



RICHMOND CAPITAL MANAGEMENT
Experience, Knowledge, Service

Richmond Capital Management, Inc.

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Chief Compliance Officer

Part 2A of Form ADV

Firm Brochure

Summary of Material Changes

March 30, 2021

This brochure provides information about the qualifications and business practices of Richmond Capital Management. If you have any questions about the contents of this brochure, please contact us at (804) 379-8280 and/or services@richmondcap.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 Richmond Capital Management is available on the SEC's website at www.adviserinfo.sec.gov. Our CRD number is 104636. Richmond Capital Management is a "registered investment adviser." Registration does not imply a certain level of skill or training.

Material Changes

Below is a summary list of material changes to Part 2A of Form ADV (Firm Brochure) dated April 24, 2020. You may obtain a copy of the new brochure by contacting Howard Bos, President at (804) 379-8283 or hbos@richmondcap.com, or Betsy Harris, Managing Director, Client Services at (804) 379-8282 or eharris@richmondcap.com.

Item 5 (Fees and Compensation)

- Billable assets may be based on market values derived either from the client's custodian or Registrant's pricing feed from Bloomberg
- Clients billed in arrears generally pay fees on the balance of assets on the last day of the preceding calendar quarter and clients paying in advance pay on assets as of the last business day of the most recent calendar quarter
- Billable assets for the quarter include accrued interest on investments and cash.
- The maximum fee charged is 40bps
- For our clients with smaller accounts, we may purchase exchange traded funds as a proxy for exposure to an asset class rather than purchasing individual bonds. These exchanged traded funds incur product level fees that are paid by the client when we recommend these securities for investment.

Item 8 (Methods of Analysis, Investment Strategies and Risk of Loss)

- Our Opportunistic Municipal CEF strategy, invests in CEFs that employ leverage as part of its strategy. Leverage risk is inherent in these investment strategies pursued by the firm.

Item 12 (Brokerage Practices)

- We are limited in our ability to achieve most favorable execution for accounts (and thereby, could cost clients more money) where we only deliver the investment model and where Turnkey Asset Management Platforms (Envestnet) can only be used to execute the trades for the account.