

PART 2A

Item 1 – Cover Page

Ridgeview Asset Management Partners, LLC **March 2018**

This brochure provides information about the qualifications and business practices of Ridgeview Asset Management Partners, LLC (“Ridgeview”). If you have any questions about the contents of this Brochure, please contact us by email at robinson@ridgeviewasset.com or by telephone at 914-925-3411.

Ridgeview is a registered investment adviser with the U.S. Securities and Exchange Commission (“SEC”). The information in this Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment adviser does not imply any specific level of skill or training. This brochure provides information about Ridgeview to assist you in determining whether to retain Ridgeview.

Additional information about Ridgeview is available on the SEC’s website at www.adviserinfo.sec.gov by searching for our firm name or by our CRD #283786.

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Item 2 – Material Changes

Form ADV 2 is divided into two parts: *Part 2A (the "Brochure")* and *Part 2B (the "Brochure Supplement")*. The Brochure provides information about a variety of topics relating to Ridgeview's business practices and conflicts of interest. The Brochure Supplement provides information about advisory personnel of Ridgeview.

Material Changes

Material changes have been made in various sections of the Brochure to reflect the addition of Executive Chairman, John W. Watkins, and a secondary office located at 900 Larkspur Landing, Suite 260, Larkspur, CA 94939.

Future Changes

From time to time, we may amend this Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators.

At any time, you may view the current Brochure on-line at the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching for our firm name or by our CRD #238786. You may also request a copy of this Brochure at any time, by contacting us by email at robinson@ridgeviewasset.com or by telephone at 914-925-3411.

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Item 4 – Advisory Business

The Firm and its Principal Owner

Ridgeview Asset Management Partners, LLC is a Delaware limited liability company, which commenced operations in November 2016. Ridgeview's primary office is located at 411 Theodore Fremd, Suite 206 South, Rye, New York, and a secondary office located at 900 Larkspur Landing, Suite 260, Larkspur, CA 94939.

Ridgeview Asset Management Partners, LLC ("Ridgeview") is a registered investment adviser with the U.S. Securities and Exchange Commission ("SEC"). Ridgeview is owned by Michael W. Robinson and John W. Watkins. Mr. Robinson serves as the Chief Investment Officer ("CIO") of Ridgeview. Mr. Watkins serves as the Executive Chairman ("EC") of Ridgeview.

Types of Services

Ridgeview offers customized investment advisory services to high net worth individuals, families, trusts, foundations and endowments (referred to herein as "Clients"). Ridgeview advises Clients regarding the allocation of their investment portfolio. Ridgeview generally directs its Clients' assets through a rules-based, risk-controlled investment strategies developed after close consultation and review of each Client's risk profile and financial situation. Client assets are generally allocated to a broad range of global asset classes which may include, but not be limited to U.S. and non-U.S. equities, U.S. government, agency, municipal and corporate bonds, money market instruments, commodities, and exchange traded funds ("ETFs"). Ridgeview may, in its discretion, partner with various analytics and trading providers ("Provider") to implement its allocation decisions across differing asset classes.

Level of Services Provided to Clients

Ridgeview works with each of its Clients to evaluate their financial goals and objectives, as well as their risk tolerance to recommend an allocation Ridgeview believes is appropriate for each Client. Each Client portfolio is customized based on each Client's risk/return profile, as well as financial goals and objectives.

Ridgeview's philosophy is to provide efficient returns after fees and, when applicable, after taxes taking into consideration each Clients' needs. Ridgeview seeks to maximize net returns after taxes through loss harvesting programs when available and given different expected levels of risk, which is generally measured by the expected potential risk of losses and size of losses in Client accounts.

Ridgeview's investment process is most suitable for Clients with a long-term time horizon. However, Client portfolios are rebalanced as underlying benchmark portfolios are rebalanced (typically quarterly), in response to market conditions, to maximize diversification, and to harvest losses for tax purposes in taxable accounts.

Assets Under Management

Ridgeview manages approximately \$112 million on behalf of its Clients and its CIO and EC. Mr. Robinson and Mr. Watkins manage a significant amount of their investable assets generally alongside Client accounts. Ridgeview has full discretion to trade cash and securities in all Client accounts.

Item 5 – Fees and Compensation

Management Fees

Ridgeview charges its clients an asset-based management fee (“Management Fee”), which is based on a sliding scale. As assets under management increase for each Client, the management fee percentage incrementally decreases from 0.80% per annum.

