

# **R. H. HANSFORD & COMPANY, INC.**

**5632 La Gorce Drive  
Miami Beach, FL 33140**

**(305) 868-9200**

**July 29, 2021**

This brochure (“Brochure”) provides information about the qualifications and business practices of R. H. Hansford & Company, Inc., a registered investment adviser. Registration does not imply a certain level of skill or training. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”), or by any state securities authority. R. H. Hansford & Company, Inc.’s IARD firm number is 113060.

If you have any questions about the contents of this brochure, please contact us at: [\(305\) 868-9200](tel:3058689200) or by email at: [April@RHHansford.com](mailto:April@RHHansford.com). Additional information about R. H. Hansford & Company, Inc. is available on the SEC's website at [www.asdvisorinfo.sec.gov](http://www.asdvisorinfo.sec.gov) (click on the link, select “investment adviser firm” and type in our firm name). The results will provide you with both Parts 1 and 2 of our Form ADV.

## **Item 2 - Material Changes**

Since the last updating amendment to R. H. Hansford & Company, Inc.'s, Form ADV Part 2 Brochure on February 6, 2021, we note that this Brochure dated February 24, 2021, is a new document prepared according to the SEC's requirements and rules. As such, this document is materially different in structure and requires certain new information that our previous Brochure did not require. Below are material changes since the last annual updating amendment:

1. We are no longer required to register as a multi-state adviser (i.e., to register in 15 or more states). Therefore, we are filing the application to convert to a state registered adviser, which has been updated throughout this Brochure.
2. Item 5 - Fees are paid in arrears and will not exceed 1.5% for any new clients.
3. Item 14 - We no longer provide compensation for client referrals.
4. Item 18 - The loan received by R. H. Hansford & Company, Inc. under the Payroll Protection Program was officially forgiven and reference to this has been removed from Item 18.

In addition, we made minor clarifications to Item 5 regarding our fee schedule, Item 12 (that we do not use soft dollar benefits to manage client accounts) and to Item 18 as it relates to a loan we received under the Payroll Protection Program. We have also made various clarifications throughout this Brochure.

Pursuant to SEC rules, we will ensure that you receive a summary of any material changes to this and subsequent materials within 120 days of the close of our fiscal year. We may further provide other ongoing disclosure information about material changes, as necessary.

We will further provide you with a new Brochure, as necessary, based on changes or new information, at any time, without charge.

Currently, this Brochure may be requested by contacting R.H. Hansford & Company, Inc. at [\(305\) 868-9200](tel:3058689200) or [April@RHHansford.com](mailto:April@RHHansford.com).

Additional information about R. H. Hansford & Company, Inc. is also available via the

SEC's website: [www.advisorinfo.sec.gov](http://www.advisorinfo.sec.gov). The SEC's website also provides information about any persons affiliated with R. H. Hansford & Company, Inc. who are registered, or are required to be registered, as investment adviser representatives or about R. H. Hansford & Company, Inc.

### **Item 3 - Table of Contents**

Item 1 - Cover Page.....	
Item 2 - Material Changes .....	i
Item 3 - Table of Contents.....	iii
Item 4 - Advisory Business .....	1
Item 5 - Fees and Compensation .....	2
Item 6 - Performance-Based Fees and Side-By-Side Management.....	3
Item 7 - Types of Clients.....	4
Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss .....	4
Item 9 - Disciplinary Information .....	8
Item 10 - Other Financial Industry Activities and Affiliations.....	8
Item 11 - Code of Ethics, Participation or Interest in Client Transactions and Personal Trading .....	9
Item 12 - Brokerage Practices .....	10
Item 13 - Review of Accounts.....	13
Item 14 - Client Referrals and Other Compensation.....	13
Item 15 - Custody .....	13
Item 16 - Investment Discretion.....	14
Item 17 - Voting Client Securities (i.e., Proxy Voting) .....	15
Item 18 - Financial Information .....	15
Item 19 - Requirements for State-Registered Advisers .....	15

#### **Item 4 - Advisory Business**

A. R. H. Hansford & Company, Inc. ("RHH" or "We") is a registered investment adviser located in Miami Beach, Florida and registered with the State of Florida.

RHH was organized as a corporation under the laws of the State of Florida in 1994 and was founded by Rosemary Hoffman Hansford. The company has been in business since 1994.

