Ridgeline Wealth Planning LLC
Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of Ridgeline Wealth Planning LLC. If you have any questions about the contents of this brochure, please contact us at (937) 739-3744 or by email at: team@ridgelinewealthplanning.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 Ridgeline Wealth Planning LLC is also available on the SEC's website at www.adviserinfo.sec.gov. Ridgeline Wealth Planning LLC's CRD number is: 307702.

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Registration as an investment adviser does not imply a certain level of skill or training.

Version Date: 10/01/2026

Item 2: Material Changes

The material changes in this brochure from the last annual updating amendment of Ridgeline Wealth Planning LLC on 03/14/2025 are described below. Material changes relate to Ridgeline Wealth Planning LLC's policies, practices or conflicts of interests.

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Item 4: Advisory Business

A. Description of the Advisory Firm

Ridgeline Wealth Planning LLC (hereinafter "RWP") is a Limited Liability Company organized in the State of Ohio. The firm was formed in February 2020, and the principal owner is Scott W Simons.

B. Types of Advisory Services

Portfolio Management Services

RWP offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. RWP utilizes a suitability document for each client. The suitability document outlines the client's current situation including income and risk tolerance levels. RWP 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
- Asset allocation
- Risk tolerance
- Personal investment policy
- Asset selection
- Regular portfolio monitoring

RWP evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. RWP will require discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented in the Investment Advisory Client Information Form.

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

RWP uses a third-party platform to facilitate management of held away assets such as defined contribution plan participant accounts, with discretion. [The platform allows RWP to avoid being considered to have custody of client funds since RWP will not have direct access to client log-in credentials to effect trades.] RWP is not affiliated with the platform in any way and receives no compensation from the company for using its platform. A link will be provided to the client allowing them to connect any accounts to the platform. Once

these accounts are connected to the platform, RWP will review the current account allocations. When deemed necessary, RWP will rebalance the account considering client investment goals and risk tolerance, and any change in allocations will consider current economic and market trends. Client accounts will be reviewed at least quarterly, and allocation changes will be made as deemed necessary.

Selection of Other Advisers

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

Pension Consulting Services

RWP offers consulting services to pension or other employee benefit plans (including but not limited to 401(k) plans). Pension consulting 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 pension consulting plan

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

Financial Planning

Financial plans and financial planning may include, but are not limited to: investment planning, insurance, tax planning, retirement planning, college planning, and liabilities planning.

In offering financial planning, a conflict exists between the interests of the investment adviser and the interests of the client. The client is under no obligation to act upon the investment adviser's recommendation, and, if the client elects to act on any of the recommendations, the client is under no obligation to affect the transaction through the investment adviser. This statement is required by California Code of Regulations, 10 CCR Section 260.235.2.

Services Limited to Specific Types of Investments

RWP 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 private placements, although RWP primarily recommends asset allocation. RWP may use other securities as well to help diversify a portfolio when applicable.

Written Acknowledgement of Fiduciary Status

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice).
- Never put our financial interests ahead of yours when making recommendations (give loyal advice).
- Avoid misleading statements about conflicts of interest, fees, and investments.
- Follow policies and procedures designed to ensure that we give advice that is in your best interest.
- Charge no more than is reasonable for our services.
- Give you basic information about conflicts of interest.

C. Client Tailored Services and Client Imposed Restrictions

RWP 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 RWP on behalf of the client. RWP 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 RWP from properly servicing the client account, or if the restrictions would require RWP to deviate from its standard suite of services, RWP reserves the right to end the relationship.

RWP may utilize AI services as a support tool in our business. Any AI use will comply with regulatory principles, our Code of Ethics, and industry-recognized best practices. RWP may use this feature in notetaking during client meetings.

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. RWP does not participate in any wrap fee programs.

