

# **RD Lewis Holdings, Inc.**

## **Form ADV Part 2 – Disclosure Brochure**

**Effective: September 18, 2020**

This Form ADV 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of RD Lewis Holdings, Inc. (“RD Lewis” or the “Advisor”). If you have any questions about the contents of this Brochure, please contact the Advisor at (407) 446-3737 or by email at [dee@rdlewisholdings.com](mailto:dee@rdlewisholdings.com).

RD Lewis is a registered investment advisor 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 advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information through RD Lewis to assist you in determining whether to retain the Advisor.

Additional information about RD Lewis and its Advisory Persons is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor’s firm name or CRD# 156073.

**RD Lewis Holdings, Inc.  
121 S. Orange Ave., Suite 1500, Orlando, FL 32801  
Phone: (407) 446-3737 \* (407) 250-7010**

## **Item 2 - Material Changes**

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Form ADV 2 is divided into two parts: Part 2A (the "Disclosure Brochure") and Part 2B (the "Brochure Supplement"). The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about the Advisory Persons of RD Lewis. For convenience, the Advisor has combined these documents into a single disclosure document.

RD Lewis believes that communication and transparency are the foundation of its relationship with clients and continually strive to provide you with the complete and accurate information at all times. RD Lewis encourages all current and prospective clients to read this Disclosure Brochure and discuss any questions you may have with the Advisor.

### Material Changes

The following material changes have been made to this Disclosure Brochure since the last filing and distribution to Clients:

- The Advisor is now regulated by the U.S. Securities and Exchange Commission ("SEC").
- The Advisor changed its principal office location to 121 S. Orange Ave., Suite 1500, Orlando, FL 32801.
- The Advisor has amended its range of fee for investment management services. Please see Item 5A for additional details.
- The Advisor now offers financial planning services as a stand-alone service. Please see Item 4 and Item 5 for additional details.

### Future Changes

From time to time, the Advisor may amend this Disclosure Brochure to reflect changes in business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or this summary of Material Changes shall be provided to you annually or if a material change is made.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or CRD# 156073. You may also request a copy of this Disclosure Brochure at any time by contacting the Advisor at (407) 446-3737 or by email at [dee@rdlewisholdings.com](mailto:dee@rdlewisholdings.com).

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## **Item 4 – Advisory Services**

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### **A. Firm Information**

RD Lewis Holdings, Inc. (“RD Lewis” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). The Advisor is organized as a corporation under the laws of Florida. RD Lewis was founded in July 2010 and is owned and operated by Delcena D. Lewis (President) and Richard A. Lewis (Vice President, Chief Compliance Officer and Secretary). This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by RD Lewis.

### **B. Advisory Services Offered**

RD Lewis provides investment management services to individuals, high net worth individuals, families, trusts, estates and businesses (each referred to as a “Client”).

The Advisor serves as a fiduciary to Clients, as defined under the applicable laws and regulations. As a fiduciary, the Advisor upholds a duty of loyalty, fairness and good faith towards each Client and seeks to mitigate potential conflicts of interest. RD Lewis’ fiduciary commitment is further described in the Advisor’s Code of Ethics. For more information regarding the Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

#### Investment Management Services

RD Lewis provides custom investment management services, according to the Client’s objectives, time horizon and tolerance for risk. This is achieved through continuous personal Client contact and interaction while providing discretionary investment management and related advisory services. RD Lewis emphasizes a long-term investment time horizon, where appropriate. RD Lewis primarily recommends that its Clients allocate investment management assets among various mutual funds and exchange-traded funds (“ETFs”) as appropriate for the type of account[s]. RD Lewis selects mutual funds and ETFs by using various criteria, such as the fund manager’s tenure, and/or overall career performance, tracking to its benchmark and overall expense ratios. The Advisor may also utilize other types of investments, as appropriate, to meet the needs of its Clients.

