



## **Redstone Wealth Management, LLC**

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**March 6, 2024**

### **FORM ADV PART 2A BROCHURE – ERISA 3(21) PLANS**

Redstone Wealth Management, LLC (IARD/CRD# 311525) is a registered investment adviser. An "investment adviser" means any person who, for compensation, engages in the business of advising others, either directly or through publications or writings, as to the value of securities or as to the advisability of investing in, purchasing, or selling securities, or who, for compensation and as part of a regular business, issues or promulgates analyses or reports concerning securities. Registration with the SEC or any state securities authority does not imply a certain level of skill or training.

This brochure provides information about the qualifications and business practices of Redstone Wealth Management, LLC. If you have any questions about the contents of this brochure, please contact us at **(405) 844-9933 or [Support@RedstoneWM.com](mailto:Support@RedstoneWM.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 Redstone Wealth Management, LLC is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Item 2 - Material Changes**

We review and update our brochure, as needed and at least annually, to make sure that it remains current. The purpose of this page is to inform you of any material changes since the previous annual updating amendment filed with regulators on March 23, 2023.

On March 6, 2024, we submitted our annual updating amendment filing for the firm's fiscal year 2023. We had no material changes.

We strongly encourage you to carefully review the full brochure in addition to the above referenced changes. If you have questions, or if you would like to receive a complete copy of our current brochure free of charge at any time, please contact us at **(405) 844-9933** or [\*\*Support@RedstoneWM.com\*\*](mailto:Support@RedstoneWM.com).

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#### **Item 4 - Advisory Business**

##### **Description of Services and Fees**

Redstone Wealth Management, LLC (hereinafter "Redstone Wealth Management") is a registered investment adviser based in Oklahoma. We are a limited liability company, formed under the laws of the State of Oklahoma. We have been providing investment advisory services since 2020. Cantrell Group, Inc. is the principal owner of our firm. Lee Cantrell is President and co-owner Cantrell Group, Inc., and he serves as President and Chief Compliance Officer of Redstone Wealth Management.

You may see the term Associated Person throughout this Brochure. As used in this Brochure, this term refers to anyone from our firm who is an officer, employee, and all individuals providing investment advice on behalf of our firm, including Mr. Cantrell. Such persons are properly registered as investment adviser representatives in applicable jurisdictions where required. Currently, we offer the following investment advisory services, personalized to each individual client.

##### **ERISA Plan Services**

Currently, Redstone Wealth Management offers the following ERISA plan services to employer sponsored and other qualified plans, their sponsors, and other named fiduciaries. Services are offered on an ongoing basis.

##### ***Non-discretionary Fiduciary Services***

These services are designed to allow the plan's sponsor and other named fiduciaries (the "client") to retain full discretionary authority or control over assets of the plan. Recommendations will be made directly to the client; plan participants will not be provided individualized, personal investment advice under these services. We will perform these non-discretionary investment advisory services through our investment adviser representatives, and we will charge a fee for these fiduciary services, as described in this Form ADV and the advisory agreement. We will perform these investment advisory services to the plan as a fiduciary defined under ERISA Section 3(21) and we will act with the degree of diligence, care, and skill that a prudent person rendering similar services would exercise under similar circumstances.

The client may engage us to perform one or more of the following non-discretionary investment advisory services:

- Review and provide recommendations to the investment policy statement (IPS).
- Assist client with recommendations regarding menu diversification, and non-discretionary model portfolios.
- Meet with client on a periodic basis to discuss the reports and the investment decisions.
- Assist in monitoring investment options by preparing quarterly and annual reports that document investment performance, consistency of fund management, and conformance to any guidelines set forth in the plan and will notify you with any recommendations.
- Perform analysis of the fees and expenses associated with the investments, and the service providers, and recommend changes when warranted.
- Provide recommendations and guidance regarding a Qualified Default Investment Alternative.

