

# **Reatherford Wealth Management LLC**

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This Brochure provides information about the qualifications and business practices of Reatherford Wealth Management LLC ("Reatherford Wealth Management", "RWM", "us", "we", "our"). If you have any questions about the contents of this Brochure, please contact us at (309) 431-5380 or via email at <a href="mailto:collin@reatherfordwealthmgmt.com">collin@reatherfordwealthmgmt.com</a>. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority.

Additional information about Reatherford Wealth Management is also available via the SEC's website <a href="www.adviserinfo.sec.gov">www.adviserinfo.sec.gov</a>. You can search this site by using a unique identifying number, known as a CRD number. The CRD number for Reatherford Wealth Management is 318975. The SEC's website also provides information about any persons affiliated with Reatherford Wealth Management who are registered, or are required to be registered, as Investment Adviser Representatives of Reatherford Wealth Management.

Reatherford Wealth Management is a Registered Investment Adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information that you may use to determine whether to hire or retain them.

### **Item 2 - Material Changes**

On an ongoing basis, this item will discuss only specific material changes that are made to the Brochure and provide Clients with a summary of such changes. Reatherford Wealth Management, LLC ("RWM" or "Firm") will also reference the date of its last annual update of the Brochure. RWM will provide clients with a new Brochure as necessary based on changes or new information, at any time, without charge. Since our last annual amendment filing in March 2023, we have made one material change which is detailed below:

• RWM amended its fee schedule effective May 1, 2023. Please see Item 5 of this brochure for details of the change.

Currently, RWM's Brochure may be requested by contacting Collin Reatherford by phone at (309) 431-5380 or via email at collin@reatherfordwealthmgmt.com.

Additional information about RWM is also available via the SEC's Web site at www.adviserinfo.sec.gov. The SEC's Web site also provides information about any persons affiliated with RWM who are registered, or are required to be registered, as investment adviser representatives of RWM.

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### Item 4 - Advisory Business Introduction

### **Firm Description**

Reatherford Wealth Management is a registered investment adviser with the State of Illinois, Indiana, Texas, and other jurisdictions where exempted. As a registered investment adviser, we are held to a Fiduciary Standard of Care, legally and ethically required to act in your best interest. The Fiduciary Standard of Care is a duty to prioritize your interests ahead of our own, to provide transparency, avoid, and disclose conflicts of interest.

Reatherford Wealth Management is an Illinois limited liability company located in Peoria, Illinois. The firm was founded in 2022 by its sole owner, Collin Reatherford.

### **Advisory Services**

Reatherford Wealth Management offers a wide range of services for its clients, including asset management, comprehensive financial planning, and consulting services for high net worth individuals, families, and small businesses by helping them plan, build, and protect their assets to help achieve their personal and financial goals. The services we provide may vary depending on the complexity of the client's goals and financial situation. The following is a summary of the services we provide.

#### FINANCIAL PLANNING & CONSULTING

### **Comprehensive Financial Planning**

Comprehensive Financial Planning is a process that involves an evaluation of a Client's current and future financial state by using currently known variables to predict future cash flows, asset values, and withdrawal plans. The key defining aspect of financial planning is that through the financial planning process, all questions, information, and analysis will be considered as they affect and are affected by the entire financial and life situation of the Client.

It is essential that you provide the information and documentation we request regarding your income, investments, taxes, insurance, estate plan, etc. We will discuss your investment objectives, needs and goals, but you are obligated to inform us of any changes. We do not verify any information obtained from you, your attorney, accountant, or other professionals.

If you engage us to perform these services, you will receive a written agreement detailing the services, fees, terms, and conditions of the relationship. You will also receive this Brochure. You are under no obligation to implement recommendations through us. You may implement your financial plan through any financial organization of your choice. If you decide to implement our recommendations, we will help you open a custodial account(s). The funds in your account will generally be held in a separate account, in your name, at an independent custodian, and not with us. We recommend using Charles Schwab.

In general, the financial planning process will address some or all of the following areas of concern. These areas may include, but are not limited to, the following:

Cash Flow and Debt Management: We prepare cash flow projections by analyzing clients'
current income, expenses, taxes, and debt recommending specific courses of action about the
steps necessary to fund clients' various financial objectives. We may also recommend what we
believe to be an appropriate cash reserve that should be considered for emergencies and other
financial goals, along with a review of accounts (such as money market funds) for such reserves,
plus strategies to save desired amounts.