Ridgeview may in its own discretion waive or reduce the Management Fee. Lower fees may be available from other firms providing similar advisory services.

Calculation and Payment of Management Fees

Management Fees are calculated and billed by Ridgeview quarterly in arrears based on the market value of the assets managed by Ridgeview as of the last business day of each calendar quarter (Calculation Date). Management Fees are deducted from each Client’s account by Ridgeview generally within five (5) days after the Calculation Date.

Management Fees are charged pro-rata for periods less than a calendar quarter based on the number of days the Client’s assets were managed by Ridgeview.

Additional Fees and Expenses

In addition to the Management Fees charged by Ridgeview, each Client pays advisory fees to the Provider(s) responsible for executing the allocations in each asset class. These additional fees are calculated by the Provider and payable by the investor to the Provider quarterly in arrears or as stated otherwise in a contract with a Provider. Each Provider’s fee schedule may vary; however, Clients typically pay a lower fee rate on larger asset balances. A Provider may also charge Clients a minimum account fee for its services. The Provider’s fees are billed by the Provider and paid by directly by each Client and may be deducted from Ridgeview’s fees.

Separate from the advisory fees charged by the Provider, each Client also pays brokerage fees, transaction fees, mutual fund expenses, ETF expenses, custodial fees and other related costs and expenses, which may be generally charged by the broker and custodian of each Client’s assets.

Compensation for Sale of Securities or Other Investment Products

Ridgeview does not receive compensation for securities transactions or Provider services related to any Client account or any other fees other than the Management Fees charged for its advisory services. Ridgeview may collect fees on behalf of a Provider, but does not keep or share in any of those fees and collects those fees to simplify billing. Any fees paid by a Client to Ridgeview on behalf of a Provider are promptly paid to the Provider by Ridgeview.

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

Performance-Based Fees

Ridgeview does not charge performance-based fees for its investment advisory services.

Side-By-Side Management

Ridgeview provides investment advisory services to clients through separately managed accounts (“SMAs”). In managing each Client’s account, Ridgeview establishes investment objectives and portfolio management guidelines specific to each Client. Potential types of conflicts of interest may arise between Clients. For example, Ridgeview has an incentive to allocate more resources to its largest clients who pay Ridgeview the largest fees for similar advisory services compared to other Ridgeview Clients. This is mitigated by Ridgeview’s policies and procedures which are designed to treat the execution of all Client’s trades in an equitable manner. Examples of other conflicts may include, but are not limited to, the amount of time and investment ideas allocated to each SMA, orders that may not be fully executed on the same day between SMAs, or trades executed in one SMA that may adversely impact the value of securities held by another SMA. Ridgeview executes many of its equity trades associated with Provider-run portfolios (as discussed in more detail below) “mark on close”, which is the closing daily market price of each security, to ensure equal treatment and minimize any conflicts. In addition to customizing the investment allocation for each Client, Ridgeview has developed allocation procedures for treating each Client in a fair manner.

Item 7 – Types of Clients

Ridgeview offers its advisory services to high net worth individuals, families, trusts, foundations and endowments. Ridgeview's minimum account size is \$5 million. Ridgeview may waive this minimum in its sole discretion.

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

Method of Analysis and Investment Strategies

Ridgeview offers customized investment advisory services. Ridgeview invests Client assets in a broad range of global asset classes which may include, but not be limited to U.S. and non-U.S. equities, U.S. government, agency, municipal and corporate bonds, money market instruments, commodities, and exchange traded funds (“ETFs”). Ridgeview may also provide advice to Clients on various private investments/private placements, although it does not charge for such services.

Ridgeview works with each of its Clients to evaluate their financial goals and objectives, as well as their risk tolerance to recommend an allocation Ridgeview believes is appropriate for each Client. Each Client portfolio is customized based on each Client’s risk/return profile, as well as financial goals and objectives. Ridgeview takes into consideration each Client’s income requirements, tax jurisdiction, tax status, investment policy and any other relevant factors.

Ridgeview employs both empirical and qualitative methods in determining the mix of assets for each Client. The firm seeks to maximize returns net of fees, taxes and costs relevant to each Client’s risk profile. Ridgeview invests Client assets with a long-term time horizon.

