

# Reedmark Advisors, LLC

## Firm Brochure - Form ADV Part 2A

*This brochure provides information about the qualifications and business practices of Reedmark Advisors, LLC. If you have any questions about the contents of this brochure, please contact us at (908) 300-5292 or by email at: [apascazio@reedmark.com](mailto:apascazio@reedmark.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 Reedmark Advisors, LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Reedmark Advisors, LLC's CRD number is: 173760.*

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*Registration does not imply a certain level of skill or training.*

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## **Item 2: Material Changes**

The material changes in this brochure from the last annual updating amendment of Reedmark Advisors, LLC on January 18, 2019 are described below. Material changes relate to Reedmark Advisors, LLC's policies, practices or conflicts of interests.

- Reedmark Advisors, LLC has updated the description of their Advisory Services

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## **Item 4: Advisory Business**

### **A. Description of the Advisory Firm**

Reedmark Advisors, LLC (hereinafter “Reedmark”) is a Limited Liability Company organized in the State of Delaware.

The firm was formed in October 2014 and the principal owner is Anthony Joseph Pascazio.

### **B. Types of Advisory & Consulting Services**

#### ***Pension and Retirement Plan Consulting Services***

Reedmark offers Fiduciary and Non-Fiduciary retirement plan consulting services to ERISA and Non-ERISA retirement plans. The type of plans that Reedmark specifically provides services too are as follows:

- 401(k)
- 403(b)
- 457(b)
- 401(a)
- 457(f)
- 409(A) Deferred Compensation Plans
- Defined Benefit Plans –Traditional and Cash Balance
- Actuarial Services

#### ***Specific Services:***

##### Fiduciary:

1. Creating and updating Committee Charters for the retirement plan and or investment committee of the retirement plans.
2. Assist in the development, amending and maintenance of the Investment Policy Statement (IPS)
3. Assist the investment committee in creating an investment menu/options for self-directed retirement plans.
4. Provide non-discretionary investment advice to the retirement plan committee about asset classes and investment alternatives available for the plan in accordance with the plan’s IPS and objectives.
5. Assist the investment committee with the selection of a broad range of investment options consistent with ERISA 404(c). *(When client has elected to be a 404(c) plan).*
6. Provide non-discretionary investment advice to the committee with respect to the selection of a qualified default investment alternative (QDIA) for participants who are automatically enrolled in the plan or who otherwise fail to make an

investment election.

7. Review, maintain and negotiate on plan sponsors behalf all service agreements currently in place with record-keepers, investment providers, Third Party Administrators and plan custodians to improve the pricing and expenses being charged to the plan and the plan's participants.
8. Perform or provide a total plan expense analysis annually.
9. Attend all retirement plan committee meetings either in-person or tele-phonically
10. Provide the investment committee quarterly reports highlighting the investment performance of each fund offered plan participants.

#### Non-fiduciary Services

1. Consult and guide the Retirement Plan Committee on the development and maintenance of a Committee Charter
2. Review and maintain a record of all plan documents and amendments
3. Provide assistance with any governmental agency correction program submission
4. Maintain a record of current and prior Summary Plan Descriptions
5. Recommend plan design changes and alternatives when appropriate
6. Periodically monitor on-going plan administrative functions.
7. Assist educating the investment committee, Retirement Plan Administrative Committee and Board of Directors/Trustees on the components of the retirement plans and their responsibilities as it relates to the Plans.
8. Assist with the development of all participant education programs
9. Perform a search for new service providers such as record-keepers and third party administrators when required.

#### ***Retirement Plan Assessment Services***

Reedmark offers retirement plan assessment services. These services include a total review of the overall plan including compliance, actuarial, fiduciary advisory, investment advisory and industry benchmarking. Clients are billed an hourly rate based upon the level of professional who contributes to the overall project. Client signs an engagement letter before any work is begun. Hourly rates range from \$250.00 per hour to \$500.00 per hour.