B. RHH provides discretionary portfolio management for its clients. We invest primarily in no-load mutual funds. However, we do not limit the investment vehicle in which we provide investment advice. Occasionally, we will purchase a loaded fund because of its unique investment objective. Additionally, we may purchase an equity security in the current economic environment to take advantage of its dividend return.

RHH uses sector funds as well as broad based funds in its portfolios. The sector funds may be single industry or single country or geographic area.

C. RHH profiles each prospective client extensively, including a complete financial profile and an analysis of risk tolerance. Each account is managed individually based on the needs and desires of the client. Occasionally, a client will impose a restriction such as a desire not to be exposed to a particular geographical area.

RHH makes use of tools, such as Riskalyze, to help us evaluate holdings in response to volatile economic conditions, rebalance portfolios, and create retirement road maps to ensure that investment objectives are aligned with specific client goals

D. RHH does not participate in any Wrap Fee Programs.

E. Although most accounts are managed on a discretionary basis, some clients occasionally ask that we purchase a particular security for their account. If this occurs, we will request a written directive before executing the transaction.

Clients sometimes ask that we help them select investments from a list provided to them in the 401(k) or 403(b) plans offered by their employers. We provide this service on a non-discretionary basis which client consent will be obtained prior to execution.

As of December 31, 2020, RHH had a total of \$41,946,893.74 under management on a discretionary basis and \$25,060,000.00 under advisement<sup>1</sup> on a purely advisory basis for a total of \$67,006,893.74 in assets.

## **Item 5 - Fees and Compensation**

A. RHH is a fee-based advisor. Fees are negotiable based upon the size and complexity of the account and will not exceed 1.5% of the dollar value of the assets under management for any new clients. The fee is paid quarterly in arrears and is calculated on the value of the account as determined by the custodian as of the close of business on the last day of the quarter.

B. Generally, fees are deducted directly from each account. However, if a client maintains a taxable account as well as a tax preferred account(s) such as an IRA and/or a pension plan, the fees may be aggregated and deducted from the taxable account. Clients will provide written authorization allowing the custodian to debit such account(s) for certain service fees owed to us and remit such fees to us. The authorization will remain valid until we receive a written revocation of the authorization. The custodian will send the client a quarterly statement indicating all amounts disbursed from the account, including the amount of advisory fees paid directly to us. Some accounts are billed separately at the request of the client.

C. In addition to our investment advisory fee, clients will also incur normal expenses and advisory fees imposed by the mutual funds held in the accounts (expense ratios are listed in each fund's annual report).

Also, the account custodian/broker will charge commissions for trading of non-mutual fund assets. Some mutual funds impose fees if they are sold prior to certain holding periods. Short-term trading fees are detailed in each mutual fund's prospectus. We do not receive any compensation from any of the fees described above.

D. Clients may terminate their investment advisory agreement ("IAA") at any time

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<sup>1</sup> "Assets under advisement" represents assets on which we provide consulting services and for which we have neither discretionary authority nor responsibility for arranging or effecting the purchase or sale of recommendations provided to and accepted by the ultimate client. Inclusion of these assets will cause our total assets number in this Brochure to be different from assets under management disclosed in Item 5.F of our Form ADV Part 1A due to specific calculation instructions for Regulatory Assets Under Management.

by giving RHH written notice. If this IAA is terminated prior to the close of a quarter, the final fee will be prorated for the period during which services were provided. The account value upon which the fee is based shall be the value assigned by the custodian at the close of business on the date of termination of the IAA.

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

RHH does not currently offer performance-based fee compensation arrangements; however, we currently have three legacy clients who entered into this type of compensation arrangement in 2003.

A performance-based fee is a fee based on a share of the capital gains on the assets managed for the client. The clients who pay a performance-based fee are "qualified persons," as defined by SEC Rule 205(3). These clients are billed 15% of the profits earned on their accounts on a quarterly basis and do not pay a fee based on the amount of assets under management. If there is no profit earned during the previous quarter, no fee is charged. Each legacy client was advised that this arrangement presents a conflict of interest in that it creates an incentive for us to trade their accounts more aggressively in order to earn profits.

RHH also manages accounts that are not charged a performance-based fee (referred to as "side-by-side" management). As a result of these different compensation arrangements, we have an incentive to favor accounts that pay a performance-based fee over one that does not because such accounts could generate higher compensation. Clients should be aware that this may indirectly influence the way we manage their account.

To address this conflict, we have implemented a compliance program that monitors the clients' investment objectives and risk tolerance to help ensure that clients are invested in assets that reflect their goals and risk tolerance. It should be noted that this fee structure only applies to legacy clients who selected this structure at the opening of their accounts.