Ridgeview utilizes various investment strategies, some of which are implemented by one or more Provider, which use structured, mathematical and rules-based methodologies and proprietary technology to make best efforts to maximize risk-adjusted returns after fees, expenses, and taxes. While qualitative assessments and human judgments are important checks on the investment process, Ridgeview rarely strays from its disciplined rules and goals. We believe that strict adherence to the investing rules controls against style-drift and helps better manage costs. Additionally, Ridgeview believes rules-based programs are the best way to achieve maximum risk adjusted returns for its Clients.

Ridgeview utilizes software programs and algorithms to benchmark the performance of broad asset class returns while preserving tax efficiency and the ability to more precisely tailor portfolios to individual Clients. For the Provider implemented strategies, Ridgeview does not seek to beat market based returns or composite index performance within each asset class through the high cost selection of individual securities. However, Ridgeview selects its portfolios based on the expected results of the rules-based investment programs.

Ridgeview’s fixed income investments are based on each Client’s specific needs and guidelines related to their tax position. Bonds are evaluated on factors generally including maturity date, yield, rating, sources of payment and other relevant factors. Ridgeview does not perform direct credit analysis in an effort to predict undervalued securities. Fixed income exposures are developed to achieve the lowest cost and most suitable exposures for a given credit quality and bond type.

Ridgeview may partner with certain Providers in each of the underlying asset classes in order to manage costs, provide better inventory of securities, utilize the most advanced technology platforms and take advantage of the newest products in an ever-evolving market place.

Risk of Loss

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. There is no guarantee that Clients will meet their investment goals. All assets may fluctuate in value due to a variety of factors including, but not limited to interest rates, economic conditions, equity market conditions, credit market conditions, commodity prices, foreign exchange rates, geopolitical factors, forces majeure and other factors Ridgeview cannot control. Ridgeview seeks to minimize the risk of individual securities selection by creating broad baskets of securities in each asset class. There is no guarantee that Ridgeview's judgments and decisions about allocations to specific asset classes will produce the intended results. Moreover, as with any investment program and philosophy there is no guarantee of investment results. In fact, Clients can still lose substantial portions of their assets following a rules-based investment program recommended by Ridgeview.

As an accommodation to Clients, Ridgeview may hold legacy positions in certain funds, ETFs, or individual securities positions.

Summary of Material Risks

Investing in equity and fixed income securities involves certain risks including the risk of loss. The following list is not intended to be an exhaustive list of potential risks of investing in equity and fixed income securities, nor following the investment program suggested by Ridgeview.

Equity Investments

Client assets may be invested at any time in equity securities including common stocks, preferred stocks, convertible securities and warrants. These securities may be traded on major stock exchanges, the NASDAQ (National Market System, small cap and bulletin board), foreign exchanges or regional stock exchanges. Although equity securities have a history of long-term growth in value, their prices fluctuate based on changes in the issuer's financial condition and prospects and on overall market and economic conditions. Clients' accounts may be invested not only in securities of issuers with large market capitalizations, but also in securities of medium-cap, small-cap and micro-cap companies. Smaller companies often have limited product lines, markets or financial resources, and may depend on one or few key persons for management. The securities of such companies may be subject to more volatile market movements than securities of larger, more established companies, both because the securities typically are traded in lower volume and because the issuers typically are more subject to changes in earnings and prospects.

Fixed Income Investments

Fixed income securities are subject to the risk of an issuer's ability to meet principal and interest payments on the obligation (credit risk), and may also be subject to price volatility due to such factors as interest rate sensitivity, market perception of the creditworthiness of the issuer and general market liquidity (market risk). The market values of fixed income securities tend to vary inversely with the level of interest rates. Yields and market values of fixed income securities fluctuate over time, reflecting not only changing interest rates but the market's perception of credit quality and the outlook for economic growth.

Lower rated or unrated (i.e., high yield) securities are more likely to react to developments affecting market and credit risk than are more highly rated securities, which primarily react to movements in the general level of interest rates. Lower rated securities are defined as securities below the fourth highest rating category by a nationally recognized statistical rating organization. Such obligations are speculative and may be in default. Ridgeview may invest Client assets in such 'high yield' securities. In addition, Ridgeview may invest Client accounts in unrated securities. When economic conditions appear to be deteriorating, medium to lower rated securities may decline in value due to heightened concern over credit quality, regardless of prevailing interest rates. Investors should carefully consider the relative risks of investing in high yield securities and understand that such securities are not generally meant for short-term investing.

