

RH Advisors, LLC

d/b/a Rock House Financial

Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of RH Advisors, LLC. If you have any questions about the contents of this brochure, please contact us at (801) 447-4200 or by email at info@rockhousefinancial.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 RH Advisors, LLC is also available on the SEC's website at www.adviserinfo.sec.gov. RH Advisors, LLC's CRD number is: 293909.

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

Version Date: 09/10/2021

Item 2: Material Changes

The material changes in this brochure from the last annual updating amendment of RH Advisors, LLC on 03/04/2021 are described below. Material changes relate to RH Advisors, LLC's policies, practices or conflicts of interests.

- RHF's Chief Compliance Officer is now Nicole Louise Roberts.(3/4/21)
- RHF has updated Advisory Services. (Item 4) (9/10/21)
- RHF has updated fees and compensation. (Item 5)(3/4/21)
- RHF is now fee-only and will not allow the sale of commissionable products. (Item 10) (3/4/21)
- RHF has received a Paycheck Protection Program Loan. (Item 18) (3/4/21)
- RHF has added additional custodians. (Item 12 & 14) (9/10/21)

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Item 4: Advisory Business

A. Description of the Advisory Firm

RH Advisors, LLC d/b/a Rock House Financial (hereinafter "RHF") is a Limited Liability Company organized in the State of Utah and registered with the Securities and Exchange Commission (SEC). The firm was formed in January 2018, and the principal owner is Robert Aamodt. RHF acts in accordance with its fiduciary duty imposed upon by the SEC rules.

B. Types of Advisory Services

Portfolio Management Services

RHF offers ongoing portfolio management services based on the client profile which includes, not limited to, individual goals, objectives, time horizon, tax levels, income, and risk tolerance.. RHF creates an investment plan with the client and documents the plan and the client profile in the client's books and records. Portfolio management services include, but are not limited to, the following:

- Investment strategy
- Client Meetings
- Asset allocation
- Asset selection
- Risk tolerance
- Regular portfolio monitoring

RHF evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. Risk tolerance levels are documented in the client's books and records and updated no less than annually if risk tolerances need reassessed. RHF will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction.

RHF primarily recommends mutual funds offered by Dimensional Fund Advisors (DFA). DFA sponsored mutual funds follow an academic investment philosophy based on economic theory. DFA funds are highly diversified with low holdings turnover and low cost. They use consistent long-term objectives based on empirical research not dependent on one portfolio manager. They employ efficient trading strategies to keep trading costs low inside the funds.

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

disadvantage certain client portfolios, and accordingly, RHF'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 RHF'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.

Pension Consulting Services

RHF 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; annuity planning and consulting; tax concerns; retirement planning; college planning; and debt and credit planning.

RHF follows the CFP® Board Practice Standards and seven-step financial planning process.

1. Understanding the client's personal and financial circumstances
2. Identifying and selecting goals
3. Analyzing the Client's current course of action and potential alternative courses of action
4. Developing the financial planning recommendations
5. Presenting the financial planning recommendations
6. Implementing the financial planning recommendations (Unless specifically excluded from the scope of engagement)
7. Monitoring progress and updating (Unless specifically excluded from the scope of engagement)

Robo-Advisory Portfolio Management Services

MTG, LLC dba Betterment Securities (“Betterment”), a registered broker-dealer, member SIPC, will be the qualified custodian for client accounts using Betterment LLC and/or Betterment Institutional. RHF 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 as a sub-advisor to the client. While we do not open the account for you, we may assist you in doing so.

RHF provides “robo-advisory” portfolio management services via an online interface, Betterment for Advisory, that is a digital wealth management platform for clients. This entails the use of algorithm-based portfolio management advice, rather than in-person investment advice. These automated investment solutions are customized to each client and based on individual characteristics, such as the client’s age, risk tolerance, income, and current assets, among others.

The services provided by Betterment include Goal Based Investment Management, Portfolio Construction Tools, Automated Investment Management Services, Website and Mobile Applications and Advisor Dashboard for monitoring client accounts.