E. Assets Under Management

RWP has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
$259,307,829.00	$243,085.00	December 2025

Item 5: Fees and Compensation

A. Fee Schedule

Portfolio Management Fees

Total Assets Under Management	Annual Fees
$0 - $2,000,000	1.00%
$2,000,001 - $4,000,000	0.90%
$4,000,001 - $7,000,000	0.80%
$7,000,001 and Up	0.65%

Fee Schedule is straight tier. Lower fees for comparable services may be available from other sources.

RWP uses the value of the account as of the last business day of the billing period, after taking into account deposits and withdrawals, for purposes of determining the market value of the assets upon which the advisory fee is based. A select group of accounts use the average balance at the end of the quarter based on the Custodian requirements.

These fees are generally negotiable. Clients may terminate the agreement without penalty for a full refund of RWP's fees within five business days of signing the Investment Advisory Agreement. Thereafter clients or RWP may terminate the client relationship at any time.

Selection of Other Advisers Fees

RWP may direct clients to sub-adviser investment advisers. RWP will receive its standard fee on top of the fee paid to the sub-adviser adviser. 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 sub-adviser investment advisers will depend on the specific sub-adviser adviser selected.

Total Assets	RWP's Fee	Estimated Sub-Adviser's Fee	Total Fee
$0 - $2,000,000	1.00%	0.20%	1.20%
$2,000,001 -$4,000,000	0.90%	0.20%	1.10%
$4,000,001 - $7,000,000	0.80%	0.20%	1.00%
$7,000,001 and Up	0.65%	0.20%	0.85%

Pension Consulting Services Fees

Total Assets Under Management	Annual Fee
$0 - $2,000,000	1.00%
$2,000,001 - $4,000,000	0.90%
$4,000,001 - $7,000,000	0.80%
$7,000,001 and Up	0.65%

Fee Schedule is straight tier. Lower fees for comparable services may be available from other sources.

RWP uses the value of the account as of the last business day of the billing period, after taking into account deposits and withdrawals, for purposes of determining the market value of the assets upon which the advisory fee is based. These fees are generally negotiable. A select group of account use the average balance at the end of the quarter based on the Custodian requirements.

Clients may terminate the agreement without penalty for a full refund of RWP's fees within five business days of signing the pension consulting agreement. Thereafter, clients or RWP may terminate the client relationship at any time.

Financial Planning Fees

As a standalone agreement RWP typically charges a base quarterly financial planning fee of approximately $500 per quarter, paid in arrears. Alternatively, RWP also offers financial planning at an hourly rate of $400 per hour, paid in arrears. These fees are negotiable and lower fees for comparable services may be available from other sources.

Clients may terminate the agreement without penalty, for full refund of RWP's fees, within five business days of signing the Financial Planning Agreement.
Thereafter, clients or RWP may terminate the client relationship at any time.

B. Payment of Fees

Payment of Portfolio Management Fees

Asset-based portfolio management fees will be invoiced and billed directly to the client's account with their designated custodian. Fees are paid on a quarterly basis in arrears.

Payment of Selection of Other Advisers Fees

JP Morgan will deduct fees in advance and Goldman Sachs will deduct in arrears. Fees for both the sub advisers and RWP will be deducted from the client's Schwab account.

Payment of Pension Consulting Fees

Pension consulting fees are withdrawn directly from the client's accounts with client's written authorization on a quarterly basis or may be invoiced and billed directly to the client on a quarterly basis. Clients may select the method in which they are billed. Fees are paid in arrears.

Payment of Financial Planning Fees

Financial planning fees are paid via taxable brokerage account or via check. Hourly financial planning fees are payable in arrears upon completion.

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

D. Prepayment of Fees

RWP collects its fees in arrears. It does not collect fees in advance.

E. Outside Compensation for the Sale of Securities to Clients

Neither RWP 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

RWP 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

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

- Individuals and Families
- High-Net-Worth Individuals and Families
- Pension and Profit-Sharing Plans
- Charitable Organizations
- Corporations or Business Entities

RWP has a soft minimum opening balance of $250,000 for client relationships. Exceptions can be made in certain circumstances at RWP's discretion on a case-by-case basis.

