

# **RCS Financial Planning, LLC**

## **Firm Brochure - Form ADV Part 2A**

### **Item 1: Cover Page**

This brochure provides information about the qualifications and business practices of RCS Financial Planning, LLC. If you have any questions about the contents of this brochure, please contact us at (410) 224-0097 or by email at: [ted@rcsplanning.com](mailto:ted@rcsplanning.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 RCS Financial Planning, LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). RCS Financial Planning, LLC's CRD number is: 291678.

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Registration does not imply a certain level of skill or training.

Version Date: March 15, 2024

## Item 2: Material Changes

There have been no material changes since the most recent filing dated June 30, 2023.

### Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of RCS Financial Planning, LLC.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at <http://www.adviserinfo.sec.gov> by searching for our firm name or by our CRD number 291678. You may also request a copy of this Disclosure Brochure at any time, by contacting us at (410) 224-0097.

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## Item 4: Advisory Business

### A. Description of the Advisory Firm

RCS Financial Planning, LLC (hereinafter “RCS”) is a Limited Liability Company organized in the State of Maryland. The firm was formed in November 2017, and the principal owner is Thaddeus N Toal Jr.

### B. Types of Advisory Services

#### Portfolio Management Services

RCS offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. RCS creates an Investment Policy Statement for each client, which outlines the client’s current situation and risk tolerance 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:

<ul style="list-style-type: none"><li>• Investment strategy</li></ul>	<ul style="list-style-type: none"><li>• Personal investment policy</li></ul>
<ul style="list-style-type: none"><li>• Asset allocation</li></ul>	<ul style="list-style-type: none"><li>• Asset selection</li></ul>
<ul style="list-style-type: none"><li>• Risk tolerance</li></ul>	<ul style="list-style-type: none"><li>• Regular portfolio monitoring</li></ul>

RCS evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. RCS will request 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 Policy Statement, which is given to each client.

RCS seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of RCS’s economic, investment or other financial interests. To meet its fiduciary obligations, RCS attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, RCS’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 RCS’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.

#### Ongoing Financial Planning

This service involves working one-on-one with a planner over an extended period of time. By paying a fixed monthly fee, Clients get to work with a planner who will work with them to develop and implement their plan. The planner will monitor the plan, recommend any changes and ensure the plan is up to date.

Upon desiring a comprehensive plan, a Client will be taken through establishing their goals and values around money. They will be required to provide information to help complete the following areas of analysis: net worth, cash flow, insurance, employee benefits, retirement planning, insurance, investments, college planning, and estate planning. Once the Client's information is reviewed, their plan will be built and analyzed, and then the findings, analysis, and potential changes to their current situation will be reviewed with the

Client. Clients subscribing to this service will receive a written or an electronic report, providing the Client with a detailed financial plan designed to achieve his or her stated financial goals and objectives. If a follow-up meeting is required, we will meet at the Client's convenience. The plan and the Client's financial situation and goals will be monitored throughout the year and follow-up phone calls and emails will be made to the Client to confirm that any agreed upon action steps have been carried out. On an annual basis, there will be a full review of this plan to ensure its accuracy and ongoing appropriateness. Any needed updates will be implemented at that time.

### **Pension Consulting Services**

RCS 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; life insurance; tax concerns; retirement planning; college planning; and debit/credit planning.

### **Selection of Other Advisers (Sub-Advisers)**

RCS may direct clients to third-party investment advisers. Before selecting other advisers for clients, RCS will verify that all recommended advisers are properly licensed, notice filed, or exempt in the states where RCS is recommending the adviser to clients. Our review process and analysis of outside managers is further discussed in Item 8 of this Form ADV Part 2A. Additionally, we will meet with the Client on a periodic basis to discuss changes in their personal or financial situation, suitability, and any new or revised restrictions to be applied to the account. Fees pertaining to this service are outlined in Item 5 of this brochure.

### **Services Limited to Specific Types of Investments**

RCS generally limits its investment advice to mutual funds, fixed income securities, real estate funds (including REITs), insurance products including annuities, equities, ETFs, treasury inflation protected/inflation linked bonds and non-U.S. securities, although RCS primarily recommends evidence based mutual funds. RCS may use other securities as well to help diversify a portfolio when applicable

## **C. Client Tailored Services and Client Imposed Restrictions**

RCS 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 RCS on behalf of the client. RCS 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.

