



RICHMOND CAPITAL  
MANAGEMENT

## Client Relationship Summary, March 2021

### Introduction

Richmond Capital Management is an independent investment adviser registered with the Securities and Exchange Commission. We provide investment advisory services to retail investors, trusts, estates, foundations, charitable organizations, corporations and pension and profit-sharing plans. This document gives you a summary of the types of services we provide and how you pay. There are different ways you can get help with your investments. You should carefully consider which types of accounts and services are right for you. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://Investor.gov/CRS).

### Relationships and Services

#### *What investment services and advice can you provide me?*

- As part of our standard service, we offer you investment services on a regular basis and monitor your account on a daily basis. We will discuss your investment goals and design, with you, a strategy to achieve these goals. We will provide you with investment detail at least quarterly and are available to discuss your portfolio when needed.
- You can choose an account that allows us to buy and sell investments in your account without asking you in advance (a “discretionary account”) or we can give you advice and you decide what investments to buy and sell (a “non-discretionary account”).
- Our investment advice will cover a limited selection of investments. Other firms could provide advice on a wider range of choices, some of which might have lower costs.

#### **Ask your financial professional:**

1. *Given my financial situation, should I choose an investment advisory service? Why or why not?*
2. *How will you choose investments to recommend to me?*
3. *What is your relevant experience, including licenses, education, and other qualifications? What do these qualifications mean?*

### Fees, Costs, Conflicts and Standards of Conduct

#### *What fees will I pay?*

- If you open an advisory account, you will pay an on-going asset-based fee at the end of each quarter for our services. This fee is based on the value of the cash and investments in your advisory account. The amount paid to our firm generally does not vary based on the type of investments we select on your behalf. The asset-based fee reduces the value of your account and will be deducted from your account.
- Our minimum requirement for new accounts is \$7 million except for our closed-end fund strategies which is \$250,000.

- Some investments (such as closed-end mutual funds and exchange traded funds) impose additional fees that will reduce the value of your investment over time.
- Our fees can vary and are negotiable. The amount you pay will depend, for example, on the services you receive and the amount of assets in your account.
- You may pay a transaction fee when we buy and sell an investment for you. You will also pay fees to a broker-dealer or bank that will hold your assets (called “custody”).
- The more assets you have in the advisory account, including cash, the more you will pay us. We therefore have an incentive to increase the assets in your account in order to increase our fees. You pay our fee quarterly even if no trades are done in the account.

*You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.*

**Ask your financial professional:**

1. *Help me understand how these fees and costs might affect my investments?*
2. *Do the math for me. How much would I pay per year for an advisory account? What would make those fees more or less? What services will I receive for those fees?*

***What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?***

“*When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice, we provide you. Here are some examples to help you understand what this means.*”

- I. Clients may have different fee schedules. The firm may offer different clients different fee schedules based on portfolio size, eleemosynary status, or other factors. The firm affirms that all clients are treated equally in the portfolio management and client reporting process, and any other responsibility the firm has to a client.
- II. The firm may invest in securities of investment advisory clients for other clients' portfolios. Potential conflicts regarding investing in an individual client's fixed income securities are mitigated by the firm's procedures for approving new corporate bond investments. All investments for our clients must be approved by the investment committee and meet quality, maturity, valuation, and (if applicable) social restriction criteria. Should a security meet those criteria, they may be added to our clients' portfolio.
- III. Employees of the firm may have a financial interest in and trade in securities and investment products that the firm also recommends to its advisory clients. The firm maintains a Personal Securities Trading Policy which states that transactions for the firm's clients have priority over transactions in securities by firm employees. Any security transaction an employee makes must not involve a limited opportunity that the firm could utilize and take advantage of for its clients.

Refer to our Form ADV Part 2A section titled **Code of Ethics, Participation or Interest in Client Transactions and Personal Trading** to help you understand what conflicts exist.

**Ask your financial professional:**

*How might your conflicts of interest affect me, and how will you address them?*

## ***How do your financial professionals make money?***

Our financial professionals are compensated based on the revenue the firm earns from the financial professional's advisory services and recommendations. Products may have different fee schedules. RCM may recommend products that have higher fee schedules than other products.

### **Disciplinary History**

## ***Do you or your financial professionals have legal or disciplinary history? No***

Richmond Capital Management and its employees have not been subject to any legal or disciplinary events.

Search Tool - visit [Investor.gov/CRS](http://Investor.gov/CRS) for a free and simple search tool to research you and your financial professionals.

### **Ask your financial professional:**

1. *As a financial professional do you have any disciplinary history?*
2. *For what type of conduct?*

### **Additional Information**

## ***We encourage you to seek additional information.***

For additional information on our advisory services, see our Form ADV brochure on IARD on [Investor.gov](http://Investor.gov) and any brochure supplement your financial professional provides.

To report a problem to the SEC, visit [Investor.gov](http://Investor.gov) or call the SEC's toll-free investor assistance line at (800) 732-0330. If you have a problem with your investments, account or financial professional, contact us in writing at Richmond Capital Management 10800 Midlothian Turnpike, Suite 217, Richmond, VA 23235.

### **Ask your financial professional:**

1. *Who is my primary contact person?*
2. *Is he or she a representative of an investment adviser or a broker-dealer?*
3. *Who else can I talk to about my portfolio(s)?*