##### ***Non-Fiduciary Services***

We offer the following Non-Fiduciary Services:

- On a mutually agreeable schedule, we will assist in the education of the participants in the plan, about

general investment principals and the investment alternatives available under the plan. You understand that our assistance with general investment education shall be consistent with and within the scope of the definition of investment education provided by the Department of Labor.

- Upon a mutually agreeable date(s), we will assist in the group enrollment meetings and discuss retirement plan participation among employees and investment and financial understanding by the employees.

#### ***IRA Rollover Advice for Plan Participants***

We offer roll over advice to plan participants who desire to roll over plan assets into an individual retirement account "(IRA)" for a one-time fixed fee of \$25. We offer rollover advice as defined by the Department of Labor, which may also include setting up and/or completing the rollover transaction. We do not serve as a custodian, and we do not provide legal or tax advice. Plan participants may engage us separately for asset management or financial planning services.

If you choose to roll over plan assets into an IAR, you may incur other levels of fees and expenses, including, but not limited to, investment-related expenses imposed by other service providers and mutual fund managers, as well as other fees and expenses charged by the custodian, third-party administrator, and/or recordkeeper. We make no representations or warranties relating to any costs or expenses associated with the services provided by any third parties; these fees are in addition to the fee paid to us for the rollover advice and/or if you engage us for additional asset management or financial planning services.

If you elect to roll the assets to an IRA that is subject to our management under a separate management agreement, we will charge you an asset-based fee as set forth in the agreement you execute with our firm. This practice presents a conflict of interest because persons providing investment advice on our behalf have an incentive to recommend a rollover to you for the purpose of generating fee-based compensation rather than solely based on your needs. You are under no obligation, contractually or otherwise, to complete the rollover. Moreover, if you do complete the rollover, you are under no obligation to have the assets in an IRA managed by our firm. We will provide you with an analysis on any rollover recommendation(s) along with appropriate disclosures.

#### ***Important Considerations***

Many employers permit former employees to keep their retirement assets in their company plan. Also, current employees can sometimes move assets out of their company plan before they retire or change jobs. In determining whether to complete the rollover to an IRA, and to the extent the following options are available, you should consider the costs and benefits.

An employee will typically have four options:

- Leaving the funds in your employer's (former employer's) plan.
- Moving the funds to a new employer's retirement plan.
- Cashing out and taking a taxable distribution from the plan.
- Rolling the funds into an IRA rollover account.

Each of these options has advantages and disadvantages and before making a change we encourage you to speak with your CPA and/or tax attorney. If you are considering rolling over your retirement funds to an IRA for us to manage here are a few points to consider before you do so:

- Determine whether the investment options in your employer's retirement plan address your needs or whether you might want to consider other types of investments.
  - Employer retirement plans generally have a more limited investment menu than IRAs.
  - Employer retirement plans may have unique investment options not available to the public such as employer securities, or previously closed funds.
- Your current plan may have lower fees than our fees.
  - If you are interested in investing only in mutual funds, you should understand the cost structure of the share classes available in your employer's retirement plan and how the costs of those share classes compare with those available in an IRA.
  - You should understand the various products and services you might take advantage of at an IRA provider and the potential costs of those products and services.
- Our strategy may have higher risk than the option(s) provided to you in your plan.
- Your current plan may also offer financial advice.
- If you keep your assets titled in a 401k or retirement account, you could potentially delay your required minimum distribution(s).
- Your 401k may offer more liability protection than a rollover IRA; each state may vary.
  - Generally, federal law protects assets in qualified plans from creditors. Since 2005, IRA assets have been generally protected from creditors in bankruptcies. However, there can be some exceptions to the general rules so you should consult with an attorney if you are concerned about protecting your retirement plan assets from creditors.
- You may be able to take out a loan on your 401k, but not from an IRA.
- IRA assets can be accessed any time; however, distributions are subject to ordinary income tax and may also be subject to an early distribution penalty unless they qualify for an exception such as disability, higher education expenses, or the purchase of a home.
- If you own company stock in your plan, you may be able to liquidate those shares at a lower capital gains tax rate.
- Your plan may allow you to hire us as the manager and keep the assets titled in the plan name.