***Individual Investor Services (Individual Investor Services are a secondary business of Reedmark Advisors. Reedmark's primary business is providing services directly to retirement plans).***

Reedmark will assist individual clients with portfolio advisory services based on the individual goals, objectives, time horizon, and risk tolerance of each client. Reedmark will create an Investment Policy Statement for each client which outlines the client's current situation including income, tax, and risk tolerance levels and then construct a plan to aid selecting a portfolio matching each client's specific situation. Portfolio advisory services include, but are not limited to, the following:

- Investment strategy
- Asset allocation
- Risk tolerance
- Personal investment policy
- Asset/fund selection
- Regular portfolio monitoring

Reedmark evaluates the current investments of each client with respect to risk tolerance and time horizon. Reedmark may request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented in the Investment Policy Statement. Each client must approve the Investment Policy Statement by execution of a copy of said statement.

Reedmark seeks to provide investment decisions that made in accordance with the fiduciary duty owed to its clients without consideration of Reedmark's economic, investment or other financial interests. To meet its fiduciary obligations, Reedmark attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, Reedmark's policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client over another over time. It is Reedmark's policy to allocate appropriate and prudent investment opportunities and transactions among its clients on a fair and equitable basis over time.

### ***Selection of Other Advisers***

Reedmark may direct clients to third-party investment advisers to manage all or a portion of the client's assets. Before selecting other advisers for clients, Reedmark will always ensure those other advisers are properly licensed or registered as an investment adviser. Reedmark then makes investments with a third-party investment adviser by referring the client to the third-party adviser. These investments may be allocated either through the third-party adviser's fund or through a separately managed account managed by such third party adviser on behalf of Reedmark's client. Reedmark may also allocate among one or more private equity funds or private equity fund advisers. Reedmark will not review the ongoing performance of the third-party adviser as a portion of the client's portfolio.

## **C. Client Tailored Services and Client Imposed Restrictions**

Reedmark will tailor a program for each individual client. This will include an interview session to get to know the client's specific needs and requirements as well as a plan that will be executed by Reedmark on behalf of the client. Reedmark may use "model portfolios" together with a specific set of recommendations for each client based on their personal restrictions, needs, and targets. Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs.

## **D. Wrap Fee Programs**

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and other administrative fees. Reedmark does not participate in any wrap fee programs.

## **E. Assets Under Advisement**

Reedmark has the following assets under advisement:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$0.00	\$1,101,090,844.00	December 31, 2019

# **Item 5: Fees and Compensation**

## **A. Fee Schedule**

### ***Asset-Based Fees for Portfolio Management***

Total Assets Under Management	Annual Fee
\$0 - \$3,000,000	1.00%
\$3,000,001 - \$5,000,000	0.75%
\$5,000,001 - \$10,000,000	0.50%
\$10,000,001 - \$15,000,000	0.40%
\$15,000,001 - \$25,000,000	0.30%
\$25,000,000 - And Up	0.25%

These fees are generally negotiable and the final fee schedule is attached as Exhibit II of the Investment Advisory Contract. Clients may terminate the agreement without penalty for a full refund of Reedmark's fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract generally with 90 days' written notice.



Reedmark uses the value of a client's account on the last day of each quarter, the billing period, for purposes of determining the market value of the assets upon which the advisory fee is based.

### ***Selection of Other Advisers Fees***

Reedmark will receive its standard fee in addition to any fee paid a third party adviser. This relationship will be memorialized in each contract between Reedmark and each third-party adviser. The fees will not exceed any limit imposed by any regulatory agency. The notice of termination requirement and payment of fees for third-party investment advisers will depend on the specific third-party adviser selected.

These fees are negotiable.

Reedmark may engage in the selection of third-party money managers, but does not have any such arrangements in place at this time. This service may be canceled with 30 days' notice.

