# RCA Wealth Strategies LLC Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of RCA Wealth Strategies LLC. If you have any questions about the contents of this brochure, please contact us at (785) 226-6139 or by email at: <a href="mailto:jchamplin@rcawealthstrategies.com">jchamplin@rcawealthstrategies.com</a>. 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 RCA Wealth Strategies LLC is also available on the SEC's website at <a href="https://www.adviserinfo.sec.gov">www.adviserinfo.sec.gov</a>. RCA Wealth Strategies LLC's CRD number is: 315915.

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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 RCA Wealth Strategies LLC on February 15, 2022 are described below. Material changes relate to RCA Wealth Strategies LLC's policies, practices or conflicts of interests.

- RCA may refer its advisory clients to DPL Financial Partners, a third-party platform provider of insurance consultation services. (Item 4)
- RCA utilizes Altruist Financial, LLC as a custodian. (Item 12)
- RCA utilizes Altruist Financial, LLC as a third-party money manager. (Item 5)
- RCA utilizes Gradient Investments as a third-party money manager. (Item 5)
- RCA has updated Altruist Financial's third-party management fee. (Item 5)

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## **Item 4: Advisory Business**

#### A. Description of the Advisory Firm

RCA Wealth Strategies LLC (hereinafter "RCA") is a Limited Liability Company organized in the State of Kansas. The firm was formed in January 2013, and the principal owners are Michael Rood and Jace Champlin.

#### **B.** Types of Advisory Services

#### Portfolio Management Services

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

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

RCA evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. RCA will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction; however, it will also provide non-discretionary portfolio management at the client's election.

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

#### 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.

In certain circumstances and when appropriate, RCA may refer its advisory clients to DPL Financial Partners, a third-party platform provider of insurance consultation services. RCA does not receive any compensation, direct or indirect, for this referral.

#### 401k Investment Management

RCA offers 401k Investment Management services. 401k Investment Management may include, but is not limited to:

- identifying investment objectives and restrictions
- providing guidance on various assets classes and investment options
- recommending money managers to manage plan assets in ways designed to achieve objectives
- monitoring performance of money managers and investment options and making recommendations for changes
- recommending other service providers, such as custodians, administrators, and broker-dealers
- creating a written 401k Investment Management plan

These services are based on the goals, objectives, demographics, time horizon, and/or risk tolerance of the plan and its participants.

## Services Limited to Specific Types of Investments

RCA generally limits its investment advice to mutual funds, fixed income securities, real estate funds (including REITs), insurance products including annuities, equities, ETFs (including ETFs in the gold and precious metal sectors), treasury inflation protected/inflation linked bonds, commodities, non-U.S. securities and venture capital funds. RCA may use other securities as well to help diversify a portfolio when applicable.

## Selection of Other Advisers

RCA may direct clients to third party investment advisers. Before selecting other advisers for clients, RCA will verify that all recommended advisers are properly licensed, notice filed, or exempt in the states where RCA is recommending the adviser to clients.

## C. Client Tailored Services and Client Imposed Restrictions

RCA will tailor a program for each individual client. This will include an interview session to get to know the client's specific needs and requirements as well as a plan that will be

executed by RCA on behalf of the client. RCA may use model allocations together with a specific set of recommendations for each client based on their personal restrictions, needs, and targets. 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 RCA from properly servicing the client account, or if the restrictions would require RCA to deviate from its standard suite of services, RCA 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, fund expenses, and other administrative fees. RCA does not participate in any wrap fee programs.

#### E. Assets Under Management

RCA has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$ 35,050,000.00	\$ 0.00	December 2022

## Item 5: Fees and Compensation

## A. Fee Schedule

## Portfolio Management Fees

Household Account Asset Value	Annual Advisory Fee	Monthly Advisory Fee
\$0 - \$500,000	1.20 %	0.10 %
\$500,001-\$1,000,000	1.00 %	0.0833 %
\$1,000,001 - 2,000,000	0.75 %	0.0625 %
> \$2,000,000	Negotiable	Negotiable

The advisory fee is calculated using the value of the assets in the Account on the last business day of the prior billing period.

