

RMDR Advisors, Inc.
FORM ADV PART 2A (Firm Brochure)

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**This Brochure provides information about the qualifications and business practices of RMDR Advisors, Inc. If you have any questions about the contents of this Brochure, please contact us at 713-661-3183 or rgeary@rmdradvisors.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.
RMDR Advisors, Inc. is a registered investment advisor.**

**Registration of an Investment Advisor does not imply any level of skill or training. The oral and written communications of an Advisor provide you with information about which you determine whether to hire or retain an Advisor.
Additional information about RMDR Advisors, Inc. also is available on the SEC's website at www.adviserinfo.sec.gov.**

Summary of Material Changes

Annual Update

RMDR Advisors, Inc.'s last annual amendment was on March 14, 2019.

Material Changes since the Last Annual Update

None

Firm Brochure Available

If you would like to receive a copy of our Firm Brochure, or a supplemental brochure about any advisor, please contact us by telephone at 800-369-5355 or by email at:

rgeary@rmdradvisors.com.

Item 3 -Table of Contents

Item 1 – Cover Page	Cover
Item 2 – Material Changes.....	i
Item 3 – Table of Contents	ii
Item 4 – Advisory Business	1
Item 5 – Fees and Compensation	4
Item 6 – Performance-Based Fees and Side-By-Side Management	7
Item 7 – Types of Clients.....	7
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss.....	7
Item 9 – Disciplinary Information	8
Item 10 – Other Financial Industry Activities and Affiliations	8
Item 11 – Code of Ethics	9
Item 12 – Brokerage Practices	10
Item 13 – Review of Accounts	12
Item 14 – Client Referrals and Other Compensation	12
Item 15 – Custody	12
Item 16 – Investment Discretion	12
Item 17 – Voting Client Securities.....	13
Item 18 – Financial Information.....	13

Item 4 – Advisory Business

RMDR Advisors, Inc. (“RMDR” or “the firm”) provides financial planning and investment management services to individuals, retirement plan participants, corporations and charitable organizations. Robert J. Geary began the firm in 1985 as Geary Investment Advisory Services, Inc., and he is the president of the firm.

Mr. Geary has been the sole owner of the firm since its inception and remains the sole owner and officer, along with his wife who does not participate in the business. In 2008, Mr. Geary asked two Certified Financial Planners™, Deborah J. Fritsche and J. Randall Reimer, to assist him in the firm. Ms. Fritsche and Mr. Reimer do not have any ownership interest in the firm. The firm’s name was changed to RMDR Advisors, Inc.

In March 2012, Steven A. Zabriskie became registered as an investment advisor representative (IAR) of RMDR Advisors, Inc. Previously, Mr. Zabriskie operated his own practice as an SEC-registered investment advisor in San Antonio, Texas. Mr. Zabriskie focuses on managing accounts for participants in the University of Texas’s ORP and 403(b) programs. Fidelity Investments is the custodian of these accounts. With his clients’ consent, the accounts were moved to RMDR.

Types of Advisory Services: The firm offers comprehensive financial planning services as well as investment advice. Mr. Geary, in addition to being a registered investment advisor, is a licensed insurance agent. Mr. Reimer, in addition to being a CFP®, is a Certified Public Accountant. Ms. Fritsche, in addition to being a CFP®, is a licensed attorney at law in Texas. Engagement of the firm can be limited to just a specific financial concern, such as the following:

- Investment portfolio analysis, construction, and/or management;
- investing for a specific need, such as college funding, purchasing a new home, or car;
- retirement planning, or retirement distribution analysis and/or management;
- cash flow management and budgeting;
- identifying tax planning issues;
- identifying estate planning issues;
- risk management and insurance needs;
- long-term care.

For implementing investment advice, clients may act on RMDR’s recommendations by placing securities transactions with any brokerage firm the client chooses. The client is under no obligation to act on RMDR’s recommendations. If the client does decide to implement the investment advice through RMDR, the client will enter into an ongoing asset management agreement under which RMDR’s fee is either fixed or based on a percentage of assets under management.