## **Item 7 - Types of Clients**

RHH provides investment advice to individuals, high net worth individuals, trusts, estates, UTMA's, IRA and pension plans.

We require a minimum deposit of \$500,000 to open an account with us. Under certain circumstances, we may waive this minimum requirement.

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

A. RHH specializes in building managed portfolios of mutual funds to meet our client's financial needs and risk tolerance. The emphasis is on long-term growth. We do not participate in short-term trading which gives rise to short-term capital gains. This approach also minimizes the chance of incurring short-term trading fees that some fund families charge. The overwhelming majority of funds chosen are no-load funds, so there are no trading costs associated with long-term trades.

B. Each portfolio typically contains broad-based funds, index funds and sector funds. The conservative portfolios contain higher proportions of broad based and index funds as these are the most diversified and less volatile than sector funds. The more aggressive portfolios contain higher proportions of sector funds which tend to be more volatile. Sector funds are chosen using fund mutual research momentum studies as well as economic conditions in the industry or geographic area.

RHH uses Morningstar, financial periodicals, fund family weekly, monthly and quarterly updates as well as webcasts to inform our research. Other factors we consider in choosing mutual funds include historical performance, overall volatility, style box position, industry sector weighting, cash level, foreign exposure, expense ratio, and manager history.

C. Investing in mutual funds and equities involves volatility and risk of loss.

There are inherent risks involved for each investment strategy or method of analysis RHH uses and the type of security RHH recommends. Investing in securities involves risk of loss which clients should be prepared to bear. Depending on the types of securities RHH invests in, clients may face the following investment risks:



**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.

**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.

**Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.

**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.

**Margin and Use of Leverage:** With the client's consent, RHH will open client accounts as margin accounts. Use of margin can magnify the client's risk exposure; therefore, any decisions to use margin should be discussed with the IAR. Separately managed accounts wishing to use margin are required to complete a margin agreement.

**Mutual Funds Risk:** Mutual funds are subject to investment advisory and other expenses, which will be indirectly paid by clients. As a result, the cost of our investment strategies will be higher than the cost of investing directly in mutual funds, as there are two levels of fees. Mutual funds are subject to specific risks, depending on the nature of the fund.

**Growth Style Risks:** Due to their relatively high valuations, growth stocks are typically more volatile than value stocks. Further, growth stocks may not pay dividends or may pay lower dividends than value stocks. This means they depend more on price changes for returns and may be more adversely affected in a down market compared to value stocks that pay higher dividends.

**Value Style Risks:** Investments in value stocks are subject to the risk that their intrinsic values may never be realized by the market, that a stock judged to be undervalued may be appropriately priced, or that their prices may decline, even though in theory they are already undervalued. Value stocks can react differently to issuer, political, market and economic developments than the market as a whole and other types of stocks (e.g., growth stocks).

**Company Size Risks:** Generally, the smaller the market capitalization of a company, the fewer the number of shares traded daily, the less liquid its stock and the more volatile its price. Companies with smaller market capitalizations also tend to have unproven track records, capital. These factors also increase risks and make these companies more likely to fail than companies with larger market capitalizations.

**Foreign Investing Risks:** Investments in foreign companies and markets carry several economic, financial and political considerations that are not associated with the U.S. markets and that could unfavorably affect account performance. Among those risks are greater price volatility; weak supervision and regulation of securities exchanges, brokers and issuers; higher brokerage costs; fluctuations in foreign currency exchange rates and related conversion costs; adverse tax consequences; and settlement delays.

**Fixed Income Securities:** Client accounts with all or a portion of the underlying assets invested in fixed income securities and/or fixed income based mutual funds are subject to the following risks:

**Interest Rate Risks:** Prices of fixed income securities rise and fall in response to changes in the interest rate paid by similar securities. Generally, when interest rates rise, prices of fixed income securities fall. Interest rate changes have a greater effect on the price of fixed income securities with longer maturities.

**Credit Risks:** Credit risk is the possibility that an issuer or counterparty will default on a security or repurchase agreement by failing to pay interest or principal when due. If an issuer defaults, the value of a fixed income security may decrease and a fund holding securities of that issuer may lose money. Lower credit ratings correspond to higher credit risk. Bonds rated BBB or Baa have speculative characteristics.

**Call Risks:** If the fixed income securities in which a fund invests are redeemed by the issuer before maturity (or “called”), the fund may have to reinvest the

proceeds in securities that pay a lower interest rate, which may decrease the portfolio's overall yield. This will most likely happen when interest rates are declining.