These fees are generally 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 RCA's fees within five business days of signing the Investment Advisory

Contract. Thereafter, clients may terminate the Investment Advisory Contract generally with 7 days' written notice.

Assets received into the Account during the fee period will not be charged a fee until the start of the next billing period. As such, fees for the management of the additional assets will be billed and payable in the month following the date in which the additional deposit was received. Likewise, withdrawals taken from the account will not receive a refund of fees for the remaining days in the billing period at the end of the month. Again, fees will be calculated based on the Account balance on the last business day of the prior month.

#### Financial Planning Fees

#### **Fixed Fees**

The negotiated fixed rate for creating client financial plans is between \$0 and \$500.

Clients may terminate the agreement without penalty, for full refund of RCA's fees, within five business days of signing the Financial Planning Agreement. Thereafter, clients may terminate the Financial Planning Agreement generally upon written notice.

#### 401k Investment Management

Household Account Asset Value	Annual Advisory Fee	Quarterly Advisory Fee
All Assets	1.00 %	0.25%

An average of the daily balance in the client's account throughout the billing period is used to determine the market value of the assets upon which the 401k Investment Management is based.

## Selection of Other Advisers Fees

RCA may direct clients to third-party investment advisers. RCA will be compensated via a fee share from the advisers to which it directs those clients. The fees shared are negotiable and will not exceed any limit imposed by any regulatory agency. The notice of termination requirement and payment of fees for third-party investment advisers will depend on the specific third-party adviser selected.

RCA may specifically direct clients to Brinker Capital Investments. The annual fee schedule is as follows:

Total Assets	RCA's Fee	Third Party's Fee	Total Fee
\$0 - \$10,000	1.25%	0%	1.25%
\$10,001+	1.00%	0.25%	1.25%

RCA may specifically direct clients to Altruist, LLC. The annual fee schedule is as follows:

Total Assets	RCA's Fee	Third Party's Fee	Total Fee
\$0 - \$500,000	1.20%	Up to 0.50%	Up to 1.70%
\$500,001 - \$1,000,000	1.00%	Up to 0.50%	Up to 1.50%
\$1,000,001+	0.75%	Up to 0.50%	Up to 1.25%

RCA may specifically direct clients to Gradient Investments. The annual fee schedule is as follows:

Total Assets	RCA's Fee	Third Party's Fee	Total Fee
\$0 - \$1,000,000	1.00%	0.70%	1.70%
\$1,000,001 - \$2,000,000	0.75%	0.60%	1.35%
\$2,000,001 - \$3,000,000	0.50%	0.50%	1.00%
\$3,000,001 +	0.50%	0.40%	0.90%

#### **B.** Payment of Fees

### Payment of Portfolio Management Fees

Asset-based portfolio management fees are withdrawn directly from the client's accounts with client's written authorization on a monthly basis. Fees are paid in advance.

## Payment of Financial Planning Fees

Financial planning fees are paid via check.

Fixed financial planning fees are paid 100% in advance, but never more than six months in advance.

## Payment of 401k Investment Management Fees

401k Investment Management fees are withdrawn directly from the client's accounts with client's written authorization. Fixed 401k Investment Management fees are paid in arrears.

## Payment of Selection of Other Advisers Fees

Fees for selection of Brinker Capital Investments as third-party adviser are withdrawn by Brinker Capital Investments directly from client accounts. RCA then receives its portion of the fees from Brinker Capital Investments; RCA does not directly deduct the advisory fees. Fees for Brinker Capital Investments are paid quarterly in arrears.

Fees for selection of Altruist, LLC as third-party adviser are withdrawn directly from the client's accounts by RCA with client's written authorization on a monthly basis. Fees are paid in advance.

Fees for selection of Gradient Investments as third-party adviser are withdrawn directly from the client's accounts by RCA with client's written authorization on a monthly basis. Fees for Gradient Investments are paid quarterly in arrears.

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

#### D. Prepayment of Fees

RCA collects fees in advance. 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.)