- Business Planning: We provide consulting services for clients who currently operate their own business, are considering starting a business, or are planning for an exit from their current business. Under this type of engagement, we work with you to assess your current situation, identify your objectives, and develop a plan aimed at achieving your goals.
- Major Purchase Planning: Analysis may be provided to consider various payment options for major purchases. For example, we may calculate the costs and cash flow flexibility of various mortgage or auto loan financing options, review cash flow implications, and ensure that an adequate down payment is aligned for stability and liquidity within the respective investment accounts.
- Capital Needs Assessment: Often the success of a financial plan can be affected by a death or
  disability occurring within a family. We evaluate the amount of life or disability insurance, if any,
  clients may need to support client goals in such situations.
- Education Funding Analysis: Includes projecting the amount that will be needed to achieve
  clients' education funding goals for children or grandchildren, along with savings strategies, and if
  needed, reviewing your financial picture as it relates to eligibility for financial aid.
- **Employee Benefits Analysis:** Whether you are an employee, corporate executive, or a business owner, we will review available strategies to help maximize your options such as:
  - Analyze client savings plans, stock options, restrictive stock agreements, deferred compensation, retirement plans, and other employee benefits.
  - Develop strategies to coordinate clients' employee benefits plans with their other financial planning, asset allocation, and investment strategies.
  - Assist in determining whether SEP or Simple IRAs are appropriate for them or for their employees.
- **Retirement Planning:** Our retirement planning services typically include projections of your likelihood of achieving your financial goals, typically focusing on financial independence as the primary objective. For situations where projections show less than the desired results, we may make recommendations, including those that may impact the original projections by adjusting certain variables (e.g., working longer, saving more, spending less, taking more risk with investments).
  - If you are near retirement or already retired, advice may be given on appropriate distribution strategies to minimize the likelihood of running out of money or having to adversely alter spending during your retirement years.
- Tax Planning Strategies: Advice may include ways to minimize current and future income taxes as a part of your overall financial planning picture. For example, we may make recommendations on which type of account(s) or specific investments should be owned based in part on their "tax efficiency," with the consideration that there is always a possibility of future changes to federal, state, or local tax laws and rates that may impact your situation.
  - We recommend that you consult with a qualified tax professional before initiating any tax planning strategy, and we may provide you with contact information for accountants or attorneys who specialize in this area if you wish to hire someone for such purposes. We will participate in meetings or phone calls between you and your tax professional with your approval.

- Investment Analysis: This may involve developing an asset allocation strategy to meet clients' financial goals and risk tolerance, providing information on investment vehicles and strategies, reviewing employee stock options, and employee retirement plan investment options, as well as assisting you in establishing your own investment account at a selected broker/dealer or custodian. The strategies and types of investments we may recommend are further discussed in Item 8 of this brochure.
- Asset Protection Planning: We review asset protection and risk management strategies
  appropriate for clients' consideration. This includes evaluating the need for long-term care
  coverage, liability insurance coverage, discussing identity theft protection, and reviewing credit
  ratings or reports.
- **Estate Planning:** This usually includes an analysis of your exposure to estate taxes and your current estate plan, which may include whether you have a will, powers of attorney, trusts, and other related documents. Our advice also typically includes ways for you to minimize or avoid future estate taxes by implementing appropriate estate planning strategies such as the use of applicable trusts.

We always recommend that you consult with a qualified attorney when you initiate, update, or complete estate planning activities. We may provide you with contact information for attorneys who specialize in estate planning when you wish to hire an attorney for such purposes. From time-to-time, we will participate in meetings or phone calls between you and your attorney with your approval or request.

**Ongoing Financial Planning and Consulting.** This service involves working one-on-one together over an extended period of time to provide ongoing financial planning analysis, advice, implementation, and any adjustments to their plan as needed as they progress towards their financial goals. The planner will routinely monitor the plan, recommend any changes, and ensure the plan is up to date.

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 actionable 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. This includes updated information to help complete the following areas of analysis: net worth, cash flow, insurance, credit scores/reports, employee benefits, retirement planning, insurance, investments, college planning, and estate planning. Any needed updates will be implemented at that time.