For the implementation of legal and/or accounting recommendations, such as for estate planning, and for tax planning, the firm will, at the client's request, recommend other professionals for these services. Ms. Fritsche is an attorney, but will not provide legal services, such as drafting estate planning document for the client, as a service provided by the firm. Ms. Fritsche can provide legal services with law firms through which she practices law, if the client wants, or Ms. Fritsche can provide a referral to another lawyer. The client selects the option. Mr. Reimer is an accountant. He is a principal in his own accounting firm, Reimer, McGuinness and Associates, P.C. ("Reimer McGuinness"). RMDR may refer clients to Reimer McGuinness for implementation of tax planning issues. Reimer could have a conflict of interest in receiving referrals from RMDR. RMDR and Reimer will immediately inform the client if they become aware of any potential conflicts of interest.

The firm provides investment supervisory services accounting for approximately 90% of total advisory billings and manages investment accounts (not involving supervisory services) for approximately 10% of total advisory billings.

The firm does not limit itself to certain types of investments.

Management of 403(b) assets under University of Texas System's optional retirement program: Mr. Geary and Mr. Zabriskie have developed considerable expertise in management of 403(b) assets for participants in the Optional Retirement Program established for employees of the public upper education system in the State of Texas (principally physicians associated with medical schools of the system). These clients have engaged RMDR to manage the client's investment portfolio. Mr. Geary has over 32 years' experience with the requirements of this particular program, and Mr. Zabriskie has 13 years' experience.

As of December 31, 2019, RMDR Advisors, Inc. managed \$89,672,583 of 403(b) assets, providing asset management services for tax deferred accounts through Fidelity Investments and TIAA-CREF which are vendors currently approved by the University of Texas System.

Tailoring our services to the client: Our services can be as much or as little as the client requests. We can provide a comprehensive financial plan with implementation, including asset management by the firm, to a recommendation on a very limited topic. Our advice is based on the client's financial situation at the time the advice is presented and is based on what could be a substantial amount of financial information. The client will need to provide this information to RMDR, depending on the advice sought. We inform our clients that certain assumptions may be made with respect to inflation and interest rates as well as past trends and performance of the market and economy. RMDR does not guarantee the success of any financial plan and does not guarantee that the client's financial goals and objectives will be met.

Investment Management Services: Some clients, including financial planning clients, engage RMDR to manage their assets. All of RMDR's investment management services are provided on a discretionary basis, which means that the client grants RMDR complete discretion to manage the account, subject to the client's investment objectives and any restrictions the client may wish to impose, such as instructing RMDR not to purchase certain types of securities. Under discretionary agreements, unless the client has provided written instructions delineating specific restrictions to the firm when the client engages the firm, RMDR determines the securities to be purchased or sold, and the amount of securities to be purchased or sold. In most cases, these transactions are done with no-load funds, and client accounts incur no transaction costs or very limited transaction costs. Once the portfolio is constructed, RMDR provides periodic supervision and re-optimization of the portfolio as changes in market conditions and the client's circumstances may require.

Wrap fee programs are not applicable.

As of 12/31/2019, our assets under management were \$174,179,572, all of which were managed on a discretionary basis. We do not have any non-discretionary accounts.

	U.S. Dollar Amount	Total Number of Accounts	Total Number of Clients
Discretionary:	\$174,179,572	714	285
Non-Discretionary:	\$ 0.00	0	0
Total:	\$174,179,572	714	285

Outside Financial Planning Services: RMDR may refer certain clients to Legacy Asset Management, Inc. for financial planning services.

Newsletter: RMDR Advisors, Inc. provides, at no additional cost to the client, a periodic newsletter titled "Opinions." This newsletter is delivered by e-mail. Mr. Geary writes this newsletter to inform clients of his current opinions on the stock and bond markets. This newsletter is intended to provide current information to clients and to inform them of changes concerning the markets. The newsletter is distributed approximately every six weeks. Mr. Zabriskie also separately provides his clients with a newsletter updating them on their investments.