Fixed fees that are collected in advance will be refunded based on the prorated amount of work completed at the point of termination.

## E. Outside Compensation For the Sale of Securities to Clients

Neither RCA nor its supervised persons accept any compensation for the sale of 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

RCA 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**

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

- Individuals
- High-Net-Worth Individuals
- Corporations or Business Entities

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

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

#### A. Methods of Analysis and Investment Strategies

#### Methods of Analysis

RCA's methods of analysis include Cyclical analysis, Fundamental analysis, Modern portfolio theory, Quantitative analysis and Technical analysis.

**Cyclical analysis** involves the analysis of business cycles to find favorable conditions for buying and/or selling a security.

**Fundamental analysis** involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

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

**Quantitative analysis** deals with measurable factors as distinguished from qualitative considerations such as the character of management or the state of employee morale, such as the value of assets, the cost of capital, historical projections of sales, and so on.

**Technical analysis** involves the analysis of past market data; primarily price and volume.

### Investment Strategies

RCA uses long term trading.

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

#### **B.** Material Risks Involved

#### Methods of Analysis

**Cyclical analysis** assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are two-fold: 1) the markets do not always repeat cyclical patterns; and 2) if too many investors begin to implement this strategy, then it changes the very cycles these investors are trying to exploit.

**Fundamental analysis** concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

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.

**Quantitative analysis** Investment strategies using quantitative models may perform differently than expected as a result of, among other things, the factors used in the models, the weight placed on each factor, changes from the factors' historical trends, and technical issues in the construction and implementation of the models.

**Technical analysis** attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not take into account new patterns that emerge over time.

### **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 (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. The funds can be of bond "fixed income" nature (lower risk) or stock "equity" nature.

**Equity** investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

Fixed income investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include 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 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 (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

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. Risks in investing in ETFs include trading risks, liquidity and shutdown risks, risks associated with a change in authorized participants and non-participation of authorized participants, risks that trading price differs from indicative net asset value (iNAV), or price fluctuation and disassociation from the index being tracked. With regard to trading risks, regular trading adds cost to your portfolio thus counteracting the low fees that one of the typical benefits of ETFs. Additionally, regular trading to beneficially "time the market" is difficult to achieve. Even paid fund managers struggle to do this every year, with the majority failing to beat the relevant indexes. With regard to liquidity and shutdown risks, not all ETFs have the same level of liquidity. Since ETFs are at least as liquid as their underlying assets, trading

conditions are more accurately reflected in implied liquidity rather than the average daily volume of the ETF itself. Implied liquidity is a measure of what can potentially be traded in ETFs based on its underlying assets. ETFs are subject to market volatility and the risks of their underlying securities, which may include the risks associated with investing in smaller companies, foreign securities, commodities, and fixed income investments (as applicable). Foreign securities in particular are subject to interest rate, currency exchange rate, economic, and political risks, all of which are magnified in emerging markets. ETFs that target a small universe of securities, such as a specific region or market sector, are generally subject to greater market volatility, as well as to the specific risks associated with that sector, region, or other focus. ETFs that use derivatives, leverage, or complex investment strategies are subject to additional risks. 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. The return of an index ETF is usually different from that of the index it tracks because of fees, expenses, and tracking error. An ETF may trade at a premium or discount to its net asset value (NAV) (or indicative value in the case of exchange-traded notes). The degree of liquidity can vary significantly from one ETF to another and losses may be magnified if no liquid market exists for the ETF's shares when attempting to sell them. Each ETF has a unique risk profile, detailed in its prospectus, offering circular, or similar material, which should be considered carefully when making investment decisions.

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.

Annuities are a retirement product for those who may have the ability to pay a premium now and want to guarantee they receive certain monthly payments or a return on investment later in the future. Annuities are contracts issued by a life insurance company designed to meet requirement or other long-term goals. An annuity is not a life insurance policy. Variable annuities are designed to be long-term investments, to meet retirement and other long-range goals. Variable annuities are not suitable for meeting short-term goals because substantial taxes and insurance company charges may apply if you withdraw your money early. Variable annuities also involve investment risks, just as mutual funds do.

