



RICHMOND CAPITAL MANAGEMENT
Experience, Knowledge, Service

Richmond Capital Management, Inc.

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Contact Information

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Chief Compliance Officer

**Part 2A of Form ADV
Firm Brochure
Summary of Material Changes**

March 23, 2023

This brochure provides information about the qualifications and business practices of Richmond Capital Management. If you have any questions about the contents of this brochure, please contact us at (804) 379-8280 and/or services@richmondcap.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Additional information about Richmond Capital Management is available on the SEC's website at www.adviserinfo.sec.gov. Our CRD number is 104636. Richmond Capital Management is a "registered investment adviser." Registration does not imply a certain level of skill or training.

Material Changes

Below is a summary list of material changes to Part 2A of Form ADV (Firm Brochure) dated March 30, 2021. You may obtain a copy of the new brochure by contacting Howard Bos, President at (804) 379-8283 or hbos@richmondcap.com, or Elizabeth Harris, Managing Director, Client Services at (804) 379-8282 or eharris@richmondcap.com.

Item 2 (Fees and Compensation)

- The above fees are subject to negotiation. Some clients have different breakpoints than the fee schedule above but in no instance is the total fee greater than the fee schedule noted above. The firm may offer reduced fees for eleemosynary institutions or mandates utilizing passive management, among other considerations. Additionally, fees may be reduced based on a client's total amount of assets under management. The firm charges performance-based fees on our RCM Construction MBS Opportunities Fund, L.P.

Item 3 (Performance-Based Fees and Side-By-Side Management)

- Richmond Capital Management does offer fee arrangements where the firm is paid an additional incentive fee for outperforming performance standards only on our RCM Construction MBS Opportunities Fund, L.P. In limited instances the firm has fee arrangements where a penalty in the form of a lowered fee is charged when contractual performance standards are not achieved.

Item 8 (Code of Ethics, Participation or Interest in Client Transactions and Personal Trading)

- Richmond Capital Management may invest client's money into electronically traded funds ("ETFs"). These ETFs charge a fee in addition to the management fee we charge on our client's accounts.