



Disclosure Brochure
(Form ADV Part 2A)
March 29, 2017

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This Part 2A of Form ADV (the "Brochure") provides information about the qualifications and business practices of RMB West, LLC ("**RMB West**" "**we**" or "**Adviser**"). If you have any questions about the contents of this Brochure, please contact us at (888) 675-2289 or compliance@rmbcap.com. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission (the "**SEC**") or by any state securities authority.

RMB West is a registered investment adviser. Registration of an investment adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

Additional information about RMB West also is available on the SEC's website at www.adviserinfo.sec.gov.

MATERIAL CHANGES

There are no material changes to report as of the date of this Brochure since the Adviser's last ADV Part 2A filed on March 28, 2016.

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ITEM 4: ADVISORY BUSINESS

About RMB West

RMB West, LLC (“**RMB West**” or “Adviser”) is a Delaware limited liability company formed on April 21, 2011. Its principal owner is RMB Capital Management, LLC (“**RMB Capital**”). RMB Capital’s principal owner is RMB Capital Holdings LLC (“RMB Holdings”). Richard M. Burridge, Frederick Paulman and Walter H. Clark are the principal owners of RMB Holdings.

RMB West provides retirement solutions to its clients as further outlined below. RMB Retirement Plan Solutions is a consulting and adviser division focused on assisting organizations, to improve the performance, design and operations of retirement plans. RMB Retirement Plan Solutions tailors its consulting and advice services to meet the needs of its clients. The investment adviser representatives of RMB Retirement Plan Solutions provide certain services to Retirement Plan Sponsors and their participants related to their retirement plans (ERISA defined contribution plans and defined benefit plans). These services may include, but are not limited to, the following:

- Recommend appropriate services, service providers, and investments based on a prudent and documented fiduciary process that includes a comparison among available investments in a given asset class and/or investment style using many factors, including but not limited to, performance, risk, management, investment process, fees and style consistency. Recommended investments and services are monitored for consistency with the selection factors;
- ERISA fiduciary education and training for plan trustees;
- Investment education and individualized advice provided to Retirement Plan participants;
- Benchmarking of investment performance, plan fees, investment options, and services provided by the Plan’s service providers;
- Initiate and manage the request for proposal/search process for new service providers;
- Oversight of Plan administration and compliance procedures.

Our retirement plan solutions platform allows us to provide employee retirement plan sponsors with suggestions regarding appropriate service providers and assist with controlling costs charged to employee retirement plans. Additionally, we strive to mitigate the fiduciary risks of plan sponsor fiduciary risks.

As of the date of December 31, 2016, RMB West had \$827,127,812 in assets under advisement all of which, is non-discretionary.

Other Businesses

RMB Capital Management, LLC (“RMB Capital”) is an independent, employee-owned firm offering advisory services and investment solutions to a diverse range of clients. RMB Capital was established in Chicago, Illinois, on April 1, 2005 with a team of 19 employees. Since then, we have grown to approximately 130 employees with additional offices in Denver, Colorado; Jackson Hole, Wyoming; New York, New York and Washington, D.C. and satellite offices in North Haven, Connecticut; Skaneateles, New York; Rochester, New York; Atlanta, Georgia; Irvine, California, and Los Angeles, California.

As an independent firm, RMB Capital is able to make autonomous decisions without the influence of corporate ties or shareholder influences. Our business is structured to help ensure our clients' best interests are the driving force behind our practices and recommendations.

RMB Capital services its clients through two primary business units: Wealth Management and Asset Management. Our Wealth Management business focuses on providing holistic solutions to our client's financial needs while our Asset Management business provides separately managed accounts and other investment products that serve as the building blocks for our clients' investment portfolios.

ITEM 5: FEES AND COMPENSATION

The specific manner in which fees are charged by RMB Retirement Plan Solutions is established in a written agreement with the client and are negotiable and customized for each client. RMB Retirement Plan Solutions is compensated for its services on a fixed fee basis or on a percentage of assets of the employee benefit plan. Fees are payable in advance at the beginning of each quarter. RMB Retirement Plan Solutions does not generally charge any performance-based fees. Fees are dependent on the scope and depth of the services provided. The fee may be prorated to cover the period from either: (1) the time of execution of the advisory agreement, or (2) the effective date of the advisory agreement through the expected completion of the project or the time period covered by the advisory agreement. Clients may pay fees directly to RMB Retirement Plan Solutions or instruct their retirement plan service providers to deduct the fees from the retirement plan assets or from excess revenue generated by the retirement plan's investments.

ITEM 6: PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

RMB West does not charge any performance-based fees.