Annuity and Insurance Consulting

For annuity or other insurance products or mutual funds that are commission products RHF advises on these as a consultant only. RHF does not get paid by commission. RHF can advise on commissionable products already owned by clients or that clients are considering purchasing as part of financial planning. For clients who would like advice and servicing help on these commissionable products, they can assign Mutual Securities, LLC as the agent. Mutual Securities provides servicing and then contracts with RHF to provide investment advisory services for those clients who have provided written consent. Mutual Securities pays RHF for consulting on these accounts and policies. See Item 10.C for details on this arrangement.

RHF refers clients to other agents or vendors for annuities and insurance if it is determined a product should be implemented as part of financial plan. One of these vendors used is DPL Financial Partners, LLC. RHF is not compensated by commission from any other company. Clients pay fees to RHF for advice and consulting on insurance products. The services and compensation are detailed in the client’s contract with RHF either as a financial planning service or portfolio management service for products with underlying investments.

RHF is a member of DPL Financial Partners, LLC’s (“DPL”) platform. They are a third-party provider of a platform of insurance consultation services to investment advisers with clients who have current or future needs for insurance products. DPL’s platform is available to SEC- and state-registered investment advisers (“RIAs”), as well as to investment advisers who are exempt for SEC and state registration (“ERAs”).

DPL offers RIAs and ERAs memberships to its platform for a fixed annual fee. Through its licensed insurance agents, who are also registered representative of The Leaders Group, Inc. an unaffiliated SEC-Registered Broker-dealer and FINRA member, offers members a variety of services relating to commission free insurance products. These services include, among others, providing members with analyses of their current methodology for evaluating client insurance needs, educating and acting as a resource to members regarding insurance products generally and specific insurance products owned by their clients or that their clients are considering purchasing, and providing members access to, and marketing support for, commission free products that insurers have agreed to offer to members' clients through DPL's platform.

For providing platform services to RIAs and ERAs, DPL receives service fees from the insurers that offer their commission free products through the platform. These service fees are based on the insurance premiums received by the insurers from DPL members' clients. RHF is not compensated by DPL. RHF clients pay for consulting services on insurance as part of financial planning services.

DPL is licensed as an insurance producer in Kentucky and other jurisdictions where require to perform the platform services. Its representatives are also licensed as insurance producers, appointed as insurance agents of the insurers offering their products through the platform, and registered representatives of the Leaders Group.

Health Savings Accounts

Health Savings Accounts helps our client's meet their goals for health and financial wellness. Through the Health Savings Administrators, RHF helps clients set up accounts and invest the funds. RHF creates an investment plan, funding and withdrawal strategies according to the client's goals and time horizon RHF helps implement the client's investment plan and provides ongoing support and investment monitoring.

Services Limited to Specific Types of Investments

RHF generally limits its investment advice to mutual funds, fixed income securities, equities, and ETFs. RHF may use other securities as well to help diversify a portfolio when applicable.

C. Client Tailored Services and Client Imposed Restrictions

RHF offers the same suite of services to all of its clients. However, specific client investment strategies and their implementation are dependent upon the client Risk Assessment which outlines each client's current situation (income, tax levels, and risk tolerance levels). 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 RHF from properly servicing the client account, or if the restrictions would require RHF to deviate from its standard suite of services, RHF reserves the right to end the relationship.

RHF may provide online “robo-advisory” portfolio management to specific clients. Client accounts are generally invested into a target allocation depending on the client’s individual profile. This automated approach factors in client financial situation and risk tolerance, although the algorithms used to provide advisory services are designed to be utilized by RHF across multiple clients. Clients may not impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs.

D. Wrap Fee Programs

RHF does not participate in wrap fee programs. Clients that engage Betterment Securities for Robo-advisory services will contract independently with Betterment and receive the Betterment Securities ADV Part 2A wrap fee brochure.

E. Assets Under Management

RHF has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$133,269,830.00	\$23,481,836.00	December 2020

Item 5: Fees and Compensation

A. Fee Schedule

Portfolio Management Fees

Total Assets Under Management	Annual Fees
\$0 - \$250,000	1.50%
\$250,001 - \$1,000,000	1.25%
\$1,000,001 - \$2,500,000	1.10%
\$2,500,001 - \$10,000,000	0.90%
\$10,000,000 – And Up	0.60%

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 Contract.