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

A. Methods of Analysis and Investment Strategies

Methods of Analysis

RWP's methods of analysis include Modern portfolio theory.

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 assets.

Investment Strategies

RWP most often utilizes long term trading strategies for the selection of investment allocations. Tactical trading strategies may be used for specific client situations and is determined at the discretion of RWP.

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

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.

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.

Tactical Trading strategies seek to generate investment returns by taking advantage of short-to-medium term market opportunities. This form of trading may involve a higher degree of risks to the client's assets in comparison to a long-term strategy. These risks are monitored and reviewed on a case-by-case basis.

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.

Private placements carry a substantial risk as they are subject to less regulation than are publicly offered securities, the market to resell these assets under applicable securities laws may be illiquid, due to restrictions, and the liquidation may be taken at a substantial discount to the underlying value or result in the entire loss of the value of such assets.

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 RWP 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 Adviser

Neither RWP nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Adviser or an associated person of the foregoing entities.

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

As a fiduciary, RWP has certain legal obligations, including the obligation to act in clients' best interest. RWP maintains a Business Continuity and Succession Plan and seeks to avoid a disruption of service to clients in the event of an unforeseen loss of key personnel, due to disability or death. To that end, RWP has entered into a succession agreement with Focus Partners Wealth, LLC, effective February 6, 2023. RWP can provide additional information to any current or prospective client upon request to Scott W. Simons, CCO at 973-739-3744 or business@ridgelinewealthplanning.com.

Neither RWP nor its representatives have any material relationships to this advisory business that would present a possible conflict of interest. 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 reasonable expected to impair the rendering of unbiased and objective advice.

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

RWP may direct clients to sub-adviser investment advisers. The Sub-Advisers will deduct their fees separately than RWP from client's accounts. RWP will always act in the best interests of the client, including when determining which third-party investment adviser to recommend to clients. RWP will ensure that all recommended advisers are exempt, licensed or notice filed in the states in which RWP is recommending them to clients.

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

A. Code of Ethics

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

B. Recommendations Involving Material Financial Interests

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

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of RWP may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of RWP to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting from the recommendations they provide to clients. Such transactions may create a conflict of interest. RWP 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 RWP may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of RWP to buy or sell securities before or after recommending securities to clients resulting in representatives profiting from the recommendations they provide to clients. Such transactions may create a conflict of interest; however, RWP will never engage in trading that operates to the client's disadvantage if representatives of RWP 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 RWP'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 RWP 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 RWP's research efforts. RWP will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian.

RWP will primarily require clients to use Charles Schwab & Co. Inc. In certain instances, other custodians may be recommended as determined by RWP.

1. *Research and Other Soft-Dollar Benefits*

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

2. *Brokerage for Client Referrals*

RWP 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*

RWP will require clients to use a specific broker-dealer to execute transactions. Not all advisers require clients to use a particular broker-dealer.

B. Aggregating (Block) Trading for Multiple Client Accounts

If RWP 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, RWP 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. RWP would determine the appropriate number of shares and select the appropriate brokers consistent with its duty to seek best execution, except for those accounts with specific brokerage direction (if any).

Item 13: Review of Accounts

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

All client accounts for RWP's advisory services provided on an ongoing basis are reviewed at least annually by Scott W Simons, President, or another Investment Advisory Representative of RWP with regard to clients' respective investment goals and risk tolerance levels.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Scott W Simons, President or another Investment Advisory Representative of RWP. Financial planning clients are provided a one-time financial plan concerning their financial situation.

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).