### ***Pension Consulting Services Fees***

#### ***Asset-Based Fees for Pension Consulting***

<b>Total Assets Under Management</b>	<b>Annual Fee</b>
\$0 - \$15,000,000	0.50%
\$15,000,001 - \$30,000,000	0.30%
\$30,000,001 - \$50,000,000	0.25%
\$50,000,001 - And Up	0.15%

These fees are generally negotiable and the final fee schedule is attached as Exhibit II of the Pension Consulting and Investment Advisory Agreement.

Clients may terminate the agreement without penalty for a full refund of Reedmark's fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract generally with 90 days' written notice. Reedmark bases its consulting fee on the value of plan assets as of the final day of a Plan Quarter. Specifically, March 30, June 30, September 30 and December 31<sup>st</sup>.

## **B. Payment of Fees**

### ***Payment of Asset-Based Portfolio Management Fees***

Asset-based portfolio management fees are withdrawn directly from the client's accounts with client's written authorization on a quarterly basis. Fees are paid in arrears.

### ***Payment of Asset-Based Pension Consulting Fees***

Asset-based pension consulting fees are withdrawn directly from the Plan with client's written authorization on a quarterly basis. Fees are paid in arrears.

### ***Payment of Selection of Other Advisers Fees***

The timing, frequency, and method of paying fees for selection of third-party managers will depend on the specific third-party adviser selected.

### ***Retirement Plan Assessment Services***

Clients are billed an hourly rate based upon the experience level of the professional who contributes to the overall project. Client signs an engagement letter before any work is begun. Hourly rates range from \$250.00 per hour to \$500.00 per hour. Fees are generally paid in arrears. Based upon the specific assignment, Reedmark may request an initial retainer before any work begins.

## **C. Client Responsibility for Third Party Fees**

Clients are responsible for the payment of all third party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by Reedmark. Please see Item 12 of this brochure regarding broker-dealer/custodian.

## **D. Prepayment of Fees**

Reedmark's practice is to collect fees in arrears. It generally does not collect fees in advance. Certain non-fiduciary assignments may require a retainer before work is begun.

## **E. Outside Compensation for the Sale of Securities to Clients**

Neither Reedmark nor its supervised persons accept any compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

## **Item 6: Performance-Based Fees and Side-By-Side Management**

Reedmark does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

## **Item 7: Types of Clients**

Reedmark generally provides consulting and advisory services to the following types of clients:

- ❖ Pension and Profit Sharing Plans sponsored by large non-profit organizations and mid-sized for-profit employers
- ❖ High-Net-Worth Individuals

### ***Minimum Account Size for Portfolio Management***

There is an account minimum of \$500,000, which may be waived by Reedmark in its discretion.

### ***Minimum Account Size for Pension Consulting***

There is an account minimum of \$5,000,000, which may be waived by Reedmark in its discretion.

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

### **A. Methods of Analysis and Investment Strategies**

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

**Charting analysis** strategy involves using and comparing various charts to predict long and short-term performance or market trends. The risk involved in using this method is that only past performance data is considered without using other methods to crosscheck data. Using charting analysis without other methods of analysis would be making the assumption past performance will be indicative of future performance. This may not be the case.

**Fundamental analysis** concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is the market will fail to reach expectations of perceived value.

**Quantitative Model Risk:** Investment strategies using quantitative models may perform differently than expected as a result of, among other things, the factors used in the models, the weight placed on each factor, changes from the factors' historical trends, and technical

issues in the construction and implementation of the models.

### ***Investment Strategies***

**Long term investment strategies** are designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

**Selection of Other Advisers:** Reedmark's selection process cannot ensure money managers will perform as desired and Reedmark will have no control over the day-to-day operations of any of its selected money managers. Reedmark would not necessarily be aware when certain activities occur at the underlying money manager level, including without limitation a money manager's engaging in unreported risks, investment "style drift" or even regulator breach or fraud.