**Venture capital funds** invest in start-up companies at an early stage of development in the interest of generating a return through an eventual realization event; the risk is high as a result of the uncertainty involved at that stage of development.

**Commodities** are tangible assets used to manufacture and produce goods or services. Commodity prices are affected by different risk factors, such as disease, storage capacity, supply, demand, delivery constraints and weather. Because of those risk factors, even a well-diversified investment in commodities can be uncertain.

**Non-U.S.** securities present certain risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available.

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 RCA 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 RCA 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

Jace W Champlin 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. RCA 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 RCA in connection with such individual's activities outside of RCA.

Michael J Rood 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. RCA 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 RCA in connection with such individual's activities outside of RCA.

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

RCA may direct clients to third-party investment advisers. RCA will be compensated via a fee share from the advisers to which it directs those clients. The fees shared will not exceed any limit imposed by any regulatory agency. This creates a conflict of interest in that RCA has an incentive to direct clients to the third-party investment advisers that provide RCA with a larger fee split. RCA will always act in the best interests of the client, including when determining which third party investment adviser to recommend to clients. RCA will verify that all recommended advisers are properly licensed, notice filed, or exempt in the states where RCA is recommending the adviser to clients.

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

#### A. Code of Ethics

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

#### B. Recommendations Involving Material Financial Interests

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

#### C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of RCA may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of RCA 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. RCA 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 RCA may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of RCA 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, RCA will never engage in trading that operates to the client's disadvantage if representatives of RCA 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 RCA'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 RCA 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 RCA's research efforts. RCA will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian.

RCA will require clients to use Equity Trust Company or TD Ameritrade Institutional, a division of TD Ameritrade, Inc. Member FINRA/SIPC ("TD Ameritrade"). TD Ameritrade is an independent and unaffiliated SEC-registered broker-dealer or Altruist Financial LLC (CRD#299274), an unaffiliated SEC-registered broker dealer and FINRA/SIPC member, as the introducing broker to Apex Clearing Corporation, an unaffiliated SEC-registered broker dealer and FINRA/SIPC member.

RCA utilizes Matrix Trust Company for its 401k Investment Management accounts.

## 1. Research and Other Soft-Dollar Benefits

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

## 2. Brokerage for Client Referrals

RCA 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

RCA will require clients to use a specific broker-dealer to execute transactions. By directing brokerage, RCA may at times be unable to achieve most favorable execution of client transactions which could cost clients' money in trade execution. Not all advisers require or allow their clients to direct brokerage.

#### B. Aggregating (Block) Trading for Multiple Client Accounts

If RCA buys or sells the same securities on behalf of more than one client, then it may (but would be under no obligation to) aggregate or bunch such securities in a single transaction for multiple clients in order to seek more favorable prices, lower brokerage commissions, or more efficient execution. In such case, RCA would place an aggregate order with the broker on behalf of all such clients in order to ensure fairness for all clients; provided, however, that trades would be reviewed periodically to ensure that accounts are not systematically disadvantaged by this policy. RCA would determine the appropriate number of shares and select the appropriate brokers consistent with its duty to seek best execution.

### **Item 13: Review of Accounts**

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

All client accounts for RCA's advisory services provided on an ongoing basis are reviewed at least annually by Michael Joseph Rood, Chief Compliance Officer, with regard to clients' respective investment policies and risk tolerance levels. All accounts at RCA are assigned to this reviewer.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Michael Joseph Rood, Chief Compliance Officer. Financial planning clients are provided a one-time financial plan concerning their financial situation. After the presentation of the plan, there are no further reports. Clients may request additional plans or reports for a fee.

All 401k Investment Management client accounts are reviewed at least annually by Michael Joseph Rood, Chief Compliance Officer, with regard to clients' respective investment policies and risk tolerance levels. All accounts at RCA are assigned to this reviewer.

## 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, RCA's services will generally conclude upon delivery of the financial plan.