Location of Additional Offices: The Park City, Utah office is located at 7450 Ridge Drive, Park City, UT 84060. The mailing address is PO Box 2092, Park City, UT 84060-2092. This office focuses on retail account management and financial planning.

The Waco office is located at 3509 Austin Ave., Waco, TX 75710. This office focuses on managing accounts for participants in ORP and 403(b) programs.

The San Antonio office is located at 9218 Serene Creek Drive, San Antonio, TX 78230-4038. This office focuses on managing accounts for participants in ORP and 403(b) programs at U. Texas San Antonio and U. Texas Health Science Center San Antonio.

Item 5 – Fees and Compensation

All fees are subject to negotiation.

At the outset of a financial planning engagement, RMDR and the client will agree on the scope of services and whether fees will be charged on a fixed fee or hourly basis. The fee depends on the facts and circumstances of the client's financial situation and the complexity of the services RMDR provides. Before beginning its work, RMDR will estimate its fees, but the complexity of the services provided may mean that RMDR incurs more time than originally estimated. In these cases, RMDR will notify the client and request the client's approval before additional fees are incurred. The firm offers financial planning and consulting services for fixed fees or at hourly rates, depending on the client's needs and wishes. The following fee schedule applies to RMDR's financial planning services.

For clients referred to Legacy Asset Management, Inc., Mr. Geary will share in commissions on any insurance products sold to the mutual client.

Fixed Fees: Fixed fees for financial planning and consulting generally range between \$500 and \$5000, depending upon the services requested; that is, a discrete, single-issue project or a comprehensive, multi-issue financial plan. Before any services are provided, RMDR may require that the client pay an initial retainer fee equal to one-half of RMDR's estimated fee. The remaining balance will be due on RMDR's completion of the contracted services. All services will be performed within six months of RMDR's receipt of a retainer fee.

Hourly Fees: RMDR also charges hourly fees for financial planning and consulting services. The firm's hourly rate is set on January 1st of each calendar year. The hourly rate is \$325. Before any services are provided, RMDR may require that the client pay an initial retainer fee equal to one-half of RMDR's estimated fee. The remaining balance will be due on RMDR's completion of the contracted services. All services will be performed within six months of RMDR's receipt of a retainer fee.

Management Fees: For investment management accounts, RMDR's annual fees are based on a percentage of assets in the client's account. Clients whose investment advisory agreements with Mr. Zabriskie were assigned to RMDR will continue to be charged fees quarterly in advance as provided in their agreements.

Other RMDR clients' fees are charged quarterly in arrears. Fees are based on the total market value of the account, including cash, as of the last trading day of the preceding

calendar quarter. RMDR's typical annual fee for investment management accounts is based upon the following schedule:

1.5 % on assets up to \$250,000;
1.0% on the next \$250,000 and above;
Fees are negotiable for all accounts.

Accounts containing only fixed income assets are billed at a flat annual rate of no more than 1.00%.

Under certain circumstances, RMDR may negotiate fees for any of its services, and therefore fees may vary from client to client. Fees may be adjusted upon thirty days' written notice to the client.

RMDR's fees for the clients who participate in the aforementioned university retirement system (Item 4B) are generally lower than fees for RMDR's other clients, due to some or all of the following factors: the volume of participants, the regulation of and standards set for participation in the university's retirement program, and the tax deferred nature of the accounts.

For financial planning clients who engage RMDR to manage assets, the firm may agree to waive the financial planning fee for accounts with over \$1,000,000 under RMDR's management.

RMDR may reduce or waive its fees for accounts of RMDR's associated persons and their families.

Accounting and collection of our fee: Most clients do not pay asset management fees in advance. However, clients whose investment advisory agreements with Mr. Zabriskie were assigned to RMDR will continue to be charged fees quarterly in advance as provided in their agreements.

Fees are deducted from each client's account(s) as agreed upon, after the end of each quarter. Fees are based on the client's account balance(s) at the close of business on the last day of each quarter. Clients are not invoiced but receive notification of deducted advisor fees on the next account statement provided by the account custodian.

