

Redwood Coast Financial Partners Wrap Fee Program Brochure

This brochure provides information about the qualifications and business practices of Redwood Coast Financial Partners. If you have any questions about the contents of this brochure, please contact us at (707) 444-9212 or by email at: nbertell@redwoodadvisor.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 Redwood Coast Financial Partners is also available on the SEC's website at www.adviserinfo.sec.gov. Partners' CRD number is: 226560.

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Registration 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 to this Wrap Fee Program Brochure on 03/14/2021 are described below. Material changes relate to Redwood Coast Financial Partners's policies, practices or conflicts of interests only.

- Redwood Coast Financial Partners has transitioned to registration with the United States Securities and Exchange Commission from its prior registration at the state level.
- Redwood Coast Financial Partners has updated Account Requirements and Types of Clients.
- Redwood Coast Financial Partners has updated Risks of Specific Securities Utilized.
- Redwood Coast Financial Partners has updated Voting Client Proxies.
- Redwood Coast Financial Partners has updated Registration Relationships Material to this Advisory Business and Possible Conflicts of Interest.

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Item 4: Services Fees and Compensation

Redwood Coast Financial Partners (hereinafter "RCFP") offers the following services to advisory clients:

A. Description of Services

RCFP participates in and sponsors a wrap fee program, which allows RCFP to manage client accounts for a single fee that includes both portfolio management services and brokerage costs. The fee schedule is set forth below:

Total Assets Under Management	Annual Fee
\$0 - \$250,000	2.00%
\$250,001 - \$1,000,000	1.50%
\$1,000,001 - And Up	1.00%

These fees are negotiable depending upon the needs of the client and complexity of the situation and the final fee schedule is attached as Exhibit II of the client contract. RCFP uses the last day of previous quarter for purposes of determining the market value of the assets upon which the advisory fee is based. Lower fees for comparable services may be available from other sources.

Advisory fees are withdrawn directly from the client's accounts with client written authorization. Fees are paid quarterly in advance. Refunds are given on a prorated basis, based on the number of days remaining in the billing period on the effective date of termination. The fee refunded will be the balance of the fees collected in advance minus the daily rate* times the number of days in the billing period up to and including the effective date of termination. (*The daily rate is calculated by dividing the annual fee by 365).

Clients may terminate the contract without penalty, for full refund, within five business days of signing the contract. Thereafter, clients may terminate the contract immediately upon written notice.

B. Contribution Cost Factors

The program may cost the client more or less than purchasing such services separately. There are several factors that bear upon the relative cost of the program, including the trading activity in the client's account, the adviser's ability to aggregate trades, and the cost of the services if provided separately (which in turn depends on the prices and specific services offered by different providers).

C. Additional Fees

Clients who participate in the wrap fee program will not have to pay for transaction or trading fees.

D. Compensation of Client Participation

Neither RCFP, nor any representatives of RCFP receive any additional compensation beyond advisory fees for the participation of client's in the wrap fee program. However, compensation received may be more than what would have been received if client paid separately for investment advice, brokerage, and other services. Therefore, RCFP may have a financial incentive to recommend the wrap fee program to clients.

Item 5: Account Requirements and Types of Clients

RCFP generally provides its wrap fee program services to the following types of clients:

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

Minimum Account Size

There is no account minimum for any of RCFP's services.

Item 6: Portfolio Manager Selection and Evaluation

A. Selecting/Reviewing Portfolio Managers

RCFP will not select any outside portfolio managers for management of this wrap fee program. RCFP will be the sole portfolio manager for this wrap fee program.

1. Standards Used to Calculate Portfolio Manager Performance

RCFP will use industry standards to calculate portfolio manager performance.

2. Review of Performance Information

RCFP reviews the performance information to determine and verify its accuracy and compliance with presentation standards. The performance information is reviewed quarterly and is reviewed by RCFP.

B. Related Persons

RCFP will act as the portfolio manager for the wrap fee program as described in this brochure. As such, there are no conflicts of interest with related persons and RCFP will not select any related persons as portfolio managers for this wrap fee program.