## D. Wrap Fee Programs

The wrap fee program is an investment program wherein the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and any other administrative fees. RCS does not participate in any wrap fee programs.

## E. Assets Under Management

RCS Financial Planning, LLC is registered as an Investment Adviser with the SEC, domiciled in the State of Maryland. We were founded in November 2017. Thaddeus N Toal Jr is the principal owner. RCS currently reports \$198,776,808 in discretionary Assets Under Management and no non-discretionary Assets Under Management. Assets Under Management were calculated as of December 31, 2023.

# Item 5: Fees and Compensation

## A. Fee Schedule

### Portfolio Management Fees

Total Assets Under Management	Annual Fees
First \$1,000,000	1.00%
Next \$2,000,000	0.75%
\$3,000,000 - and up	0.60%

The advisory fee is a blended fee and is calculated by assessing the percentage rates using the predefined levels of assets as shown in the above chart resulting in a combined weighted fee. For example, an account valued at \$2,000,000 would pay an effective fee of 0.875% with an annual fee of \$17,500.00. The quarterly fee is determined by the following calculation:  $((\$1,000,000 \times 1.00\%) + (\$1,000,000 \times 0.75\%)) \div 4 = \$4,375$ .

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 is attached as Exhibit II of the Investment Advisory Agreement. No increase in the annual fee shall be effective without agreement from the Client by signing a new agreement or amendment to their current advisory agreement. Clients may terminate the agreement without penalty for a full refund of RCS's fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract generally with 30 days written notice.

### Ongoing Financial Planning

Ongoing Financial Planning consists of an upfront charge of \$0 - \$4,000 and an ongoing fee that is paid monthly, in arrears, at the rate of \$0 - \$300 per month. The fee may be negotiable in certain cases. This service may be terminated with 30 days' notice.

The upfront portion of the Comprehensive Financial Planning fee is for Client onboarding, data gathering,

and setting the basis for the financial plan. This work will commence immediately after the fee is paid, and will be completed within the first 90 days of the date the fee is paid. Therefore, the upfront portion of the fee will not be paid more than 6 months in advance.

Clients with more than \$350,000 in Assets Under Management will receive ongoing financial planning at no additional cost.

We review the fee every 12 months. If your financial circumstances have changed, your fee will also change.

## **Pension Consulting Services Fees**

### **Fixed Fees**

The rate for creating client pension consulting plans is between \$1,000 and \$5,000. The final fee schedule will be attached as Exhibit II of the pension consulting agreement. This service may be canceled with 30 days' notice.

## **Financial Planning Fees**

### **Fixed Fees**

The negotiated fixed rate for creating client financial plans is between \$750 and \$10,000.

## **Selection of Other Advisers Fees**

When an outside manager is used, the above list fee schedule includes both RCS's fee, and the outside manager's fee.-This relationship will be memorialized in each contract between RCS and each third-party adviser. The fees will not exceed any limit imposed by any regulatory agency. RCS has discretion to choose sub-advisers.

## **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 quarterly basis. Fees are paid in advance.

Fixed pension consulting fees are paid via check. These fees are paid 50% in advance, but never more than six months in advance, with the remainder due upon presentation of the plan.

### **Payment of Financial Planning Fees**

Financial planning fees are paid via check or electronic funds transfer.

Project based financial planning fees are charged half in advance, remainder due upon completion Hourly financial planning fees are paid in arrears upon completion.

### **Payment of Selection of Other Advisers Fees**

Fees for selection of Betterment, LLC as third-party adviser are withdrawn directly from the client's accounts with client's written authorization. Fees 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 RCS. Please see Item 12 of this brochure regarding broker-dealer/custodian.

## **D. Prepayment of Fees**

RCS collects certain fees in advance and certain fees in arrears, as indicated above. Refunds for fees paid in advance will be 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 RCS 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**

RCS 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**

RCS generally provides advisory services to the following types of clients

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

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

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

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

#### **Methods of Analysis**

RCS'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 asset.