It is important that you understand the differences between these types of accounts and to decide whether a rollover is best for you. Prior to proceeding, if you have questions contact your investment adviser representative, or call our main number as listed on the cover page of this brochure.

#### **Wrap Fee Programs**

A wrap fee program combines asset management, advisory services, and trade execution for a single fee. Redstone Wealth Management does not manage or sponsor any wrap fee programs.

#### **Assets Under Management**

The services described herein do not include asset management; therefore, we have no assets under management related to the consulting services offered to plan clients.

## **Item 5 - Fees and Compensation**

### **ERISA Plan Fees**

Fees for the ERISA plan services are negotiable depending upon the complexity of the plan's goals and objectives, the level of agreed upon services, and the number of plan participants. Maximum annualized fees are based on the value of the plan assets as follows:

| <b><u>Plan Assets</u></b>    | <b><u>Maximum Annualized Fee</u></b> |
|------------------------------|--------------------------------------|
| \$500,000 - \$5,000,000      | 1.00%                                |
| \$5,000,001 - \$10,000,000   | 0.75%                                |
| \$10,000,001 to \$50,000,000 | 0.50%                                |
| \$50,000,001 - \$100,000,000 | 0.25%                                |
| \$100,000,001 and over       | 0.10%                                |

Fees are:

- payable either monthly or quarterly in advance or in arrears,
- based either upon the daily average account balance for the preceding billing period (for fees paid in advance) or for the relevant billing period (for fees paid in arrears), or the market value of the account as of the last day of the preceding period (for fees paid in advance) or as of the last day of the relevant billing period (for fees paid in arrears), and
- will be billed either directly to the client or deducted from plan assets by the plan's recordkeeper or other custodian in accordance with the negotiated terms of the agreement executed between the client and our firm.

No increase in the Fees will be effective without prior written notice. Comparable services may be available from other advisers for higher or lower fees.

The client may incur other levels of fees and expenses, including, but not limited to, investment-related expenses imposed by other service providers and mutual fund managers not affiliated with us, and other fees and expenses charged by the plan's custodian, third-party administrator, and/or recordkeeper. We make no representations or warranties relating to any costs or expenses associated with the services provided by any third parties.

Fees charged by us for the services are in addition to any brokerage, custodial and/or other fees that may be charged to you by other service providers to the plan. All fees paid to Redstone Wealth Management for ERISA plan services are separate and distinct from the fees and expenses charged by mutual funds, variable annuities and exchange traded funds to their shareholders. These fees and expenses are described in each investment's prospectus. These fees will generally include a management fee, other expenses, and possible distribution fees. If the investment also imposes sales charges, a client may pay an initial or deferred sales charge. ERISA plan services provided by Redstone Wealth Management may, among other things, assist the client in determining which investments are most appropriate based on its financial condition and objectives and may provide other administrative assistance as selected by the client. Accordingly, the client should review both the fees charged by the funds, the fund manager, the plan's other service providers, and the fees charged by Redstone Wealth Management to fully understand the total amount of fees to be paid by the client and to evaluate the ERISA plan services being provided.

While not necessarily related specifically to the ERISA plan services, various vendors, product providers, distributors and others may provide non-monetary compensation by paying some expenses related to training

and education, including travel expenses, and attaining professional designations. We might receive payments to subsidize our own training programs. Certain vendors may invite us to participate in conferences, on-line training or provide us publications that may further investment adviser representatives and employees' skills and knowledge. Some may occasionally provide us with gifts, meals, and entertainment of reasonable value consistent with industry rules and regulations.

Either party may terminate the services agreement within five (5) business days of executing the agreement without incurring a penalty or charge. Otherwise, either party may terminate the agreement upon thirty (30) days prior written notice to the other party. If applicable, we will be entitled to a pro-rata amount of compensation; or, if applicable, any unearned fees paid in advance will be refunded promptly.

