RPC Private Wealth, LLC
Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of RPC Private Wealth, LLC. If you have any questions about the contents of this brochure, please contact us at (630) 887-8488 or by email at: Tomw@retpro.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 RPC Private Wealth, LLC is also available on the SEC's website at www.adviserinfo.sec.gov. RPC Private Wealth, LLC's CRD number is: 298527.

120 E. Ogden Avenue Suite 102
Hinsdale, IL 60521
(630) 887-8488
Tomw@retpro.com

Registration as an investment adviser 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 RPC Private Wealth, LLC on 03/24/2020 are described below. Material changes relate to RPC Private Wealth, LLC's policies, practices or conflicts of interests.

- The firm has transitioned to registration with the United States Securities and Exchange Commission from its prior registration at the state level.
- The firm has updated their Assets Under Management (Item 4.E).
- The firm has updated outside business activities (Item 5, Item 10).

Item 3: Table of Contents

Item 1: Cover Page

Item 2: Material Changes ii

Item 3: Table of Contents iii

Item 4: Advisory Business 2

Item 5: Fees and Compensation 4

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

Item 7: Types of Clients 6

Item 8: Methods of Analysis, Investment Strategies, & Risk of Loss 7

Item 9: Disciplinary Information 10

Item 10: Other Financial Industry Activities and Affiliations 10

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

Item 12: Brokerage Practices 12

Item 13: Review of Accounts 13

Item 14: Client Referrals and Other Compensation 14

Item 15: Custody 15

Item 16: Investment Discretion 16

Item 17: Voting Client Securities (Proxy Voting) 16

Item 18: Financial Information 16

Item 4: Advisory Business

A. Description of the Advisory Firm

RPC Private Wealth, LLC (hereinafter "RPCPW") is a Limited Liability Partnership organized in the State of Illinois. The firm was formed in September 2018, and the principal owner is Thomas Edward Westrick.

B. Types of Advisory Services

Portfolio Management Services

RPCPW offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client.

RPCPW evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. RPCPW will require discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction.

RPCPW seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of RPCPW's economic, investment or other financial interests. To meet its fiduciary obligations, RPCPW attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, RPCPW'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 RPCPW's policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent among its clients on a fair and equitable basis over time.

RPCPW provides account management under three levels of service structures. Our first structure is a comprehensive service that provides account management on a continuous basis and is referred to internally and with clients as our FundMAP platform. Clients on FundMAP have Charles Schwab as the custodian of their accounts. Clients' accounts on the FundMAP platform have their account transactions reviewed daily by all advisors in the firm, receive quarterly performance reports, have more frequent meetings, written, and oral communications with their RPCPW advisor regarding their accounts and other financial planning topics, have the activity in their accounts reviewed at least quarterly, generally utilize a more robust variety of investment managers and styles, and are likely to have more account maintenance trades (such as rebalancing and capital gain/loss management) done in their accounts. Due to the more engaged level of advisory service, clients on the FundMAP platform are likely to be charged the highest advisory fee. Our second structure provides a less robust level of investment advisory service and is referred to internally and with clients as our F2 platform. Under this platform, clients' accounts

use American Funds mutual fund company as their custodian. Investments utilized are exclusively American Funds and almost exclusively use their "F2" fee only share class. Under this platform, clients pay the lowest level of advisory fee. RPCPW's ongoing account management services are more limited and typically do not include more than annual account reviews and rebalancing trades. Client meetings are generally limited to annual in person or phone calls, and modest consulting conversations related to non-portfolio financial planning topics and issues. Our third structure of service is referred to as our variable annuity and 529 plan platforms. Clients on this platform typically have Nationwide Advisory Services Company serve as the custodian of their variable annuity accounts and Bright Directions or American Funds serve as the custodian of their 529 plan accounts. Under this platform, clients typically pay an advisory fee slightly above the F2 platform but less than the FundMAP platform. The level and complexity of advisory and financial planning services provided to clients on this platform are similar to those provided on the F2 platform. Under all platforms, subject to a grant of discretionary authority, RPCPW, through its IARs or any recommended sub-advisers, shall invest and reinvest the securities, cash or other property held in the client's account in accordance with the client's investment objectives as identified by the client during initial interviews and information gathering sessions. Such suitability information is reviewed and updated as needed by the client's advisor at least annually.

Financial Planning

Financial plans and financial planning may include, but are not limited to: investment planning; life insurance; tax concerns; retirement planning; college planning; and debt/credit planning.

Services Limited to Specific Types of Investments

RPCPW generally limits its investment advice to mutual funds, real estate funds (including REITs), and Exchange Traded Funds (ETFs). RPCPW primarily recommends clients invest mostly in mutual funds and ETFs. RPCPW may use other securities as well to help diversify a portfolio when applicable.