### **Investment Strategies**

RCS 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**

**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.

**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 cost 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):** ETFs are pooled investment securities that operate much like mutual funds. Typically, ETFs will track a particular index, sector, commodity, or other assets, but unlike mutual funds, ETFs can be purchased or sold on a stock exchange the same way that a regular stock can. An ETF can be structured to track anything from the price of an individual commodity to a large and diverse collection of securities. Prices may vary significantly from the Net Asset Value due to market conditions. Certain Exchange Traded Funds may not track underlying benchmarks as expected. The Adviser has no control over the risks taken by the underlying funds in which the Clients invest.

**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.

**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 RCS 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 RCS 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**

Thaddeus Norman Toal Jr is a personal investor in AssetBook; approximately .15%. Portfolio accounting that produces reports for client meeting. He does not receive any compensation. Clients do not pay any fee for the services provided by AssetBook.

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

RCS may direct clients to third-party investment advisers. RCS will always act in the best interests of the client, including when determining which third-party investment adviser to recommend to clients. RCS will verify that all recommended advisers are properly licensed, notice filed, or exempt in the states where RCS is recommending the adviser to clients. If a third-party investment adviser is recommended for the client, RCS will ensure the fee structure is approved by client prior engaging the sub-adviser.

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

### **A. Code of Ethic**

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

## **B. Recommendations Involving Material Financial Interests**

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

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

From time to time, representatives of RCS may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of RCS 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. RCS 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 RCS may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of RCS 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, RCS will never engage in trading that operates to the client's disadvantage if representatives of RCS 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 RCS's duty to seek "best Custodians/broker-dealers will be recommended based on RCS'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. This means that RCS seeks a custodian/broker-dealer that will hold client assets and execute transactions on terms that are, overall, most advantageous when compared with other available providers and their services. RCS considers a range of factors, including but not limited to:

- Capability to execute, clear, and settle trades (buy and sell securities for your account) itself or to facilitate such services.
- Proficiency in facilitating timely transfers and payments to and from accounts.
- Availability of investment research and tools that assist us in making investment decisions.
- Competitiveness of the price of those services and willingness to negotiate the prices. [Clients will not necessarily pay the lowest commission or commission equivalent.]
- Quality of services.
- Reputation, financial strength, and stability.
- Prior service to us and our other clients.

MTG, LLC dba Betterment Securities (“Betterment Securities”), a registered broker dealer, member SIPC, will be the qualified custodian for client accounts using Betterment LLC and/or Betterment Institutional. RCS is independently owned and operated; it is not affiliated with Betterment Securities. Clients will open the account with Betterment Securities by entering into an account agreement directly with them. While we do not open the account for you, we may assist you in doing so.

RCS recommends Fidelity Brokerage Services LLC, Charles Schwab & Co.. Member FINRA/SIPC and APEX accounts that are not using Betterment.

## **1. Research and Other Soft-Dollar Benefits**

While RCS has no formal soft dollars program in which soft dollars are used to pay for third party services, RCS may receive research, products, or other services from its broker/dealer in connection with client securities transactions (“soft dollar benefits”) consistent with (and not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended, and may consider these benefits in recommending brokers. There can be no assurance that any particular client will benefit from any particular soft dollar research or other benefits. RCS benefits by not having to produce or pay for the research, products or services, and RCS will have an incentive to recommend a broker dealer based on receiving research or services.

**BROKERAGE AND CUSTODY COSTS** - For client accounts that Betterment Securities maintains, Betterment Securities generally does not charge separately for custody services. It is instead compensated as part of the Betterment Institutional platform fee, which is a percentage of the dollar amount of assets in the account in lieu of commissions. RCS has determined that having Betterment Securities execute trades is consistent with its duty to seek “best execution” of trades (see above).

**SERVICES AVAILABLE TO RCS VIA BETTERMENT INSTITUTIONAL** -Betterment Securities serves as broker-dealer to Betterment Institutional, an investment and advice platform serving independent investment advisory firms. Betterment Institutional also offers available various support services, which may not be available to its retail customers. Some of those services help RCS manage or administer client accounts, while others help us manage and grow our business. Betterment Institutional’s support services are generally available on an unsolicited basis (RCS does not have to request these services) and at no additional charge to RCS. The following is a more detailed description of Betterment Institutional’s support services:

1. **SERVICES THAT BENEFIT THE CLIENT.** Betterment Institutional includes access to a range of investment products, execution of securities transactions, and custody of client assets through Betterment Securities. Betterment Securities’ services described in this paragraph generally benefit clients and their accounts.
2. **SERVICES THAT MAY NOT DIRECTLY BENEFIT CLIENTS.** Betterment Institutional also makes available to RCS other products and services that benefit RCS but may not directly benefit the client or client accounts. These products and services assist RCS in managing and administering client accounts, such as software and technology that may:
  - Assist with back-office functions, recordkeeping, and client reporting of our accounts.
  - Provide access to client account data (such as duplicate trade confirmations and account statements).
  - Provide pricing and other market data.
  - Assist with back-office functions, recordkeeping, and client reporting.