**Investing in securities involves a risk of loss that you, as a client, or Plan Sponsor should be prepared to bear.**

### **B. Risks of Specific Securities Utilized**

Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below are not guaranteed or insured by the FDIC or any other government agency.

**Mutual Funds:** Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond "fixed income" nature (lower risk) or stock "equity" nature.

**Equity** investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environment.

**Fixed income** investments generally pay a return on a fixed schedule, though the payment amount can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit

rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

**Exchange Traded Funds (ETFs):** An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding's bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance.

**Hedge Funds** often engage in leveraging and other speculative investment practices which may increase investment loss risk; can be highly illiquid; are not required to provide periodic pricing or valuation information to investors; may involve complex tax structures and delays in distributing important tax information; are not subject to the same regulatory requirements as mutual funds; and often charge high fees. In addition, hedge funds may invest in risky securities and engage in risky strategies.

**Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

## **Item 9: Disciplinary Information**

### **A. Criminal or Civil Actions**

There are no criminal or civil actions to report.

### **B. Administrative Proceedings**

There are no administrative proceedings to report.

### **C. Self-regulatory Organization (SRO) Proceedings**

There are no self-regulatory organization proceedings to report.

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

### **A. Registration as a Broker/Dealer or Broker/Dealer Representative**

Neither Reedmark nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

### **B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor**

Neither Reedmark nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

### **C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests**

Anthony Joseph Pascazio is an independent licensed insurance agent and from time to time, will offer clients advice or products from those activities. Clients should be aware that these services pay a commission or other compensation and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. Reedmark always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients are in no way required to utilize the services of any representative of Reedmark in connection with such individual's activities outside of Reedmark.

### **D. Selection of Other Advisers or Managers and How the Adviser is Compensated for Those Selections**

Reedmark may direct clients to third-party investment advisers or managers to manage all or a portion of the client's assets. Clients will pay Reedmark its standard fee in addition to the standard fee for the advisers to which it directs those clients. This relationship will be memorialized in each contract between Reedmark and each third-party advisor. The fees will not exceed any limit imposed by any regulatory agency. Reedmark will always act in the best interests of the client, including when determining which third-party investment adviser to recommend. Reedmark will ensure all recommended advisers are licensed or notice filed in the states in which Reedmark is recommending them.

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

### **A. Code of Ethics**

Reedmark has a written Code of Ethics covering the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. Reedmark's Code of Ethics is available free upon request to any current or prospective client.

### **B. Recommendations Involving Material Financial Interests**

Reedmark does not recommend clients buy or sell any security in which a related person to Reedmark has a material financial interest.

### **C. Investing Personal Money in the Same Securities as Clients**

From time to time, Reedmark representatives may buy or sell securities or mutual funds for themselves that they also recommend to clients. This may provide an opportunity for Reedmark representatives to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide clients. Such transactions may create a conflict of interest. Reedmark will always document any transactions which could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

## **Item 12: Brokerage Practices**

### **A. Factors Used to Select Custodians and/or Broker/Dealers**

Custodians/broker-dealers will be recommended based on Reedmark's duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients will not necessarily pay the lowest commission or commission equivalent, and Reedmark may also consider the market expertise and research access provided by the broker-dealer/custodian, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers that may aid in Reedmark's research efforts. Reedmark will never charge a premium or commission on transactions, beyond the actual cost imposed by the

broker-dealer/custodian.

Reedmark will recommend clients to use Schwab Institutional, a division of Charles Schwab & Co., Inc. or TD Ameritrade Institutional as a custodian.

### ***1. Research and Other Soft-Dollar Benefits***

While Reedmark has no formal soft dollars program in which soft dollars are used to pay for third party services, Reedmark may receive research, products, or other services from custodians and broker-dealers in connection with client securities transactions ("soft dollar benefits"). Reedmark may enter into soft-dollar arrangements consistent with (and not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended. There can be no assurance any particular client will benefit from soft dollar research, whether or not the client's transactions paid for it, and Reedmark does not seek to allocate benefits to client accounts proportionate to any soft dollar credits generated by the accounts. Reedmark benefits by not having to produce or pay for the research, products or services, and Reedmark will have an incentive to recommend a broker-dealer based on receiving research or services. Clients should be aware that Reedmark's acceptance of soft dollar benefits may result in higher commissions charged to the client.