C. Client Tailored Services and Client Imposed Restrictions

RPCPW offers the same suite of services to all of its clients. However, specific client investment strategies and their implementation are dependent upon each client's current situation (income, tax levels, investment time horizon, and risk tolerance levels). Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent RPCPW from properly servicing the client account, or if the restrictions would require RPCPW to deviate from its standard suite of services, RPCPW reserves the right to end the relationship.

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, and certain other administrative fees. RPCPW does not participate in wrap fee programs.

E. Assets Under Management

RPCPW has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
$ 174,058,420.00	$ 3,919,991.00	December 2020

Item 5: Fees and Compensation

A. Fee Schedule

Portfolio Management Fees (Schwab, Nationwide Variable Annuity and Bright Directions 529 Plan Platforms)

Total Assets Under Management	Annual Fees
$0 - $500,000	1.00%
$500,001 - $1,000,000	0.85%
$1,000,001 - $2,000,000	0.75%
$2,000,001 – And Up	0.50%

Portfolio Management Fees (American Funds F2 Share Class Platform)

Total Assets Under Management	Annual Fees
$0 - $100,000	1.00%
$100,001 – and Up	0.25%

Generally, a lesser fee schedule will be applied to accounts receiving more limited investment advisory services and supervision. Such accounts will generally be held in variable annuity accounts at Nationwide Advisory Services, and/or in the F2 share class record keeping platform at the American Funds mutual fund family. The scope and description of the more limited investment advisory services and the specific fee schedules applied will be negotiated with and agreed to by the client.

The advisory fee is calculated using the value of the assets in the Account on the last business day of the prior billing period for Clients whose assets are custodied at Schwab,

Nationwide, and Bright Directions. For American Funds, the advisory fees are calculated by American Funds using their daily average account value system. RPCPW generally does not calculate the advisory fee for assets on the American Funds F2 share class custodial platform.

These fees are generally not negotiable and the final fee schedule will be memorialized in the client's advisory agreement. Clients may terminate the agreement without penalty for a full refund of RPCPW's fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract immediately upon written notice.

Financial Planning Fees

Fixed Fees

The negotiated fixed rate for creating client financial plans is between $300 and $3,000 depending on the complexity of the task involved and the time needed to perform the work. The fixed fee will be discussed with client and mutually agreed to before work begins.

Clients may terminate the agreement without penalty, for full refund of RPCPW's fees, within five business days of signing the Financial Planning Agreement. Thereafter, clients may terminate the Financial Planning Agreement generally upon written or oral notice, paying only for the services completed.

B. Payment of Fees

Payment of Portfolio Management Fees

Asset-based portfolio management fees are generally withdrawn directly from the client's accounts with client's written authorization on a quarterly basis. Fees are generally paid in advance for accounts where Schwab, Nationwide, or Bright Directions are the custodian. Accounts for which American Funds F2 platform is the custodian, advisory fees are calculated by American Funds in arrears on a daily average asset basis and are paid to RPCPW quarterly at the end of the months of February, May, August, and November.

Payment of Financial Planning Fees

Financial Planning fees are generally paid via check, though with client consent, they may be withdrawn from a client's account.

Fixed financial planning fees are generally paid either in advance or in arrears upon completion of the work as discussed with and agreed to by the client.

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 RPCPW. Please see Item 12 of this brochure regarding broker-dealer/custodian.

D. Prepayment of Fees

RPCPW collects certain fees in advance and certain fees in arrears, as indicated above. Refunds for fees paid in advance but not yet earned will be refunded on a prorated basis and returned within fourteen days to the client via check, or return deposit back into the client's account.

For all asset-based fees paid in advance, the fee refunded will be equal to the balance of the fees collected in advance minus the daily rate* times the number of days elapsed in the billing period up to and including the day of termination. (*The daily rate is calculated by dividing the annual asset-based fee rate by 365.)

E. Outside Compensation For the Sale of Securities to Clients

Neither RPCPW 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

RPCPW 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

RPCPW generally provides advisory services to the following types of clients:

- Individuals
- High-Net-Worth Individuals
- Pension and Profit Sharing Plans

Generally, RPCPW's minimum account size is $200,000. Minimum account requirements may be negotiable under certain circumstances. RPCPW may group certain related client accounts for the purposes of achieving the minimum account size.

Item 8: Methods of Analysis, Investment Strategies, & Risk of Loss

A. Methods of Analysis and Investment Strategies

Methods of Analysis

RPCPW utilizes a fundamental security analysis method.

Fundamental Analysis.

RPCPW attempts to measure the intrinsic value of a security by looking at economic and financial factors (including the overall economy, industry conditions, and the financial condition and management of the company itself) to determine if the company is underpriced (indicating it may be a good time to buy) or overpriced (indicating it may be time to sell).

Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock.

Investment Strategies

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time. Each client executes an Investment Policy Statement that documents their objectives and their desired investment strategy, as appropriate.

Other strategies may include long-term purchases, short-term purchases, trading, short sales, margin transactions, and option writing (including covered options, uncovered options or spreading strategies).

Risk of Loss

Investing in securities involves risk of loss that clients should be prepared to bear. All investment programs have certain risks that are borne by the investor. RPCPW investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- Interest-rate Risk: Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- Market Risk: The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by

external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.

- Inflation Risk: When any type of inflation is present, a dollar next year will not buy as much as a dollar today, because purchasing power is eroding at the rate of inflation.
- Currency Risk: Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- Reinvestment Risk: This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- Business Risk: These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- Liquidity Risk: Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- Financial Risk: Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

Other Investments

RPCPW may offer advice on other investments including mortgages, business entities, equipment leasing, collectibles, hard assets, managed futures and commodities. RPCPW reserves the right to advise clients on any other type of investment that it deems appropriate based on the client's stated goals and objectives. RPCPW may also provide advice on any type of investment held in a client's portfolio at the inception of the advisory relationship or on any investment on which the client requests advice."

B. Material Risks Involved

Methods of Analysis

Modern portfolio theory assumes that investors are risk averse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected

returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio exists with a more favorable risk-expected return profile – i.e., if for that level of risk an alternative portfolio exists which has better expected returns.

Investment Strategies

Long term trading is 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.

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

C. 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.

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 bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance.

Real estate funds (including REITs) face several kinds of risk that are inherent in the real estate sector, which historically has experienced significant fluctuations and cycles in performance. Revenues and cash flows may be adversely affected by: changes in local real estate market conditions due to changes in national or local economic conditions or changes in local property market characteristics; competition from other properties offering the same or similar services; changes in interest rates and in the state of the debt and equity credit markets; the ongoing need for capital improvements; changes in real estate tax rates and other operating expenses; adverse changes in governmental rules and fiscal policies; adverse changes in zoning laws; the impact of present or future environmental legislation and compliance with environmental laws.

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 RPCPW 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 RPCPW 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

Thomas Edward Westrick is an independent licensed insurance agents. From time to time, he 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. RPCPW always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients always have the right to decide

whether or not to utilize the services of any RPCPW representative in such individual's outside capacities.

Thomas E. Westrick is the part owner and managing member of Retirement Programs Co., LLC, (RPC). RPC is primarily involved in the following activities:

- Qualified plan consulting and design services for small business retirement plans
- Life insurance, disability insurance, and long-term care insurance sales and consulting
- Sales and servicing of fixed interest and equity –indexed insurance contracts
- General financial planning, investment education, and investment advice

These individuals receive compensation for performing these services as owners of RPC. Clients of RPC may also be clients of RPCPW. This may be a potential conflict of interest; however, this conflict is discussed and disclosed to clients. Compensation received by RPC is separate and distinct from compensation earned by RPCPW.

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

RPCPW does not utilize nor select third-party investment advisers.

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

A. Code of Ethics

RPCPW has a written Code of Ethics that covers 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. RPCPW's Code of Ethics is available free upon request to any client or prospective client.

B. Recommendations Involving Material Financial Interests

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

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of RPCPW may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of RPCPW 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 to clients. Such transactions may create a conflict of interest. RPCPW will always document any transactions that 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.

D. Trading Securities At/Around the Same Time as Clients' Securities

From time to time, representatives of RPCPW may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of RPCPW to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest; however, RPCPW will never engage in trading that operates to the client's disadvantage if representatives of RPCPW buy or sell securities at or around the same time as clients.

Item 12: Brokerage Practices

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

Custodians/broker-dealers will be recommended based on RPCPW'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 RPCPW 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 RPCPW's research efforts. RPCPW will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian.

RPCPW will require clients to use the following custodians/broker-dealers for clients accounts where RPCPW is providing ongoing investment advisory services

- Schwab Institutional, a division of Charles Schwab & Co., Inc.
- American Funds mutual fund family
- Nationwide Life Insurance Company Advisory Services (variable annuity client assets only)
- Bright Directions of Illinois F share platform (529 education savings accounts only)

1. *Research and Other Soft-Dollar Benefits*

While RPCPW has no formal soft dollars program in which soft dollars are used to pay for third party services, RPCPW may receive research, products, or other services from custodians and broker-dealers in connection with client securities transactions ("soft dollar benefits"). RPCPW 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 that any particular client will benefit from soft dollar research, whether or not the client's transactions paid for it, and RPCPW does not seek to allocate benefits to client accounts proportionate to any soft dollar credits generated by the accounts. RPCPW benefits by not having to produce or pay for the research, products or services, and RPCPW will have an incentive to recommend a broker-dealer based on receiving research or services. Clients should be aware that RPCPW's acceptance of soft dollar benefits may result in higher commissions charged to the client.