If a client authorizes the deduction of fees from the account maintained with the client's Custodian, the Custodian will not verify RMDR's fee calculation and therefore it is the client's responsibility to review the account custodian statements to ensure that fees were calculated accurately. Clients may issue written instructions directing RMDR to deduct fees from one of the client's RMDR accounts to pay the fees of another of the client's RMDR accounts. Clients may also pay RMDR's fees directly.

Termination of Agreements: Investment management clients are required to sign an investment advisory agreement with RMDR. The agreement provides that it shall be continuous until one party to the agreement terminates it. Each agreement provides that the client may terminate the agreement within five business days of its effective date without paying any fees or penalties to RMDR. The agreement also provides that once the initial five-day period has passed, either party to the agreement may terminate the agreement at any time by providing written notice to the other party, however, the client will incur a pro rata charge for services rendered prior to termination. If the agreement is terminated partway through a calendar quarter, RMDR will deduct fees from the client's custodial account for the period beginning with the first day of the current calendar quarter through the date of termination. If there are any prepaid unearned fees at the time of termination, the firm will promptly refund those fees to the client.

Other fees: RMDR's fees do not include any bank fees, margin interest, national securities exchange fees, wire transfer fees or other costs or fees associated with securities transactions or required by law. Clients' funds awaiting investment may be placed in a money market fund; RMDR's fees do not include any internal fees and expenses of any money market fund. Money market funds may be affiliated with the Custodian. Accounts with funds invested in mutual funds will bear a proportionate share of the fund's internal fees and expenses, which are not included in RMDR's fees. Clients should review all fees and expenses charged by mutual funds, RMDR, and others to fully understand the total amount of fees and expenses the client will pay.

For its asset management clients whose fees are charged based on a percentage of assets under RMDR's management, RMDR recommends Fidelity Investments to act as the custodian for the clients' accounts. In formulating this recommendation, RMDR considers the commission price, speed of execution of trades, software available from Fidelity Investments that aids in servicing clients' accounts, and the range of securities products available from Fidelity Investments. Clients may pay commission rates to Fidelity Investments that are higher than commission rates available elsewhere.

RMDR Advisors, Inc. does receive a nominal fee from Annuity Transfers, Inc., for the purchase of structured settlement annuities, a non-securities alternative investment. The rate of return shown by Annuity Transfers, Inc. includes all fees paid to RMDR Advisors, Inc. for the acquisition of the client. No additional fees are paid to RMDR Advisors, Inc.

Use of "no load" funds and no commissions received: Mr. Geary had been, but is not currently, a registered agent with a broker-dealer. RMDR does not sell securities on a commission basis but utilizes no load mutual funds and non-commissioned products.

Please refer to Item 12, Brokerage Practices, elsewhere in this brochure, for more details.

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

No Performance-based fees are accepted: neither Mr. Geary nor any supervised persons either charges or accepts fees based upon a share of the capital gains on or capital appreciation of the assets of a client.

Item 7 – Types of Clients

The majority of the firm's clients are individual investors. The majority of the firm's clients are Mr. Geary's 403(b) plan participants as described in item 4 above. The firm also has several clients who are participants in SEP, SIMPLE IRA, profit-sharing or 401(k) plans. One client is a small charitable organization. There is no minimum account size.

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

Investing in securities involves risk of loss that clients should be prepared to bear.

Every investment has some risk. Generally, the higher risk exposure, the higher the return should be and the higher the chance of losing some or all of the invested money.

Historically, equities have provided a higher return than bonds, and cash returns the least. RMDR uses a diversified portfolio, so not all of a client's money is exposed to the same risk of loss. The percentage of assets in an asset type mixes the risk without limited the return to just one asset class. Our typical portfolio will be balanced with 60 to 80 percent in equities; 20 to 30 percent in a bond fund or bond funds; and 5 to 10 percent in cash or cash equivalents. RMDR does utilize some alternative investment assets such as commodities, principally gold purchased through an ETF fund. RMDR also utilizes structured settlements as an alternative non-security investment for bonds or cash equivalents. These investments are not used without specific consultation with the client.