**Liquidity Risks:** Liquidity risk refers to the possibility that an investor may not be able to sell or buy a security or close out an investment contract at a favorable price or time. Consequently, an investor, including a fund invested in fixed income securities, may have to accept a lower price to sell a security, sell other securities to raise cash or give up an investment opportunity, any of which could have a negative effect on investment performance. Infrequent trading of securities also may lead to an increase in their price volatility.

**Government Obligations Risks:** No assurance can be given that the United States government will provide financial support to United States government-sponsored agencies or instrumentalities where it is not obligated to do so by law. As a result, there is risk that these entities will default on a financial obligation.

**High Yield Securities Risks:** High yield securities tend to be more sensitive to economic conditions than are higher-rated securities and generally involve more credit risk than securities in the higher-rated categories. The risk of loss due to default by an issuer of high yield securities is significantly greater than issuers of higher-rated securities because such securities are generally unsecured and are often subordinated to other creditors. A fund may have difficulty disposing of certain high yield securities because there may be a thin trading market for such securities. Therefore, RHH does not typically recommend that clients invest in high yield securities.

The above list of risk factors does not purport to be a complete list or explanation of the risks involved in an investment strategy. Clients are encouraged to consult the IAR and tax professional on an initial and continuous basis in connection with selecting and engaging in the services provided by us. In addition, due to the dynamic nature of investments and markets, strategies may be subject to additional and different risk factors not discussed above.

## **Item 9 - Disciplinary Information**

9.A, 9.B, and 9.C

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of RHH or the integrity of our management. RHH and the management team have no legal or disciplinary events to report.

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

Except as disclosed below, neither RHH nor any of our management persons are registered, nor do we have an application pending to register as a futures commission merchant, commodity pool operator, commodity trading advisor or an associated person of the foregoing entities.

In addition, neither RHH nor any of our management persons have any arrangement that is material to our advisory business or to our clients that we or any of our management persons have with any related person that is under common control and ownership, i.e., a:

- Broker-dealer, municipal securities dealer, or government securities dealer or broker,
- Investment company or other pooled investment vehicle,
- Other investment adviser or financial planner,
- Futures commission merchant (or commodity pool operator or commodity trading advisor),
- Banking or thrift institution,
- Accountant or accounting firm,
- Lawyer or law firm,
- Insurance company or agency,
- Pension consultant,
- Real estate broker or dealer, or
- Sponsor or syndicator of limited partnerships.

RHH does not recommend or select other investment advisers for our clients nor do we have business relationships with other advisers.

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

A. RHH has adopted a Code of Ethics that describes the high standards of business conduct expected of all members of the firm and describes its fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, prohibition on insider trading, prohibition on rumor mongering, restrictions on the acceptance of gifts of a material value, reporting of certain gifts and business entertainment items, and personal securities trade reporting, among other things. Our supervised persons must acknowledge receipt of the Code of Ethics annually, or as amended. To assist in carrying out our fiduciary duties to clients, we have implemented the following controls:

- RHH recognizes the right of a client to specify investment objectives, guidelines and/or conditions for the overall management of their portfolio(s). Our supervised persons and members of their immediate families may not buy or sell securities for their personal account(s) if their decision is derived in whole or in part from their personal employment with RHH, unless the information is publicly available.
- No member of the firm will put their own interests ahead of any client. This means they may not purchase or sell individual securities being considered for, or being held by client accounts, without preclearance of our Chief Compliance Officer.
- Our supervised persons may not participate in private placements or initial public offerings (IPOs) without preclearance of our Chief Compliance Officer.
- The firm requires that our supervised persons must comply with applicable federal and state regulations governing registered investment advisory practices.
- Records will be maintained of all non-exempt securities bought or sold by RHH's access persons. RHH's Chief Compliance Officer will review these records on a regular basis.

- RHH maintains and enforces written policies and procedures that are reasonably designed to prevent the misuse of material non-public information that is available to any person associated with RHH.

Our clients or prospective clients may request a copy of the firm's Code of Ethics by contacting our Chief Compliance Officer, April M. Murphy at (305) 868-9200 or [april@rhhansford.com](mailto:april@rhhansford.com).

B. RHH's supervised persons do not recommend, buy or sell any securities in which they have a material financial interest for their clients' accounts.

C. RHH's supervised persons may invest in the same mutual funds that they recommend, buy and sell for their clients' accounts. This practice does not present a conflict of interest due to the nature of open-end mutual funds.