RD Lewis may recommend, on occasion, redistributing investment allocations to diversify the portfolio in an effort to reduce risk and increase performance. RD Lewis may recommend specific positions to increase sector weighting and/or dividend potential. The Advisor may recommend employing cash positions as a possible hedge against market movement. RD Lewis may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of the Client, or any risk deemed unacceptable for the Client’s risk tolerance.

At no time will RD Lewis accept or maintain custody of a Client’s funds or securities, except for the limited authority as outlined in Item 15 – Custody. All Client assets will be managed within their designated account[s] at the Custodian, pursuant to the Client investment advisory agreement, please see Item 12 – Brokerage Practices.

#### Financial Planning Services

RD Lewis offers a variety of financial planning and consulting services to Clients, pursuant to a written financial planning agreement. Services are offered in several areas of a Client’s financial situation, depending on their goals and objectives.

Generally, such financial planning services involve preparing a formal financial plan or rendering a specific financial consultation based on the Client’s financial goals and objectives. This planning or consulting may encompass one or more areas of need, including but not limited to, investment planning, retirement planning, personal savings, education savings, insurance needs and other areas of a Client’s financial situation.

A financial plan developed for, or financial consultation rendered to the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs, commence or alter retirement savings, establish education savings and/or charitable giving programs.

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RD Lewis may also refer Clients to an accountant, attorney or other specialists, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of the Client's financial situation, observations, and recommendations. For consulting or ad-hoc engagements, the Advisor may not provide a written summary. Plans or consultations are typically completed within six (6) months of contract date, assuming all information and documents requested are provided promptly.

Financial planning and consulting recommendations pose a conflict between the interests of the Advisor and the interests of the Client. For example, the Advisor has an incentive to recommend that Clients engage the Advisor for investment management services or to increase the level of investment assets with the Advisor, as it would increase the amount of advisory fees paid to the Advisor. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to implement the transaction through the Advisor.

### **C. Client Account Management**

Prior to engaging RD Lewis to provide investment advisory services, each Client is required to enter into one or more agreements with the Advisor that define the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Strategy – RD Lewis in connection with the Client, will develop a strategy that seeks to achieve the Client's and objectives.
- Asset Allocation – RD Lewis will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance for risk for each Client.
- Portfolio Construction – RD Lewis will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – RD Lewis will provide investment management and ongoing oversight of the Client's investment portfolio.

### **D. Wrap Fee Programs**

RD Lewis does not place Client assets into a wrap fee program. Investment management services are provided directly by RD Lewis.

### **E. Assets Under Management**

As of August 28, 2020, RD Lewis manages \$118,110,776 in assets, all of which are on a discretionary basis. Clients may request more current information at any time by contacting the Advisor.

## **Item 5 – Fees and Compensation**

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The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client engaging the Advisor for services described herein shall be required to enter into a written agreement with the Advisor.

### **A. Fees for Advisory Services**

#### **Investment Management Services**

Investment management fees are paid quarterly, at the end of each calendar quarter, based on the market value of assets under management at the end of each calendar quarter. Investment management fees range from 0.50% to 1.00% depending on the size and complexity of the Client relationship. Client relationships with multiple investment objectives, frequent re-balancing needs and other complexities may be charged a higher fee. Certain Legacy Clients may have fees that differ from the above fee range.

The investment management fee in the first calendar quarter of service is prorated to the inception date of the account[s] to the end of the first quarter. Investment advisory fees are negotiable at the sole discretion of the Advisor. All securities held in a portfolio managed by RD Lewis will be independently valued by the Custodian. RD Lewis will not have the authority or responsibility to value portfolio securities.

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The Advisor's fee is exclusive of, and in addition to any applicable securities transaction and custody fees, and other related costs and expenses described in Item 5.C below, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs.

#### Financial Planning Services

RD Lewis offers financial planning services at an hourly rate ranging from \$125 to \$250. Fees may be negotiable based on the nature and complexity of the services to be provided and the overall relationship with the Advisor. An estimate for total hours and overall costs will be provided to the Client prior to engaging for these services.