### C. Content and Frequency of Regular Reports Provided to Clients

Each client of RCA's advisory services provided on an ongoing basis will receive a quarterly report detailing the client's account, including assets held, asset value, and calculation of fees. This written report will come from the custodian.

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

## 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)

RCA receives compensation from third-party advisers to which it directs clients.

RCA participates in the institutional advisor program (the "Program") offered by TD Ameritrade. TD Ameritrade offers to independent investment advisor services which include custody of securities, trade execution, clearance and settlement of transactions. RCA receives some benefits from TD Ameritrade through its participation in the Program.

As part of the Program, RCA may recommend TD Ameritrade to clients for custody and brokerage services. There is no direct link between RCA's participation in the Program and the investment advice it gives to its clients, although RCA receives economic benefits through its participation in the Program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving RCA participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts); the ability to have RCA's fees deducted directly from client accounts; access to an electronic communications network for client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to RCA by third party vendors. TD

Ameritrade may also pay for business consulting and professional services received by RCA's related persons. Some of the products and services made available by TD Ameritrade through the Program may benefit RCA but may not benefit its client accounts. These products or services may assist RCA in managing and administering client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help RCA manage and further develop its business enterprise. The benefits received by RCA or its personnel through participation in the Program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, RCA endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by RCA or its related persons in and of itself creates a conflict of interest and may indirectly influence RCA's choice of TD Ameritrade for custody and brokerage services.

#### B. Compensation to Non - Advisory Personnel for Client Referrals

RCA 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, RCA 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 from the custodian and billing invoices that are required in each jurisdiction from RCA, and they should carefully review those statements for accuracy.

### **Item 16: Investment Discretion**

RCA provides discretionary and non-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, RCA 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. In some instances, RCA's discretionary authority in making these determinations may be limited by conditions imposed by a client (in investment guidelines or objectives, or client instructions otherwise provided to RCA.

## **Item 17: Voting Client Securities (Proxy Voting)**

RCA 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.

### **Item 18: Financial Information**

#### A. Balance Sheet

RCA neither requires nor solicits prepayment of more than \$500 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 RCA nor its management has any financial condition that is likely to reasonably impair RCA's ability to meet contractual commitments to clients.

#### C. Bankruptcy Petitions in Previous Ten Years

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

## **Item 19: Requirements For State Registered Advisers**

# A. Principal Executive Officers and Management Persons; Their Formal Education and Business Background

The education and business backgrounds of RCA's current management persons, Jace W Champlin and Michael J Rood, can be found below.

Jace W Champlin graduated with a Bachelor of Science in Finance from Northwest Missouri State University in 2007. Mr. Champlin is a ChFC®- Chartered Financial Consultant®. Mr. Champlin has been an investment adviser representative with RCA since 2021. Prior to RCA, Mr. Champlin was an investment adviser representative with Insight Financial Services from 2019-2021 and Ameritas Investment Corp. from 2013-2019.

Michael J Rood graduated with a Bachelor of Arts in Economics form University of California Irvine in 1991. Mr. Rood has been an investment adviser representative with RCA since 2021. Prior to RCA, Mr. Rood was an Investment Advisor Representative with Insight Financial Services from 2019-2021, a Financial Advisor with Ameritas Investment Corp from 2013-2019 and a registered representative with Securities America from 2019-2020.

# B. Other Businesses in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (If Any)

Other business activities for each relevant individual can be found in Item 10 of this brochure.

## C. Calculation of Performance-Based Fees and Degree of Risk to Clients

RCA 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.

## D. Material Disciplinary Disclosures for Management Persons of this Firm

There are no civil, self-regulatory organization, or arbitration proceedings to report under this section.

# E. Material Relationships That Management Persons Have With Issuers of Securities (If Any)

See Item 10.C and 11.B.

#### Kansas Addendum to Firm Brochure

Disclosure for clients and prospective clients residing in Kansas: Please be advised that the investment advisory firm does not have professional liability insurance coverage for its investment advisory services. If applicable, a copy of the insurance agreement for the firm's professional liability insurance coverage will be provided to the client upon request.