***Rollover Fees for Plan Participants***

If you engage us for rollover services, the fee will be a one-time \$25 fee payable directly to our firm upon execution of the roll over services agreement with our firm.

**Additional Fees and Expenses**

As part of our investment advisory services to you, we may invest, or recommend that you invest, in mutual funds and exchange traded funds. The fees that you pay to our firm for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds or exchange traded funds (described in each fund's prospectus) to their shareholders. These fees will generally include an advisory fee and other fund expenses. You may also incur transaction charges and/or brokerage fees when purchasing or selling securities. These charges and fees are typically imposed by the broker-dealer or custodian through which your account transactions are executed. We do not share in any portion of the brokerage fees/transaction charges imposed by the broker-dealer or custodian. Where suitable, we will recommend no-load mutual funds. To fully understand the total cost you will incur, you should review all the fees charged by mutual funds, exchange traded funds, our firm, and others. For information on our brokerage practices, please refer to the "Brokerage Practices" section of this Disclosure Brochure.

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

Performance-based fees are fees that are based on a share of capital gains or capital appreciation of a client's account. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees. We do not accept performance-based fees or participate in side-by-side management. Our fees are calculated as described in the *Advisory Business* section above, and are not charged on the basis of a share of capital gains upon, or capital appreciation of, the funds in your advisory account.

**Item 7 - Types of Clients**

We offer investment advisory services to pension and profit sharing and other types of retirement plans. We do not require a minimum account size to establish an advisory relationship.



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

We may use one or more of the following methods of analysis and/or investment strategies when providing investment advice to you:

- *Fundamental Analysis* – involves analyzing individual companies and their industry groups, such as a company's financial statements, details regarding the company's product line, the experience and expertise of the company's management, and the outlook for the company's industry. The resulting data is used to measure the true value of the company's stock compared to the current market value. The primary risk of fundamental analysis is that information obtained may be incorrect and the analysis may not provide an accurate estimate of earnings, which may be the basis for a stock's value. If securities prices adjust rapidly to new information, utilizing fundamental analysis may not result in favorable performance.
- *Technical Analysis* – technical analysis is a technique that relies on the assumption that current market data (such as charts of price, volume, and open interest) can help predict future market trends, at least in the short term. It assumes that market psychology influences trading and can predict when stocks will rise or fall. Technical trading models are mathematically driven based upon historical data and trends of domestic and foreign market trading activity, including various industry and sector trading statistics within such markets. Technical trading models, through mathematical algorithms, attempt to identify when markets are likely to increase or decrease and identify appropriate entry and exit points. The primary risk of technical trading models is that historical trends and past performance cannot predict future trends, and there is no assurance that the mathematical algorithms employed are designed properly, updated with new data, and can accurately predict future market, industry, and sector performance. Please be advised that investing involves risk and that no particular investment strategy can guarantee against losses. In particular, stop loss orders do not guarantee securities will be sold at the stop loss price. Sale orders are generally converted to market orders at the stop loss price and may be executed at a lower price due to liquidity and current demand for the security. In addition, stop loss orders may increase trading costs. Conversely, there is no guarantee that buy orders will be executed at a specified price.
- *Cyclical Analysis* – Cyclical analysis is similar to technical analysis in that it involves the analysis of market conditions at a macro (entire market/economy) or micro (company specific) level, rather than the overall fundamental analysis of the health of the particular company. The primary risks with cyclical analysis are similar to those of technical analysis.
- *Long Term Purchases* – securities purchased with the expectation that the value of those securities will grow over a relatively long period of time, generally greater than one year. Using a long-term purchase strategy generally assumes the financial markets will go up in the long-term which may not be the case. There is also the risk that the segment of the market that you are invested in or perhaps just your particular investment will go down over time even if the overall financial markets advance. Purchasing investments long-term may create an opportunity cost - "locking-up" assets that may be better utilized in the short-term in other investments.