### **B. Fee Billing**

#### Investment Management Services

Investment management fees will be calculated by the Advisor and deducted from the Client's account[s] at the Custodian. The Advisor shall send a quarterly invoice to the Custodian indicating the amount of the fees to be deducted from the Client's account[s]. For assets custodied with LPL Financial LLC, investment management fees will be calculated and deducted from the Client's accounts[s] at the Custodian. The amount due is calculated by applying the quarterly rate (annual rate divided by 365 multiplied by the number of days in the quarter) to the total assets under management with RD Lewis at the end of each calendar quarter. The Advisor will then adjust fees for any additions or withdrawals in the account[s]. Clients will receive independent statements from the Custodian no less frequently than quarterly. Clients provide written authorization permitting advisory fees to be deducted by RD Lewis to be paid directly from their account[s] held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian. It is the responsibility of the Client to verify the accuracy of these fees as listed on the custodian's brokerage statement as the custodian does not assume this responsibility.

#### Financial Planning Services

Financial planning fees shall be invoiced upon completion of the agreed upon deliverable[s].

### **C. Other Fees and Expenses**

Clients may incur certain fees or charges imposed by third parties, other than RD Lewis, in connection with investment made on behalf of the Client's account[s]. The Client is responsible for all custody and securities execution fees charged by the Custodian, as applicable. The investment advisory fee charged by RD Lewis is separate and distinct from these custody and execution fees.

In addition, all fees paid to RD Lewis for investment advisory services are separate and distinct from the expenses charged by mutual funds and ETFs to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client may be able to invest in these products directly, without the services of RD Lewis, but would not receive the services provided by RD Lewis which are designed, among other things, to assist the Client in determining which products or services are most appropriate to each Client's financial condition and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by RD Lewis to fully understand the total fees to be paid.

### **D. Advance Payment of Fees and Termination**

#### Investment Management Services

RD Lewis is compensated for its services in at the end of each calendar quarter, after investment management services are rendered. Either party may terminate the investment advisory agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the investment agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. The Client's investment advisory agreement with the Advisor is non-transferable without Client's prior consent.

#### Financial Planning Services

RD Lewis is compensated for its services upon completion of the engagement deliverable[s]. Either party may terminate the financial planning agreement by providing advance written notice to the other party. The Client may also terminate the financial planning agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services

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rendered to the point of termination and such fees will be due and payable by the Client. Upon termination, the Client shall be billed for actual hours logged on the planning project times the contractual hourly rate. The Client's financial planning agreement with the Advisor is non-transferable without the Client's prior consent.

#### **E. Compensation for Sales of Securities**

RD Lewis does not buy or sell securities and does not receive any compensation for transactions in any Client account.

### **Item 6 – Performance-Based Fees**

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RD Lewis does not charge performance-based fees for its investment advisory services. The fees charged by RD Lewis are as described in Item 5 above and are not based upon the capital appreciation of the funds or securities held by any Client.

RD Lewis does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options for its Clients.

### **Item 7 – Types of Clients**

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RD Lewis provides investment management services to individuals, high net worth individuals, families, trusts, estates and businesses. The amount of each type of Client is available on the Advisor's Form ADV Part 1A. These amounts may change over time and are updated at least annually by the Advisor. RD Lewis does not impose a minimum relationship size for its advisory services.

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

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#### **A. Methods of Analysis**

RD Lewis utilizes fundamental analysis in developing investment strategies for its Clients. Research and analysis is derived from numerous sources, including financial media companies, third-party research materials, and review of company activities, including as annual reports, prospectuses, press releases and research prepared by others. RD Lewis also obtains information from regulatory reports and other sources as appropriate. The Advisor also utilizes information obtained from regulatory releases, the Internet, information provided at conferences and other information obtained from regulatory sources.

*Fundamental analysis* utilizes economic and business indicators as investment selection criteria. These criteria are generally ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

As noted above, RD Lewis generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. RD Lewis will typically hold all or a portion of a security for more than a year, but for adjustments made for purposes of rebalancing the portfolio. At times, RD Lewis may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector or asset class.