D. RHH's supervised persons may buy and sell mutual funds for their clients' accounts and their own accounts at the same time. This does not create a conflict of interest because all orders are traded for the same closing NAV price on the day of the trade execution. All parties will receive the same execution pricing on these transactions.

When purchasing individual securities for clients (other than open-end mutual funds), all client orders must be executed prior to any purchase for any supervised person and their family members. Similarly, when selling individual securities for clients (other than open-end mutual funds), all client orders must be executed prior to any sale for any supervised person and their family members.

RHH does not execute transactions on a principal or agency cross basis.

## **Item 12 - Brokerage Practices**

A. RHH does not take custody of any client funds or securities. Client accounts are established primarily with Fidelity Institutional Wealth Services ("FIWS") through Fidelity Brokerage Services ("FBS"), an unaffiliated service provider. In recommending FBS, we consider their financial strength, reputation, execution, pricing, reporting, research, and service. However, clients are free to choose other custodians.

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

- a. RHH receives research, webcasts and execution-related services from FIWS or FBS to assist us in managing accounts. The services and products include financial publications, pricing information, periodic phone conferences on market topics, and periodic seminars. We also receive webcasts, financial publications, pricing information and phone conferences from the mutual fund companies whose products we purchase for our clients. Such research and execution-related services are offered to all investment advisers who utilize these firms.
- b. The brokerage commissions charged by FBS or other custodians who maintain our clients' accounts may be higher (on non-open-ended mutual funds) than those charged by a broker dealer who does not provide the services mentioned above.
- c. Since RHH primarily holds no-load mutual funds in clients' portfolios, our clients do not pay commissions higher than those charged by other broker dealers in return for soft dollar benefits.
- d. RHH does not have any formal soft dollar arrangements. FIWS, FBS, and mutual fund families provide us with investment research products and services regardless of trading volume. Such products and services are used to service all our clients.

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

RHH does not receive client referrals from FIWS, FBS, or any other custodian holding our clients' assets. RHH does not consider obtaining referrals as criteria in its recommendation of a broker dealer.

## **3. Directed Brokerage**

RHH does not have directed brokerage arrangements.

## **4. Trade Aggregation**

As a matter of general practice, RHH does not aggregate trades unless we are making a change to our model account holdings, which would impact all accounts. It is our policy to provide individual advice to each of our clients.

We review each client's portfolio individually. Orders are placed in clients' accounts separately as the IAR deems appropriate given the market conditions. This could result in situations where we do not aggregate trades across multiple accounts trading in the same security. Clients may pay or receive a higher price than they would have if we aggregated trades. However, where possible and when advantageous to clients (typically when we determine a change to our model accounts is necessary), we will block trades.

Block trading permits the transaction costs to be shared equally on a pro-rated basis between all accounts included in the block trade. Block trading allows us to execute trades in a more timely, equitable and efficient manner, and to seek to reduce overall commission charges to the clients. In both cases, whether trades are aggregated or not, we have developed and implemented a Compliance Program to monitor our trading to ensure that all client accounts receive fair and equitable treatment.

## **5. Administrative Trade Errors**

From time-to-time, RHH may make an error in submitting a trade order on the clients' behalf. Trading errors may include a number of situations, such as:

- The wrong security is bought or sold for a client,
- A security is bought instead of sold,
- A transaction is executed for the wrong account,
- Securities transactions are completed for a client that had a restriction on such security, or
- Securities are allocated to the wrong accounts.

When this occurs, we may place a correcting trade with the broker-dealer that has custody of the client's account. If an investment gain results from the corrective action, the gain will remain in the client's account unless it is legally not permissible for the client to retain the gain, or RHH confers with the client and the client decides to forego the gain (e.g., due to tax reasons). If a loss occurs due to our administrative trade error, we are responsible and will pay for the loss to ensure that the client is made whole.

Note: To limit the respective administrative expenses and burden of processing small trade errors, it should be noted some custodians (at their own discretion) may elect not to invoice RHH if the trade error involves a de minimis dollar amount (usually less than \$100). Generally, if related trade errors result in both gains and losses in the client's



account, they may be netted.

### **Item 13 - Review of Accounts**

A. April Murphy, our CCO will review all client accounts at least monthly. The current investment strategy will be reviewed annually with each client and revisions will be made as needed based upon a client's changing circumstances. We are always available to discuss these changes with clients via telephone, email, or written correspondence.