Exchange Traded Funds (ETFs)

Ridgeview may invest Client accounts in exchange-traded funds ("ETFs"), which are a type of index fund bought and sold on a securities exchange. An ETF trades like common stock and represents a fixed portfolio of securities designed to track a particular market index. Ridgeview could purchase an ETF to temporarily gain exposure to a portion of the U.S. or a foreign market while awaiting purchase of underlying securities. The risks of owning an ETF generally reflect the risks of owning the underlying securities they are designed to track, although lack of liquidity in an ETF could result in it being more volatile. ETFs have management fees that increase their costs. ETFs are also subject to other risks, including: (a) the risk that their prices may not correlate perfectly with changes in the underlying index; and (b) the risk of possible trading halts due to market conditions or other reasons that, in the view of the exchange upon which an ETF trades, would make trading in the ETF inadvisable. An exchange-traded sector fund may also be adversely affected by the performance of that specific sector or group of industries on which it is based.

Concentration of Investments

Ridgeview makes best efforts to invest each Client account in a diversified portfolio of securities according to the Client's risk profile. While Clients can expect to hold a diversified portfolio of investments, diversification does not preclude a Client from losing money, whether the Client is invested in equity securities or fixed income securities.

Portfolio diversification is a key tool for managing risk, but does not eliminate risk of loss.

Leverage

The use of leverage by buying securities on margin is a speculative technique that involves special risk considerations. Interest costs on borrowings may fluctuate with changing market rates of interest and may partially offset or exceed the return earned on borrowed funds. Interest on borrowings will be an expense of the Client and will affect the investment performance of the accounts in which leverage is employed. To the extent a Client account is leveraged, the value of its assets will tend to increase more when its portfolio securities increase in value, and to decrease more when its portfolio securities decrease in value, than if its assets were not leveraged.

Any lenders to a Client account are entitled to receive payments of interest or repayments of principal. Consequently, Ridgeview might have to sell portfolio securities to meet interest or principal payments at a time when fundamental investment considerations would not favor such sales. Also, the terms of any borrowings may contain provisions that limit certain activities of the Client including for example, the ability to make cash withdrawals.

Ridgeview will not directly use leverage in any of its Client accounts. As an accommodation, Ridgeview may manage leverage for Client's that have separately established it.

Highly Volatile Markets

The prices of Clients' investments can be highly volatile. Price movements of equities, fixed income, ETFs, commodities, including those investments which may be made in markets outside the United States of America, such as emerging markets, are influenced by, among other things, interest rates, changing supply and demand relationships, trade, fiscal, monetary and exchange control programs and policies of governments, and national and international political and economic events and policies. In addition, governments from time to time intervene, directly and by regulation, in certain markets, particularly those in currencies, financial instruments and interest rate-related securities. Such intervention often is intended directly to influence prices and may, together with other factors, cause such markets to move rapidly in the same direction because of, among other things, interest rate fluctuations. Moreover, since internationally there may be less government supervision and regulation of worldwide stock exchanges and clearinghouses than in the United States, Client accounts may also be subject to the risk of the failure of the exchanges on which their positions trade or of their clearinghouses, and there may be a higher risk of financial irregularities and/or lack of appropriate risk monitoring and controls.

Foreign Investment Considerations

There are risks associated with investments in securities of foreign companies, which add to the usual risks inherent in domestic investments. Such risks may include fluctuations in foreign exchange rates (against which Ridgeview may not hedge), political or

economic instability in the country of issue, and the possible imposition of exchange controls or other laws or restrictions. In addition, securities prices in foreign markets are generally subject to different economic, financial, political and social factors than are the prices of securities in United States markets. With respect to some foreign countries there may be the possibility of expropriation or confiscatory taxation, limitations on liquidity of securities or political or economic developments that could affect the foreign investments of Client accounts. Moreover, less information may be publicly available concerning certain of the foreign issuers of securities held by Clients than is available concerning U.S. companies. Foreign companies are also generally not subject to uniform accounting, auditing and financial reporting standards or to practices and requirements comparable to those applicable to U.S. companies.

Economic Conditions

Changes in economic conditions, including, for example, interest rates, credit availability, inflation rates, industry conditions, government regulation, competition, technological developments, political and diplomatic events and trends, tax and other laws and innumerable other factors, can affect Clients' investments and prospects materially and adversely. None of these conditions is within Ridgeview's control and it may not anticipate these developments. These factors may affect the volatility of securities prices and the liquidity of the Clients' investments. Unexpected volatility or illiquidity could impair the Clients' profitability or result in losses.