#### **B. 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. RD Lewis will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals. Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account[s]. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account[s]. The Advisor shall rely on the financial

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and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

RD Lewis generally employs investment strategies that do not involve any significant or unusual risk other than domestic equity and international market risks. The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. Following are some of the risks associated with the Advisor's investment approach:

#### Market Risks

The value of a Client's holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad. This risk is linked to the performance of the overall financial markets.

#### ETF Risks

The performance of ETFs is subject to market risk, including the possible loss of principal. The value of the ETFs will fluctuate with the value of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs has a large bid-ask spread and low volume. Authorized participants in an ETF may change at any time; this may result in change to the liquidity and the ability to redeem the ETF as the authorized participants control the number of shares of the ETF. The value of an ETF fluctuates based upon the market movements and may disassociate from the index being tracked or from the value of the underlying investments. An ETF purchased or sold at one point in the day may have a different value than the same ETF purchased or sold a short time later.

#### Mutual Fund Risks

The performance of mutual funds is subject to market risk, including the possible loss of principal. The value of the mutual funds will fluctuate with the value of the underlying securities that make up the funds. The value of a mutual fund is typically set daily therefore a mutual fund purchased at one point in the day will typically have the same value as a mutual fund purchased later that same day.

**Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.**

### **Item 9 – Disciplinary Information**

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**There are no legal, regulatory or disciplinary events involving RD Lewis or its management persons.** RD Lewis values the trust Clients place in the Advisor. The Advisor encourages Clients to perform the requisite due diligence on any advisor or service provider that the Client engages. The backgrounds of the Advisor and its Advisory Persons are available on the Investment Adviser Public Disclosure website at <http://adviserinfo.sec.gov> by searching with the Advisor's firm name or CRD# 156073.

### **Item 10 – Other Financial Activities and Affiliations**

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#### Insurance Agency Affiliations

Ms. Lewis is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from her role with RD Lewis. As an insurance professional, Ms. Lewis will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular advisory fees. Ms. Lewis not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Ms. Lewis or the Advisor.

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## **Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading**

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

RD Lewis has implemented a Code of Ethics that defines the Advisor's fiduciary commitment to each Client. This Code of Ethics applies to all persons associated with RD Lewis ("Supervised Persons"). The Code of Ethics was developed to provide general ethical guidelines and specific instructions regarding the Advisor's duties to the Client. RD Lewis and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of RD Lewis's Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code of Ethics covers a range of topics that may address ethics and conflicts of interest. To request a copy of the Code of Ethics, please contact the Advisor at (407) 446-3737 or by email [dee@rdlewisholdings.com](mailto:dee@rdlewisholdings.com).

### **B. Personal Trading with Material Interest**

RD Lewis allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. RD Lewis does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund, or advise an investment company. RD Lewis does not have a material interest in any securities traded in Client accounts.

### **C. Personal Trading in Same Securities as Clients**

RD Lewis allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities that are recommended (purchase or sell) to Clients presents a conflict of interest that, as fiduciaries, must disclosed and mitigated through policies and procedures. As noted above, the Advisor has adopted the Code to address insider trading (material non-public information controls); gifts and entertainment; outside business activities and personal securities reporting. When trading for personal accounts, Supervised Persons have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by RD Lewis requiring reporting of personal securities trades by its Supervised Persons for review by the Chief Compliance Officer ("CCO") or delegate. The Advisor has also adopted written policies and procedures to detect the misuse of material, non-public information.

### **D. Personal Trading at Same Time as Client**

While RD Lewis allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterwards. At no time will RD Lewis, or any Supervised Person of RD Lewis, transact in any security to the detriment of any Client.

## **Item 12 – Brokerage Practices**

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### **A. Recommendation of Custodian[s]**

RD Lewis does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The Client will engage the broker-dealer/custodian (herein the "Custodian") to safeguard Client assets and authorize RD Lewis to direct trades to the Custodian as agreed upon in the investment advisory agreement. Further, RD Lewis does not have the discretionary authority negotiate commissions on behalf of Clients on a trade-by-trade basis.