3. SERVICES THAT GENERALLY BENEFIT ONLY US. By using Betterment Institutional, we will be offered other services intended to help us manage and further develop our business enterprise. These services include:
- Educational conferences and events.
  - Consulting on technology, compliance, legal, and business needs.
  - Publications and conferences on practice management and business succession.

#### RCS'S INTEREST IN BETTERMENT SECURITIES' SERVICES

The availability of these services from Betterment Institutional benefits RCS because we do not have to produce or purchase them. In addition, RCS does not have to pay an additional fee for Betterment Securities' services, although these services may be contingent upon RCS committing a certain amount of assets to Betterment Securities for custody. RCS has an incentive to have clients maintain their accounts with Betterment Securities based on RCS's interest in receiving Betterment Institutional's and Betterment Securities' services that benefit our business rather than based on clients' interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a conflict of interest. However, the availability to us of Betterment Institutional's and Betterment Securities' products and services is not based on RCS giving particular investment advice, such as buying particular securities for its clients. Moreover, RCS believes that use of Betterment Securities as custodian and broker-dealer is in the clients' best interests and consistent with RCS's fiduciary duty. RCS's election of Betterment Securities is primarily supported by the scope, quality, and price of services (described above) rather than Betterment Institutional's and Betterment Securities' services that benefit RCS directly.

Custodians/broker-dealers will be recommended based on RCS'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 RCS may also consider the market expertise and research access provided by the brokerdealer/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 RCS's research efforts. RCS will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian.

RCS recommends Fidelity Brokerage Services LLC, Charles Schwab & Co.. Member FINRA/SIPC, Betterment and APEX.

## **2. Brokerage for Client Referrals**

RCS 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**

RCS may permit clients to direct it to execute transactions through a specified broker-dealer. If a client directs brokerage, then the client will be required to acknowledge in writing that the client's direction with respect to the use of brokers supersedes any authority granted to RCS to select brokers; this direction may result in higher commissions, which may result in a disparity between free and directed accounts; and trades for the client and other directed accounts may be executed after trades for free accounts, which may result in less favorable prices, particularly for illiquid securities or during volatile market conditions. Not all investment advisers allow their clients to direct brokerage.



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

RCS does not aggregate or bunch the securities to be purchased or sold for multiple clients. This may result in less favorable prices, particularly for illiquid securities or during volatile market conditions.

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

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

All client accounts for RCS's advisory services provided on an ongoing basis are reviewed at least Quarterly by Thaddeus N Toal Jr, Managing Member, with regard to clients' respective investment policies and risk tolerance levels. All accounts at RCS are assigned to this reviewer.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Thaddeus N Toal Jr, Managing Member. 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.

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

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

Each client of RCS'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)**

Charles Schwab & Co., Inc. Advisor Services provides RCS with access to Charles Schwab & Co., Inc. Advisor Services' institutional trading and custody services, which are typically not available to Charles Schwab & Co., Inc. Advisor 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. Advisor Services. Charles Schwab & Co., Inc. Advisor 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 RCS client accounts maintained in its custody, Charles Schwab & Co., Inc. Advisor 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. Advisor Services or that settle into Charles Schwab & Co., Inc. Advisor Services accounts.

## **B. Compensation to Non – Advisory Personnel for Client Referrals**

The Advisor does not engage independent solicitors to provide client referrals.

## **Item 15: Custody**

When advisory fees are deducted directly from client accounts at client's custodian, RCS 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 and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy.

## **Item 16: Investment Discretion**

RCS 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, RCS 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, RCS'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 RCS).

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

RCS 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**

RCS neither requires nor solicits prepayment of more than \$1,200 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 RCS nor its management has any financial condition that is likely to reasonably impair RCS's



ability to meet contractual commitments to clients.

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

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