Economic conditions also affect Clients' investment in fixed income securities. For example, an increase in overall interest rates will depress the investment value and consequently the price of any bonds that Clients hold. The value of these securities also may be affected by nonpayment of interest due on them, or liquidation or dissolution proceedings with respect to their issuers.

Insolvency of Brokers, Providers or Others

Client accounts are subject to the risk that the brokerage firms, that execute its trades, the clearing firms that such brokers use, the clearing houses of which such clearing firms are members, or the Providers that own the algorithms used for modeling portfolios determining which securities in which to invest for each Client, become insolvent. In such event, the assets in the Fund's account may become subject to the claims of general creditors of any such insolvent brokerage firm.

Dependence on Michael Robinson and John W. Watkins

Michael Robinson and John W. Watkins are primarily responsible for managing the Clients' investment portfolios. Although there is a plan in place for an orderly wind down of Ridgeview in the absence of both Mr. Robinson and Mr. Watkin, no assurance exists that a suitable replacement could be found if only one of either Mr. Robinson or Mr. Watkins becomes unavailable for any reason.

Potential Conflicts of Interest

Ridgeview is accountable to each Client as a fiduciary and, consequently, must exercise good faith and integrity in managing Client accounts involving potential and actual conflicts of interest. This duty exists in addition to the various duties of, and limitations

on Ridgeview as set forth in the Investment Management Agreement. Ridgeview will endeavor to conduct the affairs of its business in a manner fully consistent with their fiduciary obligations, and to ensure that any conflicts of interest are resolved in a fair manner.

Because Ridgeview and its officers and employees may engage in other securities investment activities and businesses, including the management of trading accounts on their own behalf, conflicts of interest may arise among Clients and these persons. Ridgeview is not obligated by contract to buy, sell or recommend for any one Client any security or other investment that may be bought, sold or recommended for other clients or for the Investment Manager's own or related persons' account, but Ridgeview will fairly allocate investments in the event of an actual conflict.

Orders on behalf of one or more Client may be "bunched" with the orders of Ridgeview, its officers or its other clients. This practice may result in one Client obtaining a better average trade price and lower commission charge than might otherwise be available to Clients without such bunching. This practice may also result in Ridgeview obtaining a less advantageous trade price.

Rules-based Methodology Does Not Guarantee Results

Ridgeview can employ a mathematical rules-based approach to its investing strategy and on behalf of its Clients; however, there is no guarantee that a rules-based approach will result in better investment performance or lower fees, costs, or taxes, than as compared to an investment strategy based on any other philosophies or methodologies.

Item 9 – Disciplinary Information

Ridgeview and its CIO and Executive Chairman have no disciplinary history, such as criminal or civil actions in courts, administrative proceedings of the SEC or other federal or state regulatory agencies, or proceedings with self-regulatory organizations.

Item 10 – Other Financial Industry Activities and Affiliations

Ridgeview has no other financial industry activities and affiliations.

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

Code of Ethics

Ridgeview has adopted a written code of ethics that is applicable to all employees, particularly employees with access or knowledge of Clients' investments ("Access Persons"). Among other things, the code requires Ridgeview and its employees to act in Clients' best interests, abide by all applicable regulations, and follow Ridgeview's personal securities transactions policy. It is the obligation of Ridgeview employees to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. Ridgeview puts the interest of its Clients ahead of its own. Ridgeview's restrictions on personal securities trading apply to all employees, as well as employees' family members living in the same household. A copy of Ridgeview's code of ethics is available upon request.

Ridgeview's Code of Ethics generally includes the following general principles:

- Ridgeview owes a fiduciary obligation to all clients, and therefore, Ridgeview's Access Persons have a duty to act in a manner that supports this obligation.
- Access Persons have the duty at all times to place the interests of all Clients first and foremost.
- Access Persons must refrain from taking inappropriate advantage of their positions with Ridgeview.
- Access Persons must conduct their securities transactions in personal accounts in a manner that avoids conflicts or the appearance of conflicts of interest, or abuses of their position of trust and responsibility.
- Access Persons must avoid actions or activities that allow (or appear to allow) them or their immediate families to benefit from their positions with Ridgeview, at the expense of Clients, or that bring into question their independence or judgment.
- Access Persons must comply with all applicable Federal Securities Laws.

Ridgeview's employees are required to certify their compliance with the Code of Ethics on annual basis.