C. Advisory Business

RCFP offers portfolio management services to its wrap fee program participants as discussed in Section 4 above.

Wrap Fee Portfolio Management

RCFP offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. RCFP creates an Investment Policy Statement for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels) and then constructs a plan (the Investment Policy Statement) to aid in the selection of a portfolio that matches each client's specific situation. Investment Supervisory Services include, but are not limited to, the following:

- Investment strategy
- Asset allocation
- Risk tolerance
- Personal investment policy
- Asset selection
- Regular portfolio monitoring

RCFP evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

Financial Planning

RCFP provides financial planning services to clients who participate in the wrap fee program at no additional charge. 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.

Subscription Services

RCFP provides the Redwood Coast Financial Newsletter to clients who participate in the wrap fee program at no additional charge. These services include a monthly newsletter that will offer information on the latest news in the financial management world. Newsletters will be provided via electronic mail and may be cancelled by giving 30 days written notice.

Performance-Based Fees and Side-By-Side Management

RCFP 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.

Services Limited to Specific Types of Investments

RCFP generally limits its investment advice to mutual funds, ETFs (including ETFs in the gold and precious metal sectors), equities, fixed income/ debt securities and options. RCFP may use other securities as well to help diversify a portfolio when applicable.

Client Tailored Services and Client Imposed Restrictions

RCFP offers the same suite of services to all of its clients. However, specific client financial plans and their implementation are dependent upon the client Investment Policy Statement which outlines each client's current situation (income, tax levels, and risk tolerance levels) and is used to construct a client specific plan to aid in the selection of a portfolio that matches restrictions, needs, and targets.

Clients may not impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs.

Wrap Fee Programs

RCFP sponsors and acts as portfolio manager for this wrap fee program. RCFP manages the investments in the wrap fee program, but does not manage those wrap fee accounts any differently than non-wrap fee accounts. The fees paid to the wrap account program will be given to RCFP as a management fee.

Amounts Under Management

RCFP has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$0.00	\$126,300,000	December 2020

Methods of Analysis and Investment Strategies

RCFP's methods of analysis include modern portfolio theory.

Modern portfolio theory is a theory of investment which attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, by carefully choosing the proportions of various assets.

RCFP uses long term trading.

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

Material Risks Involved

Modern Portfolio Theory assumes that investors are risk adverse, 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.

Long term trading is designed to capture market rates of both return and risk. Frequent trading, when done, can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

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

Risks of Specific Securities Utilized

RCFP generally seeks investment strategies that do not involve significant or unusual risk beyond that of the general domestic and/or international equity markets. The investment types listed below (leaving aside Treasury Inflation Protected/Inflation Linked Bonds) 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. They can be of bond “fixed income” nature (lower risk) or stock “equity” nature (mentioned above).

Equity investment generally refers to buying shares of stocks by an individual or firms in return for receiving a future payment of dividends and capital gains if the value of the stock increases. There is an innate risk involved when purchasing a stock that it may decrease in value and the investment may incur a loss.

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. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed “electronic shares” not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other

precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors.

Fixed income investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This includes corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best known type of fixed income security. In general the fixed income market is volatile, and fixed income securities carry significant interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting, but these bonds still carry a risk of losing share price value. Risks of investing in foreign fixed income securities also include the general risks inherent in non-U.S. investing.

Debt securities carry risks such as the possibility of default on the principal, fluctuation in interest rates, and counterparties being unable to meet obligations.

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 other 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.

Options writing involves a contract to purchase a security at a given price, not necessarily at market value, depending on the market. This strategy includes the risk that an option may expire out of the money resulting in minimal or no value and the possibility of leveraged loss of trading capital due to the leveraged nature of stock options. An uncovered option is a type of options contract that is not backed by an offsetting position that would help mitigate risk. The risk for a “naked” or uncovered put is not unlimited, whereas the potential loss for an uncovered call option is limitless. Spread option positions entail buying and selling multiple options on the same underlying security, but with different strike prices or expiration dates, which helps limit the risk of other option trading strategies. Option writing also involves risks including but not limited to economic risk, market risk, sector risk, idiosyncratic risk, political/regulatory risk, inflation (purchasing power) risk and interest rate risk.