Where RD Lewis does not exercise discretion over the selection of the Custodian, it may recommend the Custodian to Clients for custody and execution services. Clients are not obligated to use the Custodian recommended by the Advisor and will not incur any extra fee or cost associated with using a custodian not recommended by RD Lewis. However, the Advisor may be limited in the services it can provide if the recommended Custodian is not engaged. RD Lewis may recommend the Custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, and/or its reputation. RD Lewis does not receive research services, other products, or compensation as a result of recommending the Custodian that may result in the Client paying higher commissions than those obtainable through other broker-dealers/custodians. RD Lewis generally recommends that Clients establish their account[s]

at LPL Financial LLC ("LPL Financial"). LPL Financial is an independent and unaffiliated SEC-registered broker-dealer and FINRA member. Please see Item 14 below.

**1. Soft Dollars** - Soft dollars are revenue programs offered by broker-dealers/custodians whereby an advisor enters into an agreement to place security trades with a broker-dealer/custodian in exchange for research and other services. **RD Lewis does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodian. However, the Advisor does receive certain economic benefits from the Custodian.** Please see Item 14 below.

**2. Brokerage Referrals** - RD Lewis does not receive any compensation from any third party in connection with the recommendation for establishing an account.

**3. Directed Brokerage** - All Clients are serviced on a "directed brokerage basis", where RD Lewis will place trades within the established account[s] at the Custodian designated by the Client. Further all Client accounts are traded within their respective account[s] at the Custodian. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). RD Lewis will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the Custodian.

#### **B. Aggregating and Allocating Trades**

RD Lewis does not aggregate orders in a block trade multiple Client accounts when placing securities trades. Each Client account is traded individually within its established brokerage account[s] at the designated Custodian. Trades for similar securities for multiple accounts will be done in a way that does not consistently advantage or disadvantage particular Clients' accounts.

### **Item 13 – Review of Accounts**

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#### **A. Frequency of Reviews**

Securities in Client accounts are monitored on a regular basis by Ms. Lewis, President of the Advisor. Formal Client reviews are conducted at least annually or more frequently at the Client's request.

#### **B. Causes for Reviews**

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more or less frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account[s]. The Client is encouraged to notify RD Lewis if changes occur in his/her personal financial situation that might adversely affect his/her investment plan. Additional reviews may be triggered by material market, economic or political events.

#### **C. Review Reports**

The Client will receive brokerage statements no less than quarterly from the Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s].

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

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#### **A. Compensation Received by RD Lewis**

RD Lewis is a fee-based advisory firm that is compensated solely by its Clients and not from any investment product. RD Lewis does not receive commissions or other compensation from product sponsors, broker-dealers or any un-related third party. RD Lewis may refer Clients to various unaffiliated, non-advisory professionals (e.g. attorneys, accountants, estate planners) to provide certain financial services necessary to meet the goals of its Clients. Likewise, RD Lewis may receive non-compensated referrals of new Clients from various third-parties.

#### Participation in Institutional Advisor Platform

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RD Lewis has established an institutional relationship with LPL Financial to assist the Advisor in managing Client account[s]. Access to the LPL Financial platform is provided at no charge to the Advisor. The Advisor receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at LPL Financial. The software and related systems support may benefit the Advisor, but not its Clients directly. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a Custodian creates a potential conflict of interest since these benefits may influence the Advisor's recommendation of this Custodian over one that does not furnish similar software, systems support, or services.

#### **B. Client Referrals from Solicitors**

RD Lewis does not engage paid solicitors for Client referrals.

### **Item 15 – Custody**

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All Clients must place their assets in a “qualified custodian”. Clients are required to engage the Custodian to retain their funds and securities and direct RD Lewis to utilize the Custodian for the Client’s security transactions. Clients should review statements provided by the Custodian and compare to any reports provided by RD Lewis to ensure accuracy, as the Custodian does not perform this review. For more information custodians and brokerage practices, see Item 12 – Brokerage Practices.