Any proposed employee transaction involving reportable transactions such as entering into an engagement with a Provider or making an investment in a private placement, requires preclearance. In order to ensure avoidance of any potential conflicts of a Client's trade flow, employee preclearance will include a 24 hour hold period before and after approval has been granted to the employee to execute a transaction. Since some

trades are executed “mark on close”, traditional front running is not applicable as a potential conflict in some client accounts. Ridgeview believes that any potential conflict with Clients is mitigated by the fact that the majority of Client portfolios are constructed to mimic indices and are therefore highly diversified and not reliant on any specific security. Further, Ridgeview has limited exposure to small cap equities and other thinly traded securities. It is Ridgeview’s policy that if a conflict arises, the instance will be resolved in the favor of the Client to the full extent that is possible given the specific circumstances, and that appropriate measures will be taken to document to issue, add new policies and procedures where relevant, and enforce the matter with all employees of Ridgeview.

Recommending, or Buying or Selling for Client Accounts, Securities in which Ridgeview or its Related Persons Have Material Financial Interests

Ridgeview does not act as principal in any transactions. Ridgeview has adopted a personal trading policy and procedure to protect against these material conflicts. No employee of Ridgeview is permitted to transact in any security to the detriment of any Client or Investor.

Investment in the Same Securities or Related Securities that Ridgeview or its Related Persons Recommend to Clients

Ridgeview’s employees are generally encouraged to engage with one or more of Ridgeview’s Providers permitted to trade alongside Client accounts.

Recommending or Buying or Selling for Client Accounts, Securities at or about the Same Time Ridgeview or its Related Persons Buy or Sell the Same Securities for Their Own Accounts.

Ridgeview and its related persons do not enter into securities transactions with Clients. Employees are encouraged to invest side by side along with Clients and in Ridgeview’s strategy by following one or more Providers. Notwithstanding anything in this Section, Ridgeview employees investing through a Provider similar to a Client, may rebalance their own portfolio alongside Client portfolios generally obtaining the same market closing prices as a Client.

Item 12 – Brokerage Practices

Ridgeview arranges for its Clients assets to be held with Fidelity Investments, Northern Trust, or another qualified custodian. Ridgeview believes these custodians offers comparably good service at a reasonable price. Ridgeview primarily purchases securities in Clients' accounts to reconstruct one or more underlying indices, such as the equities of the companies in the S&P 500. Ridgeview uses the models and algorithms from one or more Provider to tilt the weightings of each underlying index in a manner Ridgeview believes is prudent and will lead to higher returns for Clients. In general, Ridgeview is making similar transactions for each Client. For example, Ridgeview rebalances each Client's account generally following the re-balancing of a market index, which is generally on a quarterly basis. Since each individual security is only a small portion of a larger basket of purchases and/or sales, and its sizing is formulaically driven, the risk of one Client being disadvantaged over another regarding individual security purchases is greatly diminished.

Soft Dollars

Ridgeview does not participate in soft dollar programs sponsored or offered by any broker-dealer.

Brokerage Referrals

Ridgeview does not receive compensation from third parties in connection with the recommendation of establishing a brokerage account.

Directed Brokerage

Ridgeview places trades on behalf of Clients within the established account(s) at the custodian. Ridgeview does not engage in any principal transactions (i.e., trade of any security from or to Ridgeview's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's accounts). A Client may request the use of one or more custodians, however, Ridgeview makes best efforts to group all of its Client accounts with the same qualified custodian.

Aggregating and Allocating Trades

The primary objective in placing orders for the purchase and sale of securities is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the broker. Ridgeview makes best efforts to aggregate Client trades where possible, however, given the nature of trading across a large portion of an entire index for Client accounts, there will be instances where aggregating Client trades in an individual security will not be possible. In such circumstances, Ridgeview has adopted equitable allocation procedures to ensure that no one Client is consistently advantaged or disadvantaged to the detriment or benefit of another Client. Although equal execution will not be guaranteed when orders are not aggregated for the same security, Ridgeview will endeavor to ensure that all Clients are treated fairly. Clients participating in a bunched order receive the same average price and incur trading costs that are the same as or lower than what would be

paid if they were trading individually. Ridgeview will execute its transactions through an unaffiliated broker-dealer.

Best Execution Reviews

On at least an annual basis Ridgeview evaluates the pricing and services offered by its broker partners and other trading counterparties with those offered by other reputable firms. Ridgeview does not receive any services or compensation from its broker partners so the best price and execution drive partner selection.