Past performance is not a guarantee of future returns. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Voting Client Proxies

RCFP will accept voting authority for client securities in certain cases. When RCFP does accept voting authority for client securities, it will always seek to vote in the best interests of its clients. RCFP does not maintain preapproved voting guidelines but relies on the investment committee to determine the appropriate course of action in voting client

securities that is in the best interest of the client. Clients may direct RCFP on how to vote client securities by communicating their wishes in writing or electronically to RCFP. When voting client proxies the investment committee will always hold the interests of the clients above its own interests. Clients of RCFP may obtain the voting record of RCFP on client securities by contacting RCFP at phone number or e-mail address listed on the cover page of this brochure. Clients may obtain a copy of RCFP's proxy voting policies and procedures upon request.

Item 7: Client Information Provided to Portfolio Managers

RCFP is the portfolio managers for this wrap fee program. All client information that is collected, including basic information, risk tolerance, sophistication level, and income level will be collected by RCFP. As that information changes and is updated, RCFP will have immediate access to that information once collected.

Item 8: Client Contact with Portfolio Managers

RCFP places no restrictions on client ability to contact its portfolio managers. RCFP's representative, Nicholas Wesley Bertell can be contacted during regular business hours and contact information is on the cover page of Nicholas Wesley Bertell's Form ADV Part 2B brochure supplement.

Item 9: Additional Information

A. Disciplinary Action and Other Financial Industry Activities

Criminal or Civil Actions

There are no criminal or civil actions to report.

Administrative Proceedings

There are no administrative proceedings to report.

Self-regulatory Organization Proceedings

In February 2014 a client complaint was initiated against Nicholas Bertell seeking \$50,000.00 in damages based on allegations that he made an unsuitable investment. The matter is no longer pending, as it settled in August 2014 wherein Summit Brokerage Services, Inc. paid \$20,000.00 of which Mr. Bertell did not contribute to the settlement.

Registration as a Broker/Dealer or Broker/Dealer Representative

Neither RCFP nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither RCFP nor its representatives are registered as or have pending applications to become a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor.

Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

Nicholas Wesley Bertell is an independent licensed insurance agent, and from time to time, 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. RCFP always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients are in no way required to utilize the services of any representative of RCFP in connection with such individual's activities outside of RCFP.

All material conflicts of interest under California Code of Regulations Section 260.238(k) are disclosed regarding the investment adviser, its representatives or any of its employees, which could be reasonably expected to impair the rendering of unbiased and objective advice.

Selection of Other Advisors or Managers and How This Adviser is Compensated for Those Selections

RCFP does not utilize nor select other advisors or third party managers. All assets are managed by RCFP management.

B. Code of Ethics, Client Referrals, and Financial Information

Code of Ethics

RCFP 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. RCFP's Code of Ethics is available free upon request to any client or prospective client.

Recommendations Involving Material Financial Interests

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

Investing Personal Money in the Same Securities as Clients

From time to time, representatives of RCFP may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of RCFP 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. RCFP 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.

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

From time to time, representatives of RCFP may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of RCFP 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, RCFP will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

All client accounts for RCFP's advisory services provided on an ongoing basis are reviewed at least monthly by Nicholas W Bertell, President with regard to clients' respective investment policies and risk tolerance levels. All accounts at RCFP are assigned to this reviewer.

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).

Content and Frequency of Regular Reports Provided to Clients

Each client will receive at least quarterly from the custodian, a written report that details the client's account including assets held and asset value which will come from the custodian.

Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

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

Compensation to Non – Advisory Personnel for Client Referrals

RCFP does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

Balance Sheet

RCFP does not require nor solicit prepayment of more than \$1,200 in fees per client, six months or more in advance and therefore does not need to include a balance sheet with this brochure.

Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither RCFP nor its management have any financial conditions that are likely to reasonably impair our ability to meet contractual commitments to clients.

Bankruptcy Petitions in Previous Ten Years

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