### ***2. Brokerage for Client Referrals***

Reedmark receives no referrals from a broker-dealer, Custodian or third party in exchange for using that broker-dealer, Custodian or third party.

### ***3. Clients Directing Which Broker/Dealer/Custodian to Use***

Reedmark may permit clients to direct it to execute transactions through a specified broker-dealer. Clients must reference their advisory agreements for a complete understanding of how they may be permitted to direct brokerage. If a client directs brokerage, the client will be required to acknowledge in writing the Client's direction with respect to the use of brokers supersedes any authority granted Reedmark to select brokers; this direction may result in higher commissions, which may result in a disparity between free and directed accounts and trades for the client and other directed accounts may be executed after trades for free accounts, which may result in less favorable prices, particularly for illiquid securities or during volatile market conditions. Not all investment advisers allow their clients to direct brokerage.

## **B. Aggregating (Block) Trading for Multiple Client Accounts**

Reedmark does not aggregate or bunch the securities purchased or sold for multiple clients. This may result in less favorable prices, particularly for illiquid securities or during volatile market conditions.



## **Item 13: Reviews of Accounts**

### **A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews**

All client accounts for Reedmark's advisory services are reviewed at least quarterly by Anthony J Pascasio, Managing Member with regard to clients' respective investment policies and risk tolerance levels. All accounts at Reedmark are assigned to this reviewer.

### **B. Factors That Will Trigger a Non-Periodic Review of Client Accounts**

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations such as retirement, termination of employment, physical move, or inheritance.

### **C. Content and Frequency of Regular Reports Provided to Clients**

Each Reedmark advisory services client will receive a quarterly report detailing the client's account, including assets held, asset value, and fee calculations. This written report will come from the custodian. Reedmark will also provide at least quarterly a separate written report to the client.

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

### **A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)**

Reedmark does not receive any economic benefit, directly or indirectly from any third party for advice rendered to Reedmark's clients.

### **B. Compensation to Non – Advisory Personnel for Client Referrals**

Reedmark does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

## **Item 15: Custody**

When advisory fees are deducted directly from client accounts at client's custodian, Reedmark will be deemed to have limited custody of client's assets and must have written authorization from the client to do so. Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy.

## **Item 16: Investment Discretion**

Reedmark provides discretionary and non-discretionary investment advisory services to clients. The Investment Advisory Contract established with each client sets forth the discretionary authority for trading. Where investment discretion has been granted, Reedmark generally manages the client's account and makes investment decisions without consultation with the client as to when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, what securities to buy or sell, or the price per share. In some instances, Reedmark's discretionary authority in making these determinations may be limited by conditions imposed by a client (in investment guidelines or objectives, or client instructions) otherwise provided to Reedmark. An example of investment discretion is when a client or retirement committee has established guidelines within an Investment Policy Statement as to when a portfolio is to be rebalanced. Rebalancing may dictate a portfolio not exceed a certain percentage in a specific asset class. A client may give Reedmark discretion to rebalance the portfolio within the Investment Policy Statement's guidelines without prior client approval.

## **Item 17: Voting Client Securities (Proxy Voting)**

Reedmark will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

## **Item 18: Financial Information**

### **A. Balance Sheet**

Reedmark neither requires nor solicits prepayment of more than \$1,200 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

### **B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients**

Neither Reedmark nor its management has any financial condition that is likely to reasonably impair Reedmark's ability to meet contractual client commitments .

### **C. Bankruptcy Petitions in Previous Ten Years**

Reedmark has not been the subject of a bankruptcy petition in the last ten years.