2. *Brokerage for Client Referrals*

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

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

RPCPW will require clients to use a specific broker-dealer to execute transactions. Not all advisers require clients to use a particular broker-dealer.

B. Aggregating (Block) Trading for Multiple Client Accounts

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

Item 13: Review of Accounts

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

All client accounts for RPCPW's advisory services provided on an ongoing basis are generally reviewed at least semi-annually by one or more of the firm's investment advisors, Thomas E. Westrick, with regards to clients' portfolio allocations and risk tolerance levels.

All financial planning accounts are reviewed upon financial plan creation but prior to plan delivery. Such reviews are done by Thomas E. Westrick. After presentation and/or

delivery of the plan, there are no further reports. Clients may request additional plans, services, or reports for a mutually agreed upon additional fee.

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).

With respect to financial plans, RPCPW's services will generally conclude upon delivery of the financial plan.

C. Content and Frequency of Regular Reports Provided to Clients

Each client of RPCW receiving advisory services on an ongoing basis will receive a monthly or quarterly report detailing the client's account, including assets held, transactions, asset value, and calculation of fees. This written report will come from the custodian either on paper or via email link as selected by the client. Generally, Schwab provides monthly statements while American Funds, Bright Directions, Nationwide Advisory Services and other custodians provide quarterly statements.

Each financial planning client will receive the financial plan upon completion.

In addition, at least annually, clients receive investment holdings and performance reports prepared using RPCPW's portfolio management system.

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)

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

With respect to Schwab, RPCPW receives access to Schwab's institutional trading and custody services, which are typically not available to Schwab retail investors. These services generally are available to independent investment advisers on an unsolicited basis, at no charge to them so long as a total of at least $10 million of the adviser's clients' assets are maintained in accounts at Schwab Advisor Services. Schwab's services include brokerage services that are related to the execution of securities transactions, custody, research, including that in the form of advice, analyses and reports, and access to mutual funds and other investments that are otherwise generally available only to institutional

investors or would require a significantly higher minimum initial investment. For RPCPW client accounts maintained in its custody, Schwab generally does not charge separately for custody services but is compensated by account holders through commissions or other transaction-related or asset-based fees for securities trades that are executed through Schwab or that settle into Schwab accounts.

Schwab also makes available to RPCPW other products and services that benefit RPCPW but may not benefit its clients' accounts. These benefits may include national, regional or RPCPW specific educational events organized and/or sponsored by Schwab Advisor Services. Other potential benefits may include occasional business entertainment of personnel of RPCPW by Schwab Advisor Services personnel, including meals, invitations to sporting events, including golf tournaments, and other forms of entertainment, some of which may accompany educational opportunities. Other of these products and services assist RPCPW in managing and administering clients' accounts. These include software and other technology (and related technological training) that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts, if applicable), provide research, pricing information and other market data, facilitate payment of RPCPW's fees from its clients' accounts (if applicable), and assist with back-office training and support functions, recordkeeping and client reporting. Many of these services generally may be used to service all or some substantial number of RPCPW's accounts. Schwab Advisor Services also makes available to RPCPW other services intended to help RPCPW manage and further develop its business enterprise. These services may include professional compliance, legal and business consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, employee benefits providers, human capital consultants, insurance and marketing. In addition, Schwab may make available, arrange and/or pay vendors for these types of services rendered to RPCPW by independent third parties. Schwab Advisor Services may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to RPCPW. RPCPW is independently owned and operated and not affiliated with Schwab.

B. Compensation to Non – Advisory Personnel for Client Referrals

RPCPW 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, RPCPW 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.

Custody is also disclosed in Form ADV because RPCPW has authority to transfer money from client account(s), which constitutes a standing letter of authorization (SLOA). Accordingly, RPCPW will follow the safeguards specified by the SEC rather than undergo an annual audit.

Item 16: Investment Discretion

RPCPW provides discretionary investment advisory services to clients. The advisory contract established with each client sets forth the discretionary authority for trading. Where investment discretion has been granted, RPCPW 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.

Item 17: Voting Client Securities (Proxy Voting)

RPCPW 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. Clients may also ask for their advisor's opinion on proxy voting matters, recognizing and accepting that advisor's opinion may not be a fully informed nor expert opinion.

Item 18: Financial Information

A. Balance Sheet

RPCPW 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 RPCPW nor its management has any financial condition that is likely to reasonably impair RPCPW's ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years

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