If the Client gives the Advisor authority to move money from one account to another account, the Advisor may have custody of those assets. In order to avoid additional regulatory requirements, the Custodian and the Advisor have adopted safeguards to ensure that the money movements are completed in accordance with the Client’s instructions.

### **Item 16 – Investment Discretion**

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RD Lewis generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by RD Lewis. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an investment advisory agreement containing all applicable limitations to such authority. All discretionary trades made by RD Lewis will be in accordance with each Client's investment objectives and goals. For non-discretionary accounts, RD Lewis does not have the authority to trade securities in Client accounts without first obtaining approval by the Client.

### **Item 17 – Voting Client Securities**

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RD Lewis does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

### **Item 18 – Financial Information**

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Neither RD Lewis, nor its management has any adverse financial situations that would reasonably impair the ability of RD Lewis to meet all obligations to its Clients. RD Lewis have not been subject to a bankruptcy or financial compromise. RD Lewis is not required to deliver a balance sheet along with this Disclosure Brochure as the firm does not collect fees of \$500 or more for services to be performed six months or more in advance.

# **Form ADV Part 2B – Individual Disclosure Brochure**

**for**

**Delcena D. Lewis**  
**President and Investment Advisor Representative**

**Effective: September 18, 2020**

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of Delcena D. Lewis (CRD# 4468804) in addition to the information contained in the RD Lewis Holdings, Inc. ("RD Lewis" or the "Advisor" CRD #156073) Disclosure Brochure. If you have not received a copy of this Brochure Supplement or if you have any questions about the contents of this Brochure Supplement or RD Lewis's Disclosure Brochure, please contact the Advisor at (407) 446-3737 or by email at [dee@rdlewisholdings.com](mailto:dee@rdlewisholdings.com).

Additional information about Delcena D. Lewis is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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**RD Lewis Holdings, Inc.**

121 S. Orange Ave., Suite 1500, Orlando, FL 32801  
Phone: (407) 446-3737 \* Fax: (407) 250-7010

## Item 2 – Educational Background and Business Experience

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Delcena D. Lewis, born in 1971, is the President and an Investment Advisor Representative of RD Lewis Ms. Lewis earned a Bachelors in Mathematics from the University of South Carolina in 1990. Ms. Lewis also earned a Bachelors in Business Administration from the University of Phoenix in 2002. Additional information regarding Ms. Lewis's employment history is included below.

### Employment History:

President and Investment Advisor Representative, RD Lewis Holdings, Inc.	12/2010 to Present
Investment Advisor Representative, IFP Advisors, Inc.	08/2016 to 08/2018
Insurance Agent, Self-Employed	07/2007 to 12/2010
Insurance Agent, Lincoln Financial Group	07/2006 to 07/2007
Retirement Specialist, MetLife Securities and MetLife Insurance Company	12/1996 to 12/2004

## Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Ms. Lewis.*** Ms. Lewis has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Ms. Lewis. Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Ms. Lewis.***

The Advisor encourages you to independently view the background of Ms. Lewis on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with her full name or Individual CRD# 4468804.

## Item 4 – Other Business Activities

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### Insurance Agency Affiliations

Ms. Lewis is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from her role with RD Lewis. As an insurance professional, Ms. Lewis will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Ms. Lewis is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Ms. Lewis or the Advisor.

## Item 5 – Additional Compensation

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Ms. Lewis has additional business activities where compensation is received that are detailed in Item 4 above.

## Item 6 – Supervision

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Ms. Lewis serves as the President and and Investment Advisor Representative of RD Lewis and is supervised by Richard Lewis, the Chief Compliance Officer. Mr. Lewis can be reached at (407) 969-9104.