#### **Investing in securities involves risk of loss that you should be prepared to bear.**

The investment advice provided along with the strategies suggested by Redstone Wealth Management will vary depending on each client's specific financial situation and goals. This brief statement does not disclose all of the

risks and other significant aspects of investing in financial markets. In light of the risks, you should fully understand the nature of the contractual relationship(s) into which you are entering and the extent of your exposure to risk. Certain investing strategies may not be suitable for many members of the public. You should carefully consider whether the strategies employed would be appropriate for you in light of your experience, objectives, financial resources and other relevant circumstances.

**General Investment Risk:** All investments come with the risk of losing money. Investing involves substantial risks, including complete possible loss of principal plus other losses and may not be suitable for many members of the public. Investments, unlike savings and checking accounts at a bank, are not insured by the government to protect against market losses. Different market instruments carry different types and degrees of risk and you should familiarize yourself with the risks involved in the particular market instruments in which you intend to invest.

**Loss of Value:** There can be no assurance that a specific investment will achieve its investment objectives and past performance should not be seen as a guide to future returns. The value of investments and the income derived may fall as well as rise and investors may not recoup the original amount invested. Investments may also be affected by any changes in exchange control regulation, tax laws, withholding taxes, international, political and economic developments, and governmental economic or monetary policies.

**Interest Rate Risk:** Fixed income securities and funds that invest in bonds and other fixed income securities may fall in value if interest rates change. Generally, the prices of debt securities rise when interest rates fall, and their prices fall when interest rates rise. Longer-term debt securities are usually more sensitive to interest rate changes.

**Credit Risk:** Investments in bonds and other fixed income securities are subject to the risk that the issuer(s) may not make required interest payments. An issuer suffering an adverse change in its financial condition could lower the credit quality of a security, leading to greater price volatility of the security. A lowering of the credit rating of a security may also offset the security's liquidity, making it more difficult to sell. Funds investing in lower quality debt securities are more susceptible to these problems and their value may be more volatile.

**Foreign Exchange Risk:** Foreign investments may be affected favorably or unfavorably by exchange control regulations or changes in the exchange rates. Changes in currency exchange rates may influence the share value, the dividends or interest earned and the gains and losses realized. Exchange rates between currencies are determined by supply and demand in the currency exchange markets, the international balance of payments, governmental intervention, speculation, and other economic and political conditions. If the currency in which a security is denominated appreciates against the US Dollar, the value of the security will increase. Conversely, a decline in the exchange rate of the currency would adversely affect the value of the security.

**Cybersecurity Risk:** Our firm and our service providers are subject to risks associated with a breach in cybersecurity. Cybersecurity is a generic term used to describe the technology, processes, and practices designed to protect networks, systems, computers, programs, and data from cyber-attacks and hacking by other computer users, and to avoid the resulting damage and disruption of hardware and software systems, loss or corruption of data, and/or misappropriation of confidential information. In general, cyber-attacks are deliberate; however, unintentional events may have similar effects. Cyber-attacks may cause losses to clients by interfering with the processing of transactions, affecting the ability to calculate net asset value or impeding or sabotaging trading. Clients may also incur substantial costs as the result of a cybersecurity breach, including those associated with forensic analysis of the origin and scope of the breach, increased and upgraded cybersecurity, identity theft,

unauthorized use of proprietary information, litigation, and the dissemination of confidential and proprietary information. Any such breach could expose our firm to civil liability as well as regulatory inquiry and/or action. In addition, clients could be exposed to additional losses as a result of unauthorized use of their personal information. While our firm has established a business continuity plan and systems designed to prevent cyber-attacks, there are inherent limitations in such plans and systems, including the possibility that certain risks have not been identified. Similar types of cyber security risks are also present for issuers of securities, investment companies and other investment advisers in which we invest, which could result in material adverse consequences for such entities and may cause a client's investment in such entities to lose value.