Diversified portfolio management: RMDR's principal investment strategy is to maintain a diversified portfolio across three asset classes. By asset classes, we mean: equities (mainly publicly traded stocks or mutual funds of stocks); bonds (mainly mutual funds of debt investments and/or individual certificates of deposit); and cash (use of cash reserve accounts of custodian or money market funds).

Clients who are not prepared to lose any money are not placed in equities. Clients who expect large returns should be prepared for the possibility of losing some money depending on the timeframe. As clients have a need for invested money to pay for certain financial needs, the client will be placed in a smaller percentage of equities. The appropriate balance of a client's portfolio is based upon client's expressed financial goals and the financial plan, if any, developed by the firm for the client. Once the portfolio is established according to the initial financial plan or goals, the firm balances the diversified

portfolio no more than once a year unless a client requests more frequent analysis, or unless determined by market conditions and client plan. It is the client's responsibility to inform the firm when his or her circumstances or goals have changed.

Item 9 – Disciplinary Information

RMDR Advisors, Inc. does not have any reportable disciplinary information to disclose.

Item 10 – Other Financial Industry Activities and Affiliations

Relationships with Insurance Companies: Mr. Geary is also a licensed insurance agent. Clients of RMDR who purchase insurance policies and products through Mr. Geary as their agent may pay commissions on these purchases. A portion of any insurance product commissions will be paid to Mr. Geary. Because Mr. Geary could receive a commission on the sale of insurance and insurance products RMDR recommends, a conflict of interest could exist. Clients are under no obligation to conduct insurance transactions through Mr. Geary and are free to go elsewhere for their purchases of insurance policies and products. However, there are custodians such as TIAA-CREF, which do not pay commissions. Further, Mr. Geary did not accept commissions for past sales after March 31, 2011, other than as described in this brochure.

Other Relationships: Mr. Geary is the sole management person in RMDR. RMDR has no other prior or existing relationships than described here which could cause a conflict of interest with the firm's clients. Two supervised persons, Mr. Reimer and Ms. Fritsche, have relationships respectively with an accounting firm and with law firms, as described in Item 4 earlier in this brochure.

Robert J. Geary, President of RMDR Advisors, Inc., is the Manager of 1960 Tour 18 Property LLC, S.A. Wurzbach Property LLC, and Barron Road Leasing LLC, private placements in commercial real estate that are offered to investors. As Manager, Mr. Geary receives a management fee in proportion to the initial investment, based on cash flow during the holding period and subsequent sale of the property.

Robert J. Geary, Jr. (Bobby) may act as a consultant to the firm by providing expertise on real estate investments and for raising money for outside commercial real estate deals from time to time. If so, his compensation will be negotiated. Bobby has over 17 years of experience in commercial real estate lending, direct investment, developments, and servicing. He has worked for major financial institutions in the U.S. as well as internationally. He is currently a Managing Director at 3650 REIT in Dallas. His bio is available upon request.

RMDR may refer certain clients to Legacy Asset Management, Inc. for financial planning services. Mr. Geary will share in commissions on any insurance products sold to the mutual client.

Structured Settlements: Annuity Transfers, Ltd. provides structured settlements which may be purchased by clients. RMDR receives a nominal fee from Annuity Transfers for each product sold, as described in Item 4 above.

For all other financial industry activities and affiliations, Mr. Geary will mitigate any possible conflict of time or interest with RIA clients by ensuring that those clients continue to receive the same level of service as in the past.

Item 11 – Code of Ethics

Code of Ethics: RMDR Advisors, Inc. imposes a fiduciary duty on investment advisors. Further, Ms. Fritsche and Mr. Reimer are subject to standards imposed by the CFRP Board, which imposes a fiduciary duty of care. As a fiduciary, RMDR has a duty of utmost good faith to act solely in the best interests of each of our clients. Our clients entrust us with their funds, which in turn places a high standard on our conduct and integrity. Our fiduciary duty compels all employees to act with the utmost integrity in all of our dealings. This fiduciary duty is the core principle underlying this Code of Ethics and Personal Trading Policy and represents the expected basis of all of our dealings with our clients.