Clients may terminate the agreement without penalty for a full refund of RHF's fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract generally with seven days' written notice.

Robo-Advisory Portfolio Management Services Fees

RHF provides Robo-advisory portfolio management services via Betterment, an online interface.

Total Assets Under Management	Annual Fees
All Assets	.40%

The advisory fee is calculated based on the average daily account balance for the prior quarter.

The final fee schedule is attached as Exhibit II of the Investment Advisory Contract.

Clients may terminate the agreement without penalty, for full refund of RHF's fees, within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract with seven days' written notice.

Pension Consulting Services Fees

Asset-Based Fees for Pension Consulting

Total Assets Under Management	Annual Fee
\$0 - \$1,000,000	1.00%
\$1,000,001 - \$5,000,000	0.75%
\$5,00,001 – And Up	0.50%

For purposes of calculating the advisory fee this is based on the methodology used by the custodian and can vary. See custodian's agreement for details.

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 RHF's fees within five business days of signing the Investment Advisory Contract. Thereafter,

clients may terminate the pension consulting agreement generally with seven days' written notice.

Health Savings Account Portfolio Management Fees

Asset-Based Fees for Health Saving Accounts

Total Assets Under Management	Annual Fees
All Assets	1.00%

The advisory fee is calculated using the average daily balance of the assets in the account, calculated in arrears. The account value is not included in a break-point calculation for portfolio management fees.

These fees are detailed in the Investment Advisory Contract.

Clients may terminate the agreement without penalty for a full refund of RHF'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.

Financial Planning Fees

Fixed Fee

The following is standard fee schedule for calculating a fixed fee for financial planning. These fees are negotiable.

Total Net Worth	Annual Fee
\$0 - \$5,000,000	0.50%
\$5,000,001 - \$15,000,000	0.40%
\$15,000,001 – And Up	Negotiable

Net worth is rounded to the nearest \$25,000 for fee calculation purposes. Net worth is based on approximate values as agreed upon both parties, as of signed date of this agreement. For assets with statements, the most recent monthly or quarterly statement.

The final fee schedule is attached as Exhibit I of the Financial Planning Contract.

Hourly Fees

The negotiated hourly fee for these services is between \$150 and \$600.

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

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 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 advance. These fees are detailed on the Investment Advisory Contract.

Payment of Robo-Advisory Portfolio Management Fees

Robo-advisory portfolio management fees are withdrawn directly from the client's accounts with client's written authorization. Fees are paid quarterly in arrears.

Payment of Pension Consulting Fees

Asset-based pension consulting fees are withdrawn directly from the client's accounts with client's written authorization on a quarterly basis. Fees are paid and calculated according to agreement with custodian.

Payment of Health Savings Account Portfolio Management Fees

Health Savings Account Portfolio Management fees are withdrawn directly from the client's accounts with client's written authorization on a quarterly basis. Fees are paid in arrears.

Payment of Financial Planning Fees

Financial planning fees are paid via check, ACH, and credit/debit card.

Fixed and hourly financial planning fees are paid in advance, and the plans are delivered within 6 months.

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

Use of mutual funds may result in the client incurring additional fees relative the mutual funds. These costs are imposed by the fund manager, and will be disclosed prior to purchasing such products.

D. Prepayment of Fees

RHF 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.

For hourly fees that are collected in advance, the fee refunded will be the balance of the fees collected in advance minus the hourly rate times the number of hours of work that has been completed up to and including the day of termination.

E. Outside Compensation For the Sale of Securities to Clients

Neither RHF nor its supervised persons accept any compensation for the sale of securities or other 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

RHF 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

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

- ❖ Individuals
- ❖ High-Net-Worth Individuals
- ❖ Pension and Profit-Sharing Plans
- ❖ Small and Large Businesses and Corporations
- ❖ Municipalities
- ❖ 529 Plans

❖ Non-profit Organizations

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

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

A. Methods of Analysis and Investment Strategies

Methods of Analysis

RHF'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

RHF uses long term trading.