B. More frequent reviews occur when requested by the client or suggested by April Murphy. Such reviews may be prompted by factors such as the general economy, market conditions, or changes in client circumstances.

All clients are asked to provide access to their accountants. As a matter of policy, we contact accountants during the last quarter of each year to discuss tax ramifications of year-end buying and selling in all taxable accounts.

Clients will receive statements for their accounts, at least quarterly, reflecting the account values, positions, and activities from the custodian.

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

RHH does not provide compensation to any individuals or entities for client referrals. Additionally, RHH does not receive compensation for client referrals.

### **Item 15 - Custody**

RHH does not take physical possession of client funds or securities. However, given that some clients may grant us authority to deduct the advisory fees from their accounts, we are deemed to have custody.

We will comply with custody safekeeping requirements by obtaining prior written authorization from clients to deduct advisory fees from their account(s) held by a

qualified custodian. Each time a fee is directly deducted from a client's account, concurrently we will send the qualified custodian notice of the amount of the fee to be deducted from the client's account and send the client an invoice itemizing the fee, including the formula used to calculate the fee, the amount of assets under management upon which the fee is based, and the time period covered by the fee. The custodian will send to the client, at least quarterly, an account statement identifying the amount of funds and each security in the account at the end of the period, and setting forth all transactions in the account during that period, including the amount of advisory fees paid directly to us. For clients whose accounts are held at Fidelity, the statements are monthly.

Clients also receive trade confirmations, year-end statements, and, where applicable, tax reporting statements from the custodian. You should carefully review the statements received from the custodians upon receipt and inform us of any discrepancy.

#### **Item 16 - Investment Discretion**

RHH receives discretionary authority from each client upon execution of the client agreement. This discretion grants us the authority to select the identity and amount of securities to be bought or sold. Such discretion will be exercised in a manner consistent with the stated investment objectives for the client's account.

When selecting securities and determining amounts, we observe the client's investment policies, limitations and restrictions.

In the case of 401(k) and 403(b) accounts provided by a client's employer, RHH does not take discretion. Rather, clients provide their most recent statements and a listing of available fund choices to us. We make recommendations and clients execute their own trades. Often clients who have discretionary accounts with us request that their other accounts be reviewed on a quarterly basis.

In managing a client's investment portfolio, RHH acts in a manner in keeping with what we understand and believe to be in the client's best interest. In making buy and sell decisions, we follow general guidelines established by the client which may include instructions to have us refrain from purchasing certain securities. Any restrictions must be submitted to us in writing.

### **Item 17 - Voting Client Securities (i.e., Proxy Voting)**

As a matter of firm policy and practice, RHH does not vote proxies on behalf of clients. Clients receive proxy material directly from their account custodian by either email or U.S. mail. Clients retain the responsibility for receiving and voting proxies. We may, if asked, provide advice to clients regarding their voting of proxies. Clients may address questions concerning a proxy matter to RHH personnel by contacting us at our principal place of business or by the phone listed on the cover page of this Brochure.

From time to time, securities held in a client's portfolio may be the subject of class action litigation. The decision regarding whether to file a proof of claim in a class action settlement is a question involving legal judgment. RHH does not instruct or give advice to the client on whether or not to participate as a member of class action lawsuits. We will not automatically file claims on the client's behalf. If the client requests assistance, we will provide any transaction information pertaining to the client's account that may be helpful and/or needed in order for the client or the client's custodian to file a proof of claim in a class action.

### **Item 18 - Financial Information**

RHH is not required to provide financial information in this Brochure because:

- We do not require the prepayment of more than \$500 in fees when services cannot be rendered within 6 months.
- We do not take custody of client funds or securities.
- We do not have a financial condition or commitment that impairs our ability to meet contractual and fiduciary obligations to clients.

Additionally, RHH has never been the subject of a bankruptcy proceeding.

### **Item 19 - Requirements for State-Registered Advisers**

A & B. Each of our principal executive officers and management persons,

currently only April M. Murphy (CRD #6762770), will provide their formal education and business background including any business in which they are actively engaged (other than giving investment advice) and the approximate amount of time spent on that business in a separate disclosure, the Form ADV Part 2B Supplement.

C. Performance-based fees is described in Item 6 above.

D. RHH does not, nor any of our management persons, have material facts regarding any legal, financial or other “disciplinary” item to report.

E. RHH does not, or any of our management persons, have any relationship or arrangement with any issuer of securities that is not listed in Item 10 of this Brochure.