#### **Recommendation of Particular Types of Securities**

As disclosed under the "Advisory Business" section in this Brochure, we provide advice on various types of securities and we do not necessarily recommend one particular type of security over another since each client has different needs and different tolerance for risk. Each type of security has its own unique set of risks associated with it and it would not be possible to list here all of the specific risks of every type of investment. Even within the same type of investment, risks can vary widely. However, in very general terms, the higher the anticipated return of an investment, the higher the risk of loss associated with it.

**Risks Associated with Investing in Mutual Funds:** Mutual funds are professionally managed collective investment systems that pool money from many investors and invest in stocks, bonds, short-term money market instruments, other mutual funds, other securities, or any combination thereof. The fund will have a manager that trades the fund's investments in accordance with the fund's investment objective. While mutual funds generally provide diversification, risks can be significantly increased if the fund is concentrated in a particular sector of the market, primarily invests in small cap or speculative companies, uses leverage (i.e., borrows money) to a significant degree, or concentrates in a particular type of security (i.e., equities) rather than balancing the fund with different types of securities. The returns on mutual funds can be reduced by the costs to manage the funds. In addition, while some mutual funds are "no load" and charge no fee to buy into, or sell out of, other types of mutual funds do charge such fees which can also reduce returns.

**Risks Associated with Investing in Exchange Traded Funds (ETF):** Investing in stocks & ETF's carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Investments in these securities are not guaranteed or insured by the FDIC or any other government agency.

#### **Item 9 - Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Redstone Wealth Management's advisory business or of the integrity of its management personnel. We have no material history of legal or disciplinary events to report under this item. Information regarding management persons of our firm and Redstone Wealth Management can be found at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

### **Item 10 - Other Financial Industry Activities or Affiliations**

Redstone Wealth Management is not registered as and does not have a pending application to register as, a securities broker-dealer, Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor. No individuals associated with our firm are currently an associated person of a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor.

#### **Registrations with Broker-Dealer**

Certain persons associated with our firm, who provide investment advice on behalf of our firm, including management persons, are also registered representatives with Peak Brokerage Services, LLC ("Peak"), an unaffiliated, registered securities broker-dealer and Financial Industry Regulatory Authority ("FINRA") member firm. Such persons, in their capacities as registered representatives of Peak, are eligible to receive commission-based compensation for buying and selling securities, including 12b-1 fees (trails), for the sale of mutual funds, securities, and annuities products. This commission-based compensation is separate and distinct from advisory fees paid to our firm and our investment adviser representatives. Clients are under no obligation to purchase products or services through Peak or any person associated with Peak, including individuals associated with our firm. Clients may purchase or sell securities from any brokerage firm they choose. Mr. Cantrell and Mr. Terrell anticipate spending approximately 5% of their professional time on business activities conducted through Peak.

#### **Insurance Activities and Affiliations**

Associated Persons of Redstone Wealth Management, who are licensed as independent insurance agents, will earn commission-based compensation for selling insurance products, including insurance products they sell to advisory clients. Insurance commissions earned by these persons are separate and in addition to our advisory fees. This practice presents a conflict of interest because persons providing investment advice on behalf of our firm who are insurance agents have an incentive to recommend insurance products to clients for the purpose of generating commissions rather than basing those recommendations based solely on their needs. Clients are not required to purchase insurance products through any person associated with Redstone Wealth Management or Peak. Clients have full discretion whether to purchase recommended insurance products and clients may purchase them from any insurance agency and agent they choose. Mr. Cantrell and Mr. Terrell anticipate spending approximately 5% of their professional time providing insurance services.

Mr. Cantrell and Mr. Terrell do not accept commission-based compensation in connection with advisory services offered to ERISA plan clients.

Any material conflicts of interest between you and our firm, or our employees are disclosed in this Disclosure Brochure. If at any time, additional material conflicts of interest develop, we will provide you with written notification of the material conflicts of interest or an updated Disclosure Brochure.