This Code of Ethics consists of the following core principles:

- (1) The interests of clients will be placed ahead of the firm's or any employee's own investment interests.
- (2) Employees are expected to conduct their personal securities transactions in accordance with the Personal Trading Policy and will strive to avoid any actual or perceived conflict of interest with the client. Employees with questions regarding the appearance of a conflict with a client should consult with the Mr. Geary before taking action that may result in an actual conflict.
- (3) Employees will not take inappropriate advantage of their position with the firm.
- (4) Employees are expected to act in the best interest of each of our clients.
- (5) Employees are expected to comply with federal securities laws.

Protection of Material Nonpublic Information: As more fully discussed within our Privacy Policy, employees are expected to exercise diligence and care in maintaining and protecting our client's nonpublic, confidential information.

Personal Conduct: As noted above, employees are expected to conduct themselves with the utmost integrity and to avoid any actual or perceived conflict with our clients.

Outside Business Interests: Any employee wishing to engage in business activities outside of RMDR business must seek approval from the Mr. Geary and, if requested, provide periodic reports to Mr. Geary summarizing those outside business activities.

Annual Employee Acknowledgement: New employees must acknowledge they have read and they understand and agree to comply with this Code of Ethics and Personal Trading Policy. All employees are required to acknowledge as such annually in connection with the firm's annual policy manual acknowledgement process.

Quarterly Report: Each employee must submit to Mr. Geary a quarterly report of personal securities transactions in which the employee had a direct or indirect beneficial ownership interest, as discussed above.

Code of Ethics and Personal Trading Policy Violations: All employees are required to report promptly any violation of this policy to Mr. Geary (including the discovery of any violation committed by another employee).

A copy of our complete Code of Ethics, which is included in our Policy Manual, is available to any client or prospective client upon request.

Privacy Policy: RMDR values its clients' right of privacy concerning their personal financial information. We provide a copy of our privacy policy to new clients before they sign our investment advisory agreement and to all clients annually. The policy provides that we will not share a client's personal financial information with anyone except to provide services for the client's account, to comply with a client's written direction to share the information, or when required or permitted by law. We restrict internal access to clients' nonpublic personal information to only employees who need access to that information in order to provide services to the client.

RMDR Trading Policy for its own accounts: Mr. Geary and the supervised persons of RMDR may buy and sell securities for their own accounts that the firm also recommends to clients. These securities are publicly traded, and it is highly unlikely that transactions by persons affiliated with RMDR could affect the price or performance of the securities. It is possible that an RMDR employee might separately trade in a security at the same time there is an open order pending in the same security for a RMDR client. The personal trade may only happen after trading of that same security has been completed in client accounts. All of RMDR's employees are required to submit their personal trading records quarterly to the chief compliance officer for his review to ensure compliance with this policy.

Item 12 – Brokerage Practices

RMDR Advisors, Inc. has an arrangement with National Financial Services LLC and Fidelity Brokerage Services LLC (collectively, and together with all affiliates, "Fidelity") through

which Fidelity provides RMDR Advisors, Inc. with "institutional platform services." The institutional platform services include, among others, brokerage, custody, and other related services. Fidelity's institutional platform services that assist RMDR Advisors, Inc. in managing and administering clients' accounts include software and other technology that (i) provide access to client account data (such as trade confirmations and account statements); (ii) facilitate trade execution and allocate aggregated trade orders for multiple client accounts; (iii) provide research, pricing and other market data; (iv) facilitate payment of fees from its clients' accounts; and (v) assist with back-office functions, recordkeeping and client reporting.

Fidelity also offers other services intended to help RMDR Advisors, Inc. manage and further develop its advisory practice. Such services include, but are not limited to, performance reporting, financial planning, contact management systems, third party research, publications, access to educational conferences, roundtables and webinars, practice management resources, access to consultants and other third-party service providers who provide a wide array of business-related services and technology with whom RMDR Advisors, Inc. may contract directly.

RMDR Advisors, Inc. is independently operated and owned and is not affiliated with Fidelity.