ITEM 7: TYPES OF CLIENTS

RMB West provides consulting and advisory services to employer organizations which may be for-profit or not-for-profit entities. The consulting and advisory services relate to the client's defined benefit pension plans, 401(k), 403(b), and 457 plans, profit-sharing plans, and Taft-Hartley plans. Such clients are generally considered to be institutional clients and are named fiduciaries of the retirement plans they sponsor.

ITEM 8: METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

Method of Analysis

RMB West's method of analysis follows a prudent and documented process to help ensure that a Retirement Plan Sponsor meets the requirements of the "Prudent Man Rule" (as described in ERISA §404). Investment research is based on interviews with investment managers and plan service providers and includes subscriptions to third party sources of information. Analysis includes searching databases of investment analytics and research information covering a substantial amount of investment products and securities. Such data bases are also used in the ongoing performance monitoring of investment alternatives for plan sponsors.

While RMB West has confidence in the veracity of the information they receive, there is the risk that such information contain inaccuracies which could lead to misconfigured recommendations.

Investment Strategies

The investment strategies recommended are those deemed to be appropriate, based on the Plan's objectives, for the management of the Plan's assets. Generally, open-end funds and/or other investment managers are recommended to the Plan Administrator to allow reasonable diversification among asset classes and investment styles.

Investment Selection

RMB West employs an independent process when recommending investments for client plans that mitigates most conflicts of interest and reduces risk and liability. First, we work with our clients to understand their investment objectives for their employee investment options related to their plan. Next, we review the universe of investment options available to start our screening process. Our screening process includes:

1. Review investments in our analytic system and remove any mutual funds that are not scoring appropriately (i.e. generally less than 7 in our 10 point scoring system);
2. Complete additional quantitative analysis to identify finalists to be recommended to the Plan Administrator. This recommendation includes factors specific to the category of mutual funds requested by the Plan Administrator;
3. Qualitative screening that includes an interview with the portfolio manager for the potential mutual fund to help us evaluate the portfolio manager's skills and identify any other potential issues.

We feel our evaluation and diligence process leads to employee investment options that meet the attributes and investment objectives required by the Plan Administrator. As part of this process, we document the rationale for these recommendations in order to help the Plan Administrator meet its fiduciary obligations. In addition to the above, RMB West also monitors these recommendations quarterly to help ensure that we take action quickly if necessary. RMB West does not imply, represent, or warrant that its services or its methods of analysis can or will predict future results, identify market tops or bottoms, or insulate clients and their plan participants from losses due to major market corrections, crashes, or detect negligence on the part of the manager of an open-end fund or separately managed account.

RMB West, from time to time, may use the services of an affiliate, RMB Capital, to assist in RMB West's due diligence process. No guarantees are provided that a client's goals or objectives or those of its plan participants can or will be achieved.

Cybersecurity

RMB West's information and technology systems may be vulnerable to damage or interruption from computer viruses, network failures, computer and telecommunication failures, infiltration by unauthorized persons and security breaches, usage errors by its professionals, power outages and catastrophic events such as fires, tornadoes, floods, hurricanes and earthquakes. Although RMB West has implemented various measures to protect the confidentiality of its internal data and to manage risks relating to these types of events, if these systems are compromised, become inoperable for extended periods of time or cease to function properly, RMB West may have to make a significant investment to fix or replace them. The failure of these systems and/or of disaster recovery plans for any reason could cause significant interruptions

in RMB West's operations and result in a failure to maintain the security, confidentiality or privacy of sensitive data, including personal information relating to clients. Such a failure could harm RMB West's reputation or subject it or its affiliates to legal claims and otherwise affect their business and financial performance. RMB West will seek to notify affected clients of any known cybersecurity incident that may pose substantial risk of exposing confidential personal data about such clients to unintended parties

Risk of Loss

Investing in securities involves risk of loss that clients must assess and must be prepared to bear.

There can be no assurance that the methods described above will be successful or that clients will not suffer losses. Investing in securities involves risk of loss that clients should be prepared to bear.

ITEM 9: DISCIPLINARY INFORMATION

RMB West is required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of it or the integrity of its management. At this time, RMB West has no information applicable to this section.

ITEM 10: OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

RMB West is affiliated with RMB Capital. RMB Retirement Solutions is a division of RMB West which is affiliated with RMB Capital. The Managing Director-Western Region, Donald Bechter and all of the employees working for RMB West are employees of RMB Capital.

RMB West and its principals may have a conflict of interest between RMB West's interest in recommending service providers for clients and RMB West's interest in selecting its affiliate RMB Capital to provide such services. RMB West has procedures designed and implemented to mitigate any conflicts of interest resulting from its affiliation with RMB Capital.

