwise contracted for.

REPORTS: Financial Planning clients will receive a completed financial plan. Additional reports will not typically be provided unless otherwise contracted for.

Item 14 Client Referrals and Other Compensation

It is a part of RCM Wealth Advisors policy to engage solicitors or to pay related or non-related persons for referring potential clients to our firm. Solicitors who believe a prospect is appropriate for RCM Wealth Advisors will recommend that prospects entertain proposals for RCM investment advisory services. Prior to a referred prospect becoming a client of RCM, Solicitor will provide each prospect who agree to entertain a proposal for services with a Disclosure Statement required by Rule 206 (4)-3 and RCM's Form ADV Part 2A. A predetermined and uniform fee will be paid to the solicitor after it has been disclosed and signed by the referred client.

Item 15 Custody

Our firm does have custody of clients' cash or bank accounts, and securities for the reasons listed below:

We previously disclosed in the "Fees and Compensation" section (Item 5) of this Brochure that our firm directly debits advisory fees from client accounts. Clients provide our firm written authority to deduct our fees from their accounts in the Investment Advisory Agreement. Our firm will send a copy of the invoice to the client and the custodian, at the time of billing. As part of this billing process, the client's custodian is advised of the amount of the fee to be deducted from that client's account.

On at least a quarterly basis, the custodian is required to send to the client a statement showing all transactions within the account during the reporting period. It is important for clients to carefully review their custodial statements.

Clients should contact us directly if they believe that there may be an error in their statement.

Item 16 Investment Discretion

Clients may hire us to provide discretionary asset management services, in which case we place trades in a client's account without contacting the client prior to each trade to obtain the client's permission.

Our discretionary authority includes the ability to do the following without contacting the client:

- determine the security to buy or sell; and/or
- determine the amount of the security to buy or sell

Clients give us discretionary authority when they sign a discretionary agreement with our firm and may limit this authority by giving us written instructions. Clients may also change/amend such limitations by once again providing us with written instructions.

Item 17 Voting Client Securities

As a matter of firm policy, we do not vote proxies on behalf of clients. Therefore, although our firm may provide investment advisory services relative to client investment assets, clients maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets. Clients are responsible for instructing each custodian of the assets, to forward to the client copies of all proxies and shareholder communications relating to the client's investment assets.

The proxy statements are received by clients from custodians. We do not offer any consulting assistance regarding proxy issues to clients, nor do we advise on particular solicitations.

Item 18 Financial Information

As an advisory firm that maintains discretionary authority for client accounts, we are also required to disclose any financial condition that is reasonable likely to impair our ability to meet our contractual obligations. RCM Wealth Advisors has no such financial circumstances to report.

Under no circumstances do we require or solicit payment of fees in excess of \$1,200 per client more than six months in advance of services rendered. Therefore, we are not required to include a financial statement.

RCM Wealth Advisors has not been the subject of a bankruptcy petition at any time during the past ten years.