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

#### **Description of Our Code of Ethics**

Redstone Wealth Management has adopted a Code of Ethics (the "Code") to address investment advisory conduct. The Code focuses primarily on fiduciary duty, personal securities transactions, insider trading, gifts, and conflicts of interest. The Code includes Redstone Wealth Management's policies and procedures developed to protect client's interests in relation to the following topics:

- The duty at all times to place the interests of clients first;
- The requirement that all personal securities transactions be conducted in such a manner as to be consistent with the code of ethics.
- The responsibility to avoid any actual or potential conflict of interest or misuse of an employee's position of trust and responsibility;
- The fiduciary principle that information concerning the identity of security holdings and financial circumstances of clients is confidential; and
- The principle that independence in the investment decision-making process is paramount.

A copy of Redstone Wealth Management's Code of Ethics is available upon request. Please contact our Chief Compliance Officer at **(405) 844-9933** or [Lee@RedStoneWM.com](mailto:Lee@RedStoneWM.com).

#### **Personal Trading Practices**

Where we provide consulting services to self-directed plans, we do not implement trades on behalf of client accounts. It is possible that Redstone Wealth Management and/or its Advisory Representatives will own, buy, or sell positions in the same securities held in these plans. However, due to the nature of services offered by our firm, we do not consider this to be a conflict of interest.

### **Item 12 - Brokerage Practices**

Redstone Wealth Management offers only consulting services to plans and does not manage plan assets. Plan fiduciaries and/or investment managers are responsible for implementation of securities transactions and custody of assets in conjunction with other plan vendors/service providers. Redstone Wealth Management may recommend various vendors/service providers at the request of the client, but clients are under no obligation to utilize the services of any particular service provider, regardless of any affiliations, relationships, or associations with Redstone Wealth Management or its affiliates or with its Associated Persons.

#### **Research and Other Soft Dollar Benefits**

We do not have any soft dollar arrangements.

#### **Brokerage for Client Referrals**

We do not receive client referrals from broker-dealers and custodians and we do not receive other benefits from a broker-dealer in exchange for client referrals.

**Directed Brokerage**

We do not direct or implement transactions in or on behalf of client accounts. Clients direct all brokerage through their chosen vendors/service providers.

**Trade Aggregation**

Since we offer only consulting services to plan clients, we do not implement transactions in client accounts.

### **Item 13 - Review of Accounts**

Accounts are reviewed by Brent Terrell, Investment Adviser Representative and Operations Manager and/or Lee Cantrell, President and Chief Compliance Officer.

Redstone Wealth Management monitors investment options on a regular basis. Additional reviews will be conducted upon client request. In accordance with the advisory agreement between the client and our firm, we will prepare quarterly and annual performance reports and meet with the client to periodically to discuss the reports and investment decisions.

Reports provided will include investment performance, consistency of fund management, and conformance to guidelines set forth in the plan. We will notify the client with any recommendations accordingly. The client will also receive regular written summary account statements directly from the account recordkeeper (or other custodian of the plan's assets) at least quarterly.

Rollover advice is reviewed with plan participants who engage us for that service at the time of engagement. Additional reviews are not applicable. Plan participants and former plan participants may engage us separately for other services as described throughout this brochure.

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

**Compensation for Client Referrals**

From time-to-time we may directly compensate non-employee (outside) individuals and/or entities (Promoters) for client referrals. In order to receive a cash referral fee from our firm, Promoters must comply with the requirements of the jurisdictions in which they operate. If you were referred to our firm by a Promoter, you should have received disclosures at the time of the referral. If you become a client, the Promoter that referred you to our firm will receive a percentage of the advisory fee you pay our firm for as long as you are a client with our firm, or until such time as our agreement with the Promoter expires. You will not pay additional fees because of this referral arrangement. Referral fees paid to a Promoter are contingent upon your entering into an advisory agreement with our firm. Therefore, a Promoter has a financial incentive to recommend our firm to you for advisory services. This creates a conflict of interest; however, you are not obligated to retain our firm for advisory services. Comparable services and/or lower fees may be available through other firms.