RMB Capital Managed Private Funds

RMB Capital has affiliated entities that serve as the general partner or investment manager of certain private funds managed by RMB Capital. South LaSalle Managers LLC, Iron Road Capital Partners LLC, RMB Rail-Splitter Managers LLC, RMB Logan Stone Managers LLC and RMB Mendon Managers LLC are all general partners and/or investment managers of a fund family managed by RMB Capital and its employees.

Outside Directorships and Other Management Positions of RMB Capital

A portfolio manager and assistant portfolio manager for our long/short equity financials strategy each serve as a member of the board of directors for a community bank. Each community bank is owned by the family of private funds managed by them and they each serve as a director, in part, to monitor these investments. Any compensation earned by them as members of the board of directors are paid to the private funds they manage.

An employee of RMB Capital who is a portfolio manager of the long/short equity strategy and long only equity strategy serves as a director of a hedge fund fund-of-funds and receives compensation relating to his directorship. Additionally, the employee serves as an advisor to a family office investment management firm and receives fees associated with this role.

Dual Employee Relationship of RMB Capital

Mendon Capital Advisors Corp. ("MCAC") serves as the sub-adviser to RMB Mendon Financial Services Fund and RMB Mendon Financial Long/Short Fund. MCAC's sole employee is also an employee of RMB Capital. This employee is also the sole owner, director and Chief Investment Officer of MCAC. RMB Capital also provides back office, compliance and other administrative services to MCAC.

RMB West and its principals have no other financial industry activities or affiliations except as described in this item.

ITEM 11: CODE OF ETHICS

Code of Ethics

RMB Capital has adopted a Code of Ethics for all supervised persons of RMB Capital describing its high standard of business conduct and fiduciary duty to clients. The Code of Ethics includes provisions relating to personal securities trading procedures and employee reporting and attestations, among other things. All supervised persons at RMB Capital must acknowledge the terms of the Code of Ethics as a new employee, annually, or as amended.

Personal Trading

From time to time, employees or related persons of RMB Capital may invest in securities that are also held in client accounts. All transactions in these and other securities must comply with RMB Capital's Code of Ethics, a copy of which is available by request. The Code of Ethics requires, among other things, that employees and related persons of RMB Capital:

- Are limited in their ability to trade in such securities if RMB Capital is trading for client accounts on the same day;
- Must report all personal trading and accounts to RMB Capital's Compliance Department to review compliance with these standards;
- Must hold any securities purchased for their personal accounts for a minimum period.

Employee accounts are segregated from client accounts and are generally traded after all client trading is completed for the day.

In certain circumstances and upon written request, RMB Capital may permit transactions in a security that would otherwise be prohibited under RMB Capital's Code of Ethics.

Participation or Interest in Client Transactions

Employees of RMB West, through RMB Capital, may introduce their clients to private funds managed by RMB Capital. In addition to management fees, RMB Capital may earn incentive allocations or incentive fees from certain private funds managed by RMB Capital. In addition, RMB Capital will provide the client with a PPM for each private fund which outlines, among other things, the risks, fees, and conflicts of interest related to the private fund. Ultimately, clients retain final discretion with respect to making an investment into a private fund.

RMB West, through RMB Capital, may also introduce their clients to mutual funds that it manages. RMB has a financial incentive to recommend the mutual funds it manages, however, it will consider whether the mutual fund(s) is an appropriate investment for the client.

RMB West and RMB Capital do not directly buy or sell for itself securities that it also recommends to clients, but accounts sponsored by RMB Capital, including its 401(k) plan, may

hold such securities. Any transactions in this plan that are directed by employees would be subject to RMB Capital's Code of Ethics. RMB West's clients and prospective clients may request a copy of RMB Capital's Code of Ethics by contacting its Compliance Department at (312) 993-5800 or compliance@rmbcap.com.

ITEM 12: BROKERAGE PRACTICES

RMB West assists its clients with the selection of retirement plan services providers which may also be registered broker-dealers. RMB West's evaluation and subsequent recommendation of such a service provider is based solely on the entity's capabilities as a third-party administrator or recordkeeper and not on the entity's trading capabilities. RMB West does not receive any soft dollar payments or other benefits from any broker-dealer.

ITEM 13: REVIEW OF ACCOUNTS

RMB West periodically monitors investments recommended to clients and provides periodic reports each year summarizing the client's retirement plan design, investment performance, and advisory fees. RMB West generally meets with clients on an annual, semi-annual or, quarterly basis, depending on the client's preference, to review the recent period's data, recommended changes and discuss possible changes in the client's investment objectives and needs. Clients must inform RMB West of any interim changes that would indicate a need to change investment recommendations.