Fidelity generally does not charge its advisor clients separately for custody services but is compensated by account holders through commissions and other transaction-related or asset-based fees for securities trades that are executed through Fidelity or that settle into Fidelity accounts (i.e., transactions fees are charged for certain no-load mutual funds, commissions are charged for individual equity and debt securities transactions). Fidelity provides access to many no-load mutual funds without transaction charges and other no-load funds at nominal transaction charges.

Fidelity is providing RMDR Advisors, Inc. with certain brokerage and research products and services that qualify as "brokerage or research services" under Section 28(e) of the Securities Exchange Act of 1934 ("Exchange Act").

RMDR Advisors, Inc. participates in the Fidelity Wealth Advisor Solutions program. Wealth Advisor Solutions is a referral program designed to introduce high net worth investors to independent registered investment advisors. RMDR Advisors, Inc. does not pay a fee to participate in the Wealth Advisor Solutions Program. RMDR Advisors, Inc. participation in the program may raise potential conflicts of interest. RMDR Advisors, Inc. may have an incentive to recommend that clients custody their assets with Fidelity.

Item 13 – Review of Accounts

As described in Item 8 earlier, RMDR reviews a client's diversified portfolio for at least once a year. Mr. Geary, Ms. Fritsche, and Mr. Zabriskie, however, strive to review client accounts at least on a quarterly basis for any exceptional event, or any time at the client's request. It is the client's responsibility to inform the firm of his or her changes circumstance or revised goals. Clients should also review their custodian account statements at least quarterly.

Client account reviews usually consist of a spreadsheet of accounts, positions and balances. Other items may also be included, as requested by the client or recommended by the advisor. Clients should also review their custodian account statements at least quarterly.

Item 14 – Client Referrals and Other Compensation

The firm does not receive compensation from other than clients for providing investment advice. Employees may be compensated for bringing clients to the firm.

Item 15 – Custody

Clients should receive at least quarterly statements from the qualified custodian that holds and maintains client's investment assets. Clients should review their custodian account statements at least quarterly. RMDR Advisors, Inc. urges clients to carefully review such statements and compare such official custodial records to the account information that we may provide to clients. Our spreadsheets may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

RMDR will not maintain custody of the property in the RIA clients' accounts; the client will enter an agreement with a brokerage firm ("the Custodian") under which the Custodian will maintain custody of the property in the accounts. For asset management clients who pay fees based on a percentage of assets under management, RMDR usually recommends Fidelity to act as the Custodian for the clients' accounts. See Item 12 above.

Item 16 – Investment Discretion

As described in Item 8 above, RMDR require clients to sign an investment advisory agreement with RMDR. The agreement provides that it shall be continuous until one party to the agreement terminates it.

RMDR's investment management clients grant RMDR complete discretion over the selection and amount of securities to be purchased or sold and the commission rates to be paid for their account without obtaining the client's prior consent or approval.

Clients may impose restrictions on investing in certain securities or types of securities. Clients may provide with the execution of the investment advisory agreement written investment objectives, guidelines, or conditions for the client's accounts. For example, a client may specify that the investment in any particular stock or industry should not exceed specified percentages of the value of the portfolio, or the client may restrict or prohibit investments in the securities of a specific industry.

Item 17 – Voting Client Securities

RMDR Advisors, Inc. discretionary investment advisory agreement with clients provides that we will not vote proxies for the client's account. If the account is a pension plan or otherwise covered by the Employment Retirement Income Security Act (ERISA), the client must designate in writing another fiduciary who will vote proxies for the account. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. RMDR Advisors, Inc. may provide advice to clients regarding the clients' voting of proxies.

Item 18 – Financial Information

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about their financial condition. RMDR Advisors, Inc. has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and neither RMDR Advisors, Inc. or its predecessor, Geary Investment Advisory Services, has been the subject of a bankruptcy proceeding. RMDR Advisors, Inc. does not require or solicit prepayment of more than \$1,200 in investment fees per client. Investment fees, as described in Item 5 above, are not paid in advance. Therefore, RMDR Advisors, Inc. is not required to submit a balance sheet in this section.