RHF received supporting research from DFA and utilized DFA Mutual funds in client portfolios. DFA mutual funds follow the investment strategy based on economic theory. DFA funds are highly diversified with low holdings turnover and low cost. They use consistent long-term objectives based on empirical research not dependent on one portfolio manager. They employ efficient trading strategies to keep trading costs low inside the funds. DFA provides historical market analysis, risk/return analysis, and continuing education to RHF.

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 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.

Options are contracts to purchase a security at a given price, risking that an option may expire out of the money resulting in minimal or no value. An uncovered option is a type of options contract that is not backed by an offsetting position that would help mitigate risk. The risk for a “naked” or uncovered put is not unlimited, whereas the potential loss for an uncovered call option is limitless. Spread option positions entail buying and selling multiple options on the same underlying security, but with different strike prices or expiration dates, which helps limit the risk of other option trading strategies. Option writing also involves risks including but not limited to economic risk, market risk, sector risk, idiosyncratic risk, political/regulatory risk, inflation (purchasing power) risk and interest rate risk.

Unit investment Trusts (“UIT”): Investment companies offer individuals the opportunity to invest in a diversified portfolio of securities with a low initial investment requirement. A UIT is either a regulated investment corporation (RIC) or a grantor trust. A RIC is a corporation in which the investors are joint owners, and a grantor trust grants investors proportional ownership in the UIT's underlying securities. It is difficult to predict the future performance of a UIT. If a UIT had excellent performance last year does not necessarily mean that it will duplicate that performance. For example, market conditions can change, and this year’s winning UIT could be next year’s loser.

Structured Notes: Offer individuals the opportunity to purchase a debt obligation that contains embedded derivative components that adjusts the security’s risk return profile. Also known as a Hybrid Security as the return on the note is linked to the performance of an underlying asset, group of assets or an index. These are complicated financial products and may offer little liquidity and are effected by market risk and default risks.

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 RHF 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 RHF 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

RHF has entered into an investment advisory contract with Mutual Securities, Inc. to provide investment advisory services for their variable annuity and variable life contracts. RHA receives a flat advisory fee of 55 bps for the advisory services provided.

As part of RHF's relationship with DFA, DFA may offer services to RHF to further develop the business, such as access to webinars, continuing education and research. These services could create an incentive for RHF to recommend that clients purchase investments through DFA. This is a potential conflict given that RHF's interest in recommending DFA Mutual Funds could be influenced by the receipt of DFA's services to our business. Other potential conflicts may exist regarding our use of DFA.

Robert Aamodt, Nicole Roberts and Zachary Nelson all hold insurance licenses but will no longer be selling insurance products. They are maintaining their licenses so they can provide advice relating to insurance products as part of comprehensive financial planning, as per Utah Insurance Commission Code. RHF is now fee-only and will not allow the sale of commissionable products.

Robert Paul Aamodt is an adjunct instructor at University of Utah.

Robert Paul Aamodt is a consultant at Bob Aamodt Inc.

Nicole Roberts is a consultant at NLR Consulting LLC.

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

RHF does not utilize nor select third-party investment advisers.

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

A. Code of Ethics

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

B. Recommendations Involving Material Financial Interests

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

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of RHF may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of RHF 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. RHF 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 RHF may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of RHF 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, RHF will never engage in trading

that operates to the client's disadvantage if representatives of RHF 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 RHF'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 RHF 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. RHF 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.

RHF requires clients to use TD Ameritrade Institutional, a division of TD Ameritrade, Inc. Member FINRA/SIPC, Axos Advisor Services, or Charles Schwab & Co., Inc.. Advisor Services for accounts that are not using Betterment or Health Savings Administrators will be required to use one of the qualified custodians listed.

Betterment Brokerage Services is responsible for execution of securities transactions and maintains custody of customer assets. Betterment exercises no discretion in determining if and when trades are placed; it places trades only at the direction of Betterment. Clients should understand that the appointment of Betterment as the broker for their accounts held at Betterment may result in their receiving less favorable trade executions than may be available through the use of broker-dealers that are not affiliated with Betterment.