Item 13 – Review of Accounts

Accounts under Ridgeview's management are generally monitored on a daily basis by the CIO and EC. The CIO and EC may or may not review each Client account on any given day; however, the CIO and EC observe general conditions in securities markets as they relate to Client portfolios. The accounts are reviewed with each Client on a quarterly basis or as needed when Client investment objectives or needs have changed or when other externalities, for example, major economic, political, or environmental events, may have occurred.

Mr. Robinson and Mr. Watkins review summary reports to identify accounts outside the expected ranges for returns, exposure to asset classes, and exposure to industry sectors. Ridgeview may establish an Investment Committee in its sole discretion.

Clients receive account statements on a monthly basis from the broker and custodian of the assets managed by Ridgeview, unless there is no activity in an account then the Client will receive those account statements no less than quarterly. Additionally, Ridgeview provides a quarterly investment commentary and report summarizing performance results for each Client.

Notwithstanding anything in this Section 13, Ridgeview believes that its investment program does not require daily or short-term transactions on a regular basis. Moreover, that its long-term time horizon is more beneficial to Clients compared to regularly and actively trading a Client portfolio.

Item 14 - Client Referrals and Other Compensation

Client Referrals

Ridgeview may enter into referral agreements with certain individuals where it pays a portion of its advisory fees related to Clients referred to Ridgeview. Ridgeview will pay referral fees related to client introductions at no additional cost to the Client.

Other Compensation

Ridgeview does not receive other compensation other than the Management Fee related to its advisory services provided to Clients.

Item 15 – Custody

Client assets are held in a brokerage account with Fidelity Investments, Northern Trust, or another independent qualified custodian. The qualified custodian is responsible for safe-keeping of cash and securities of each Client. In general, securities and cash are insured by the custodian only up to \$500,000 in total value and up to \$250,000 in cash. This level of insurance is generally typical in the financial markets.

In its Investment Management Agreement with Ridgeview, each Client authorizes Ridgeview to have access over each Client account. The authorization generally provides Ridgeview trading access and the ability to debit its advisory fees from Client accounts.

The custodian prepares a statement no less than quarterly for each Client account. Statements are made available by the custodian to Clients by US Mail or secure internet access. Clients should carefully review these statements, and should compare these statements to any account information provided by Ridgeview and notify Ridgeview of any discrepancies.

Item 16 – Investment Discretion

Ridgeview, in its Investment Management Agreement with each Client, accepts discretionary authority to manage securities accounts on behalf of its Clients. Prior to assuming discretionary authority, the client must grant Ridgeview Power of Attorney [or designate Ridgeview as a Client Representative]. When signing the Investment Management Agreement, the Client specifically accepts and appoints Ridgeview as their representative. Pursuant to the terms of the Investment Management Agreement, Ridgeview has the discretionary authority to make the following determinations without obtaining the consent of the Client before the transactions are effected:

- The securities that are to be bought and sold;
- The total amount of the securities to be bought or sold;
- The brokers through which securities are to be bought or sold; and
- The commission rates at which securities transactions for client accounts are affected.

Ridgeview's authority to invest Client assets are subject to conditions imposed by each Client.

Item 17 – Voting Client Securities

Ridgeview delegates voting of proxies when possible to one or more Provider or qualified proxy service on behalf of its Clients when the Provider has implemented proxy voting policies and procedures consistent with Ridgeview, which in general include but are not limited to the following considerations:

- Proxies requiring in depth review and consideration, such as those involving shareholder rights, corporate governance, corporate reorganization, and social concerns;
- Proxies are voted on an individual basis;
- Proxies determined to be economically immaterial or insignificant are typically voted in accordance with management's recommendations;
- Consideration shall be given to clients who are directors or controlling investors in a public company; and
- Clients with specific preferences for example, related to environmental or other matters personal to the Client, may be voted in accordance with the Client's preferences.

Ridgeview provides a copy of Ridgeview's Proxy Voting Policies and Procedures to Clients upon request at no charge. Clients may also request a record of proxies as voted by a Provider or qualified service on behalf of Ridgeview Clients. Clients may request proxy information from Ridgeview by calling Michael Robinson at 914-925-3411 or by sending an email to robinson@ridgeviewasset.com.

Item 18 – Financial Information

Prepayment of Fees

Ridgeview does not require prepayment of more than \$500 in fees per client, six months of more in advance.

Material Financial Conditions

At this time, there are no known or anticipated material events that may impair Ridgeview's ability to meet contractual commitments to its Clients.

Bankruptcy

Ridgeview has not been the subject of a bankruptcy petition at any time.