**Other Compensation**

We do not receive economic benefits from third parties in exchange for providing investment advice or other advisory services to plan clients.

#### **Item 15 - Custody**

We do not have physical custody of any of your funds and/or securities. We do not have the authority to deduct fees directly from plan accounts. We will either bill the client directly or the fee will be deducted from plan assets by the plan's recordkeeper or other custodian in accordance with the negotiated terms of the agreement executed between the client and our firm. Plan Participants will receive account statements at least quarterly; plan sponsors may receive copies of account statements from the custodians, or plan administrators, or other plan recordkeepers. It is the client's responsibility to review account statements for accuracy.

#### **Item 16 - Investment Discretion**

We offer consulting services only; therefore, we do not implement transactions in client accounts and we do not accept discretionary authority to manage securities accounts on behalf of clients.

#### **Item 17 - Voting Client Securities**

We do not vote proxies solicited by, or with respect to, the issuers of securities held in your account. You are responsible for voting your proxies. Typically, your account custodian will deliver proxy materials directly to you electronically or by mail depending on the option you have selected with your account custodian. If we receive your proxy materials in error, we will forward them to you in the format received. You may contact us at **(405) 844-9933** or [Support@RedstoneWM.com](mailto:Support@RedstoneWM.com) with any questions you may have regarding proxies.

#### **Item 18 - Financial Information**

Our firm does not have any financial conditions or impairments that would prevent us from meeting our contractual commitments to you. We do not take physical custody of client funds or securities, or serve as trustee or signatory for client accounts, and, we do not require the prepayment of more than \$500 in fees six or more months in advance. Therefore, we are not required to include a financial statement with this brochure.

## Privacy Notice



This notice has been provided to you in accordance with the Securities and Exchange Commission's rule regarding the privacy of consumer financial information ("Regulation S-P"). Please take the time to read and understand the privacy policies and procedures that we have implemented to safeguard your nonpublic personal information.

### **INFORMATION WE COLLECT**

Redstone Wealth Management, LLC must collect certain personally identifiable financial information about its customers to provide financial services and products. The personally identifiable financial information that we gather during the normal course of doing business with you may include:

- information we receive from you on applications or other forms;
- information about your transactions with us, our affiliates, or others;
- information we receive from a consumer reporting agency.

### **INFORMATION WE DISCLOSE**

We do not disclose any nonpublic personal information about our customers or former customers to anyone, except as permitted or required by law, or as necessary to provide services to you. In accordance with Section 248.13 of Regulation S-P, we may disclose all of the information we collect, as described above, to certain nonaffiliated third parties such as our attorneys, accountants, auditors, persons or entities that are assessing our compliance with industry standards, and with broker-dealer firms having regulatory requirements to supervise certain of Redstone Wealth's activities. We enter into contractual agreements with all nonaffiliated third parties that prohibit such third parties from disclosing or using the information other than to carry out the purposes for which we disclose the information.

Additionally, Regulation S-ID requires our firm to have an Identity Theft Protection Program (ITPP) that controls reasonably foreseeable risks to customers or to the safety and soundness of our firm from identity theft. We have developed an ITPP to adequately identify and detect potential red-flags to prevent and mitigate identity theft.

### **CONFIDENTIALITY AND SECURITY**

We restrict access to nonpublic personal information about you to those Employees who need to know that information to provide financial products or services to you. We maintain physical, electronic, and procedural safeguards that comply with federal standards to guard your nonpublic personal information.

### **ACCURACY**

We strive to maintain accurate personal information in our client files at all times. However, as personal situations, facts and data change over time; we encourage our clients to provide feedback and updated information to help us meet our goals. If have questions or need to update your information, please contact us at **(405) 844-9933** or [Support@RedstoneWM.com](mailto:Support@RedstoneWM.com).

*Effective April 2023*