Health Savings Administrator is responsible for securities held and maintained for health related expenses that are allowable under the program. Health Savings Administrator maintains custody of customer assets. The advisory fee is calculated using the average daily balance regarding funds held in the account. RHF chooses the investments within the Health Saving Account for each client and manages the funds thereafter. The account value is not included in a break-point calculation for portfolio management fees.

1. Research and Other Soft-Dollar Benefits

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

2. Brokerage for Client Referrals

RHF 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

RHF will require clients to use a specific custodian to execute transactions. Not all advisers require clients to use a particular custodian.

B. Aggregating (Block) Trading for Multiple Client Accounts

If RHF 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, RHF 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. RHF 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 RHF's advisory services provided on an ongoing basis are reviewed at least Annually by Nicole Louise Roberts, CCO, with regard to clients' respective investment policies and risk tolerance levels. All accounts at RHF are assigned to this reviewer.

Robo-advisory portfolio management accounts are not reviewed by RHF, save for automated allocation revisions. Clients are encouraged to update RHF of any change in their objectives, risk tolerance, or other pertinent information.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Nicole Louise Roberts, CCO. 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).

Robo-advisory portfolio management accounts do not undergo non-periodic review by RHF, allocations will change in accordance with the portfolio management software utilized by RHF and changes to the client's profile.

With respect to financial plans, RHF's services will generally conclude upon delivery of the financial plan.

C. Content and Frequency of Regular Reports Provided to Clients

Each client of RHF'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 directly 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)

Axos Advisor Services: RHF utilizes the services of Axos as a qualified custodian. Axos offers independent advisors services which include custody of securities, trade execution, clearance and settlements of transactions.

TD Ameritrade: RHF 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. RHF receives some benefits from TD Ameritrade through its participation in the Program.

As disclosed above, RHF participates in TD Ameritrade's institutional advisor program and RHF may recommend TD Ameritrade to clients for custody and brokerage services. There is no direct link between RHF's participation in the Program and the investment advice it gives to its clients, although RHF 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 RHF 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 RHF'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 RHF by third party vendors. TD Ameritrade may also pay for business consulting and professional services received by RHF's related persons. Some of the products and services made available by TD Ameritrade through the Program may benefit RHF but may not benefit its client accounts. These products or services may assist RHF in managing and administering client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help RHF manage and further develop its business enterprise. The benefits received by RHF 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, RHF endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by RHF or its related persons in and of itself creates a conflict of interest and may indirectly influence the RHF's choice of TD Ameritrade for custody and brokerage services.

Charles Schwab & Co., Inc. Advisor Services provides RHF 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 RHF 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.

Charles Schwab & Co., Inc. Advisor Services also makes available to RHF other products and services that benefit RHF but may not benefit its clients' accounts. These benefits may include national, regional or RHF specific educational events organized and/or sponsored by Charles Schwab & Co., Inc. Advisor Services. Other potential benefits may include occasional business entertainment of personnel of RHF by Charles Schwab & Co., Inc. Advisor 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 RHF 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 RHF'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 RHF's accounts. Charles Schwab & Co., Inc. Advisor Services also makes available to RHF other services intended to help RHF 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. Advisor Services may make available, arrange and/or pay vendors for these types of services rendered to RHF by independent third parties. Charles Schwab & Co., Inc. Advisor 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 RHF. RHF is independently owned and operated and not affiliated with Charles Schwab & Co., Inc. Advisor Services.

Betterment: RHF will receive a non-economic benefit from Betterment Institutional and Betterment Securities in the form of the support products and services it makes available to RHF (and other independent investment advisers whose clients maintain their accounts at Betterment Securities). These products and services, how they benefit RHF, and the

related conflicts of interest are described above - see Item 12. The availability of Betterment Institutional and Betterment Securities' products and services to RHF is not based on RHF giving particular investment advice, such as buying particular securities for its clients.

Dimensional Funds Advisor: RHF will received non-economic and economic benefits from DFA in the form of services, products, continuing education, webinars, and sponsorship of RHA events. These services are designed to assist RHA plan and design its services for business growth.