ITEM 14: CLIENT REFERRALS AND OTHER COMPENSATION

RMB West may refer clients to its affiliate, RMB Capital. Currently, RMB West does not receive additional compensation for such referrals.

ITEM 15: CUSTODY

RMB West does not have custody or any other form of access to clients' assets or the assets of the ERISA Plans sponsored by clients. Such assets are held by the custodian of the Plan for the exclusive benefit of the Plan participants.

ITEM 16: INVESTMENT DISCRETION

RMB West does not have discretionary authority for the selection of any securities or other investments for client accounts. When recommending investments, RMB West observes the investment policies, limitations and restrictions of the clients or the Plans it advises. The selection of Plan investments is generally subject to the approval of Plan Trustees. For most retirement savings plans, the Plan participants direct the investment of their funds. The Plan's investment guidelines and restrictions must be provided to RMB West in writing.

ITEM 17: VOTING CLIENT SECURITIES

RMB West will not provide proxy voting services on behalf of clients, unless required to do so by law (interpretations of ERISA may require investment managers to vote proxies as part of their duties to the Plan). RMB West may provide general consulting services to help the client understand its responsibilities relating to proxy voting. All proxy notices are sent directly to the client.

ITEM 18: FINANCIAL INFORMATION

Registered investment advisers are required in this section to provide you with certain financial information or disclosures about RMB West's financial condition. RMB West has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

PRIVACY POLICY March 2017

FACTS	WHAT DOES RMB CAPITAL MANAGEMENT, LLC (“RMB”) DO WITH YOUR PERSONAL INFORMATION?		
WHY?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.		
WHAT?	The types of personal information we collect and share depend on the product or service you have with us. This information can include: <ul style="list-style-type: none">▪ Social security number▪ Income and Assets▪ Investment Experience▪ Risk tolerance▪ Transaction history▪ Account Balances		
HOW?	All financial companies need to share customers’ personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers’ personal information; the reasons RMB chooses to share; and whether you can limit this sharing.		
Reasons we can share your personal information		Does RMB Share?	Can you limit this sharing?
For our everyday business purposes - such as to process your transactions, maintain your accounts(s) or respond to court orders and legal investigations.		Yes	No
For our marketing purposes - to offer our products and services to you		Yes	Yes
For joint marketing with other financial companies		No	We don’t share
For our affiliates’ everyday business purposes - information about your transactions and experiences		Yes	No
For our affiliates’ everyday business purposes – information about your creditworthiness		No	We don’t share
For our affiliates to market to you		Yes	Yes
For non-affiliates to market to you		No	We don’t share
To limit our sharing	Call toll free: 1-800-601-5228 Please note: If you are a <i>new</i> customer, we can begin sharing your information 30 days from the date we sent this notice. When you are <i>no longer</i> our customer, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.		
Questions?	Call toll free 1-800-601-5228 or visit www.rmbcap.com or www.rmbfunds.com . <div>Continued</div>		

Privacy Policy, continued	
Who we are	
Who is providing this notice?	RMB Capital Management, LLC, RMB West, LLC, Iron Road Capital Partners, LLC, RMB Mendon Managers LLC, RMB Logan Stone Managers LLC, South LaSalle Managers, LLC, RMB Rail-Splitter Managers LLC and RMB Investors Trust
What we do	
How does RMB protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
How does RMB collect my personal information?	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> ▪ Enter into an investment advisory contract ▪ Open an account ▪ Tell us about your investment or retirement portfolio ▪ Provide your employment information ▪ Show your Driver's license information
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> ▪ sharing for affiliates' everyday business purposes – information about your creditworthiness ▪ affiliates from using your information to market to you ▪ sharing for non-affiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing.</p>
What happens when I limit sharing for an account I hold jointly with someone else?	Your choices will apply to everyone on your account - unless you tell us otherwise.

Privacy Policy, continued	
Definitions	
Affiliates	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ▪ <i>RMB West, LLC</i> ▪ <i>Iron Road Capital Partners, LLC</i> ▪ <i>South LaSalle Managers, LLC</i> ▪ <i>RMB Mendon Managers LLC</i> ▪ <i>RMB Logan Stone Managers LLC</i> ▪ <i>RMB Rail-Splitter Managers LLC</i> ▪ <i>RMB Investors Trust</i>
Non-affiliates	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ▪ <i>RMB Capital Management doesn't share with non-affiliates so they can market to you.</i>
Joint Marketing	<p>A formal agreement between non-affiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> ▪ <i>RMB Capital Management doesn't jointly market.</i>