C. Content and Frequency of Regular Reports Provided to Clients

Each client of RWP's advisory services provided on an ongoing basis will receive a quarterly report detailing the client's account, including assets held, asset value, quarterly fees that were charged, and a transaction history. 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)

RWP may host or attend mutual fund company or other company educational programs, events, or conferences where expenses are paid for (in part or in whole) by mutual funds companies or other third parties whose products and services that RWP utilizes in providing advisory services. This may also include these entities sharing in the cost of a client event hosted by RWP. This may represent a conflict of interest in that RWP has an incentive to use and promote the products and service of these third parties. To address this potential conflict, RWP will always act in the best interest of its clients consistent with its fiduciary duty as an investment adviser.

Schwab

Charles Schwab & Co., Inc. Adviser Services provides RWP with access to Charles Schwab & Co., Inc. Adviser Services' institutional trading and custody services, which are typically not available to Charles Schwab & Co., Inc. Adviser Services retail investors. These services generally are available to independent investment advisers on an unsolicited basis, at no charge to them so long as a total of at least $10 million of the adviser's clients' assets are maintained in accounts at Charles Schwab & Co., Inc. Adviser Services. Charles Schwab & Co., Inc. Adviser Services includes brokerage services that are related to the execution of securities transactions, custody, research, including that in the form of advice, analyses and reports, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment. For RWP client accounts maintained in its custody, Charles Schwab & Co., Inc. Adviser Services generally does not charge separately for custody services but is compensated by account holders through commissions or other transaction-related or asset-based fees for securities trades that are executed through Charles Schwab & Co., Inc. Adviser Services or that settle into Charles Schwab & Co., Inc. Adviser Services accounts.

Charles Schwab & Co., Inc. Adviser Services also makes available to RWP other products and services that benefit RWP but may not benefit its clients' accounts. These benefits may include national, regional or RWP specific educational events organized and/or sponsored by Charles Schwab & Co., Inc. Adviser Services. Other potential benefits may include occasional business entertainment of personnel of RWP by Charles Schwab & Co., Inc. Adviser Services personnel, including meals, invitations to sporting events, including golf tournaments, and other forms of entertainment, some of which may accompany educational opportunities. Other of these products and services assist RWP in managing and administering clients' accounts. These include software and other technology (and related technological training) that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of

aggregated trade orders for multiple client accounts, if applicable), provide research, pricing information and other market data, facilitate payment of RWP's fees from its clients' accounts (if applicable), and assist with back-office training and support functions, recordkeeping and client reporting.

Many of these services generally may be used to service all or some substantial number of RWP's accounts. Charles Schwab & Co., Inc. Adviser Services also makes available to RWP other services intended to help RWP manage and further develop its business enterprise. These services may include professional compliance, legal and business consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, employee benefits providers, and human capital consultants, insurance and marketing. In addition, Charles Schwab & Co., Inc. Adviser Services may make available, arrange and/or pay vendors for these types of services rendered to RWP by independent third parties. Charles Schwab & Co., Inc. Adviser Services may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to RWP. RWP is independently owned and operated and not affiliated with Charles Schwab & Co., Inc. Adviser Services.

B. Compensation to Non – Advisory Personnel for Client Referrals

RWP 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, RWP will be deemed to have limited custody of client's assets. Because client fees will be withdrawn directly from client accounts, in states that require it, RWP will:

(A) Possess written authorization from the client to deduct advisory fees from an account held by a qualified custodian.

(B) Send the qualified custodian written notice of the amount of the fee to be deducted from the client's account and verify that the qualified custodian sends statements to the client which details the fees that RWP has been paid.

Clients will receive all account statements from their custodian. They should carefully review these statements for accuracy.

Item 16: Investment Discretion

RWP provides 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, RWP 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, RWP'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 RWP.)

Item 17: Voting Client Securities (Proxy Voting)

RWP 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. In cases were a sub-adviser is used, proxy voting will be managed by the sub adviser.

Item 18: Financial Information

A. Balance Sheet

RWP neither requires nor solicits prepayment of more than $ 1200 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 RWP nor its management has any financial condition that is likely to reasonably impair RWP's ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years

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