RHF does not pay more for investment transactions effected and or assets maintained at custodians listed above as a result of the arrangements between them. There is no corresponding commitment made by RHF to a custodian or DFA, or to any other entity, to invest any specific amount of percentage of client assets in any specific mutual funds, securities or other investment products as a result of the above arrangements.

B. Compensation to Non – Advisory Personnel for Client Referrals

RHF compensates SmartAsset as a lead generator for advisory referrals. SmartAsset complies with the SEC Promoter rules and regulations. RHF will provide data to SmartAsset that may match certain clients with the services of RHF. Compensation will be paid by RHF for referrals, and the fee for referrals will be properly disclosed to any potential clients of RHF in accordance with the Promoter Agreement entered into between the parties.

Item 15: Custody

RHF does not take physical custody over Client's cash or securities. However, the Firm is deemed to have custody in certain situations under guidance issued by the SEC. Specifically, pursuant to the Investment Advisers Act of 1940, the Firm is deemed to have "constructive custody" of Client funds because we have the authority and ability to debit our fees directly from the accounts of those Clients receiving our services. Additionally, certain Clients have, and could in the future, sign a Standing Letter of Authorization ("SLOA") that gives us the authority to transfer funds to a third-party as directed by the Client in the SLOA. This is also deemed to give us custody. Custody is defined as any legal or actual ability by the firm to withdraw client funds or securities. Firms with deemed custody must take the following steps:

1. Ensure clients' managed assets are maintained by a qualified custodian.
2. Have a reasonable belief, after due inquiry, that the qualified custodian will deliver an account statement directly to the client at least quarterly.
3. Confirm that account statements from the custodian contain all transactions that took place in the client's account during the period covered and reflect the deduction of advisory fees.

4. Obtain a surprise audit by an independent accountant on the clients' accounts for which the advisory firm is deemed to have custody.

However, the rules governing the direct debit of client fees and SLOAs exempts us from the surprise audit rules if certain conditions (in addition to steps 1 through 3 above) are met. Those conditions are as follows:

1. When debiting fees from client accounts, we must receive written authorization from clients permitting advisory fees to be deducted from the client's account.

2. In the case of SLOAs, we must: (i) confirm that the name and address of the third party is included in the SLOA, (ii) document that the third-party receiving the transfer is not related to our firm, and (ii) ensure that certain requirements are being performed by the qualified custodian.

The qualified custodian that is selected by a client maintains actual physical custody of client assets. Client account statements from custodians will be sent directly to each client to the email or postal mailing address that is provided to the qualified custodian selected by the client. Clients are encouraged to compare information provided in reports or statements received by our firm with the account statements received from their custodian for accuracy. In addition, clients should understand that it is their responsibility, not the custodian's, to ensure that the fee calculation is correct.

If client funds or securities are inadvertently received by our firm, they will be returned to the sender immediately, or as soon as practical.

We encourage our clients to raise any questions with us about the custody, safety, or security of their assets. The custodians we do business with will send Clients independent account statements listing your account balance(s), transaction history and any fee debits or other fees taken out of your account.

Item 16: Investment Discretion

RHF 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, RHF 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.

Betterment uses algorithms to advise clients and manage their accounts. These algorithms are developed, overseen, and monitored by Betterment's investment advisory personnel. To use Betterment's investment services, Clients inform Betterment of their financial goals and personal information through Betterment's online applications, and Betterment's algorithm then recommends and builds a portfolio of exchange traded funds for each of the client's financial goals and account types. Each portfolio is associated with a target allocation of investment types

and/or asset classes but you can modify Betterment's initial allocation recommendation as you see fit. RHF may modify the portfolio based on Client profile and goals.

Item 17: Voting Client Securities (Proxy Voting)

RHF does not vote proxies for client securities under management.

Item 18: Financial Information

A. Balance Sheet

RHF 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

In light of the COVID-19 coronavirus and historic decline in market values, RHF has elected to participate in the CARES Act's Paycheck Protection Program ("PPP") to strengthen its balance sheet. RHF intends to use this loan predominantly to continue payroll for the firm and may ultimately seek loan forgiveness per the terms of the PPP. Due to this and other measures taken internally, RHF has been able to operate and continue serving its clients.

C. Bankruptcy Petitions in Previous Ten Years

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