Part 2B

Ridgeview Asset Management Partners, LLC Form ADV Part 2B – Brochure Supplement Effective: March 2018

This Form ADV Part 2B (“Brochure Supplement”) provides information about the background and qualifications of certain employees of Ridgeview in addition to the information contained in Form ADV Part 1 (“Brochure”) for Ridgeview Asset Management Partners, LLC (“Ridgeview”). If you have not received a copy of this Brochure or if you have any questions about the contents of this Brochure Supplement or Ridgeview’s Brochure, please contact us by email at robinson@ridgeviewasset.com. Additional information about our employees is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

**Ridgeview Asset Management Partners, LLC
411 Theodore Fremd, Suite 206 South, Rye, NY 10580
Phone: 914-925-3411
www.ridgeviewasset.com**

Form ADV Part 2B – Brochure Supplement

Michael W. Robinson

Michael W. Robinson is the Founder & Managing Member of Ridgeview Asset Management Partners, LLC. Mr. Robinson was born in 1972. He earned a B.A. in Economics and a minor in Mathematics from Trinity College in 1994 where he was elected to Phi Beta Kappa. His employment history has spanned across several asset management disciplines including work in the mutual fund, hedge fund, private equity and investment banking industries. He began his investment career at J.P. Morgan & Company in 1994 where he was an investment banker and rose to become a Vice-President in J.P. Morgan's private equity group, J.P. Morgan Capital. Subsequently in 2001, he was a General Partner of Telegraph Hill Communications Partners, a communications and media-focused private equity firm that he co-founded and a Senior Equity Analyst at TriSun Asset Management, a long/short hedge fund. Mr. Robinson has served as a director or observer on eight Boards of Directors and helped found six companies. Most recently, Mr. Robinson was a Vice President at General American Investors Inc.

Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Robinson. Mr. Robinson has never been involved in a regulatory, civil or criminal action. There have been no Client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Robinson.

Other Business Activities

Mr. Robinson is not involved in other investment-related business activities outside of Ridgeview. Mr. Robinson is a Director to a small private company.

Additional Compensation

Mr. Robinson receives no additional compensation outside of Ridgeview.

Supervision

Mr. Robinson is a Co-Founder & Managing Member of Ridgeview and also serves as its Chief Compliance Officer. Ridgeview has implemented policies and procedures to minimize conflicts of interest; however, supervision over Mr. Robinson is limited.

Form ADV Part 2B – Brochure Supplement

John W. Watkins

John W. Watkins is the Co-Founder & Executive Chairman of Ridgeview Asset Management Partners, LLC. John brings 28 years of investing experience to Ridgeview. Prior to founding Ridgeview, John served as Managing General Partner at MC Partners, a private equity firm focused on communications investments. While John has been at MC, the firm has achieved top quartile returns. Beginning in January of 2018, John transitioned to the role of Senior Adviser to MC Partners while also serving as Executive Chairman of Ridgeview. Ridgeview believes that any possible conflicts related to such a dual-affiliation are minimal due to the different industries in which the firms conduct business, and are reduced even further by the policies and procedures in place at both firms.

Prior to MC Partners, John founded Telegraph Hill Communications Partners. John started his private equity career at JP Morgan where he achieved the position of Managing Director and ultimately ran the firm's worldwide private equity investing activity in telecommunications, media and technology. Representative investments include Qualcomm, FrontierVision, Triton PCS and Triton Cellular, Accent Health and Legendary Pictures. John has served on over 20 boards of directors. John has a Bachelor of Arts in Economics from Northwestern University and a Master of Business Administration from the Amos Tuck School of Business, Dartmouth College.

Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Watkins. Mr. Watkins has never been involved in a regulatory, civil or criminal action. There have been no Client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Watkins.

Other Business Activities

As discussed above, beginning in January of 2018, Mr. Watkins transitioned to the role of Senior Adviser to MC Partners while also serving as Executive Chairman of Ridgeview. Ridgeview believes that any possible conflicts related to such a dual-affiliation are minimal due to the different industries in which the firms conduct business, and are reduced even further by the policies and procedures in place at both firms. Mr. Robinson is not involved in other investment-related business activities outside of Ridgeview. Mr. Robinson is a Director to a small private company.

Additional Compensation

Mr. Watkins receives compensation from both MC Partners and Ridgeview.

Supervision

Mr. Watkins is supervised by Michael Robinson, Co-Founder & Managing Member of Ridgeview who also serves as its Chief Compliance Officer.