RD Lewis has implemented a Code of Ethics, an internal compliance document that guides it Supervised Persons in meeting their fiduciary obligations to Clients of RD Lewis. Further, RD Lewis is subject to regulatory oversight by various agencies. These agencies require registration by RD Lewis and its Supervised Persons. As a registered entity, RD Lewis is subject to examinations by regulators, which may be announced or

unannounced. RD Lewis is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

# **Form ADV Part 2B – Brochure Supplement**

**for**

**Regina S. Blake-Anderson  
Office Administrator**

**Effective: September 18, 2020**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Regina S. Blake-Anderson (CRD# 6699445) in addition to the information contained in the RD Lewis Holdings, Inc. (“RD Lewis” or the “Advisor”, CRD# 156073) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the RD Lewis Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (407) 446-3737.

Additional information about Ms. Blake-Anderson is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with her full name or her Individual CRD# 6699445.

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**RD Lewis Holdings, Inc.**

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## Item 2 – Educational Background and Business Experience

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Regina S. Blake-Anderson, born in 1985, is dedicated to advising Clients of RD Lewis as an Office Administrator. Ms. Blake-Anderson also earned a BBA degree in Finance from American Intercontinental University in 2018. Additional information regarding Ms. Blake-Anderson's employment history is included below.

### Employment History:

Office Administrator, RD Lewis Holdings, Inc.	04/2012 to Present
Office Administrator, Commercial Metals Company	04/2008 to 08/2012
Business Banking, SunTrust Bank	05/2005 to 03/2008

## Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Ms. Blake-Anderson.*** Ms. Blake-Anderson has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Ms. Blake-Anderson.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Ms. Blake-Anderson.***

The Advisor encourages you to independently view the background of Ms. Blake-Anderson on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with her full name or her Individual CRD# 6699445.

## Item 4 – Other Business Activities

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Ms. Blake-Anderson is dedicated to the investment advisory activities of RD Lewis's Clients. Ms. Blake-Anderson does not have any other business activities.

## Item 5 – Additional Compensation

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Ms. Blake-Anderson is dedicated to the investment advisory activities of RD Lewis's Clients. Ms. Blake-Anderson does not receive any additional forms of compensation.

## Item 6 – Supervision

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Ms. Blake-Anderson serves as an Office Administrator of RD Lewis and is supervised by Richard Lewis, the Chief Compliance Officer. Mr. Lewis can be reached at (407) 446-3737.

RD Lewis has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of RD Lewis. Further, RD Lewis is subject to regulatory oversight by various agencies. These agencies require registration by RD Lewis and its Supervised Persons. As a registered entity, RD Lewis is subject to examinations by regulators, which may be announced or unannounced. RD Lewis is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

## Privacy Policy

Effective: September 18, 2020

### Our Commitment to You

RD Lewis Holdings, Inc. ("RD Lewis" or the "Advisor") is committed to safeguarding the use of personal information of our Clients (also referred to as "you" and "your") that we obtain as your Investment Advisor, as described here in our Privacy Policy ("Policy").

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. RD Lewis (also referred to as "we", "our" and "us") protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

RD Lewis does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

### Why you need to know?

Registered Investment Advisors ("RIAs") must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

### What information do we collect from you?

Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number[s]	Income and expenses
E-mail address[es]	Investment activity
Account information (including other institutions)	Investment experience and goals

### What Information do we collect from other sources?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

### How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client's personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

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#### RD Lewis Holdings, Inc.

121 S. Orange Ave., Suite 1500, Orlando, FL 32801  
Phone: (407) 446-3737 \* Fax: (407) 250-7010

### How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
<b>Servicing our Clients</b> We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.	Yes	No
<b>Marketing Purposes</b> RD Lewis does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where RD Lewis or the client has a formal agreement with the financial institution. <b>We will only share information for purposes of servicing your accounts, not for marketing purposes.</b>	No	Not Shared
<b>Authorized Users</b> Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent[s] or representative[s].	Yes	Yes
<b>Information About Former Clients</b> RD Lewis does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

### Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this Policy, and will provide you with a revised policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

### Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (407) 446-3737.