While Reatherford Wealth Management endeavors at all times to put the interest of our clients first as part of our fiduciary duty, the possibility of receiving additional compensation based on the recommendations made creates a conflict of interest and may affect Reatherford Wealth Management's judgment when making recommendations. We require that all investment adviser representatives disclose this conflict of interest when such recommendations are made, and that the client is not obligated to implement the recommendations made within the plan through Reatherford Wealth Management.

Client understands that Reatherford Wealth Management is not a law firm, and that the advice we provides is not legal advice. Similarly, Reatherford Wealth Management is not an accounting firm, and the advice is not accounting or tax advice. Client will rely on the advice of its own attorneys and accountants for legal, tax, accounting, and valuation matters.

#### ASSET MANAGEMENT

### **Investment Management Services (RWM manages accounts)**

As part of the investment management process, we will meet with you to discuss your financial circumstances, investment goals and objectives, and to determine your risk tolerance. We will ask you to provide statements summarizing current investments, income and other earnings, recent tax returns, retirement plan information, other assets and liabilities, wills and trusts, insurance policies, and other pertinent information.

Based on the information you share with us; we will analyze your situation and tailor a portfolio with appropriate asset allocations and investment strategies. Our recommendations and ongoing management are based upon your investment goals, objectives, and risk tolerance. Periodically, your account may need to be rebalanced or reallocated in order to reestablish the targeted percentages of your initial asset allocation. We will routinely evaluate your asset allocation and adjust as necessary to keep it in line with your goals and risk tolerance as necessary.

\* Please note that pursuant to the investment advisory agreement you are obligated to notify us promptly when your financial situation, goals, objectives, or needs change. \*

You shall not have the ability to impose restrictions on the management of your account.

Under certain conditions, securities from outside accounts may be transferred into your advisory account; however, we may recommend that you sell any security if we believe that it is not suitable for the current recommended investment strategy. Additionally, trading may be required to meet initial allocation targets, after substantial cash deposits that require investment allocation, and/or after a request for a withdrawal that requires liquidation of a position.

You will be responsible for all tax consequences resulting from the sale of any security, rebalancing, or reallocation of the account. You are responsible for any taxable events in these instances. We are not tax professionals and do not give tax advice. However, we will work with your tax professionals to assist you with tax planning.

You will be notified of any purchases or sales through trade confirmations and statements that are provided by the custodian. These statements list the total value of the account, itemize all transaction activity, and list the types, amounts, and total value of securities held. You will at all times maintain full and complete ownership rights to all assets held in your account, including the right to withdraw securities or cash, proxy voting and receiving transaction confirmations.

#### **Investment Advisory Services (Outside Managers & Sub-Advisers)**

We offer investment advisory services through use of third-party money managers ("Outside Managers" and "Sub-Advisers) for portfolio management services. We assist clients in selecting an appropriate allocation model, completing the Outside Manager's investor profile questionnaire, interacting with the Outside Manager, and reviewing the Outside Manager. Our review process and analysis of outside managers is further discussed in Item 8 of this Form ADV Part 2A. You should read the ADV Part 2 disclosure document of the money manager you select for complete details on the charges and fees you will incur. 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.

#### **Wrap Fee**

The Adviser does not sponsor or participate in a third-party sponsored wrap fee program.

#### **Assets Under Management**

As of the date of this ADV Part 2 Brochure we have \$8,480,834 in discretionary assets under management.

#### **Asset Management Fee Schedule**

Reatherford Wealth Management does not impose a minimum account balance for the opening of an account with the Adviser. The fee charged is based upon the amount of money invested. Multiple accounts of immediately related family members, at the same mailing address, may be considered one consolidated account for billing purposes. Fees are charged quarterly in arrears. Payments are due and will be assessed on the last day of each quarter, based on the previous quarter's average daily balance of the account(s) under management for the preceding quarter. The Adviser will not pro rate for deposits and withdrawals in the account during the billing period although the average daily balance will reflect such deposits and withdrawals. The Advisory Fee is based upon assets under management calculated as follows:

AUM	Annual Fee Percent
<u>\$0.00 - \$500,000.00</u>	<u>1.00%</u>
<u>\$500,000.00 - \$1,000,000.00</u>	<u>0.80%</u>
\$1,000,000.00 - \$3,000,000.00	<u>0.60%</u>
\$3,000.000.00 - \$10,000,000.00	<u>0.50%</u>
Above \$10,000,000.00	0.30%

#### Example fee calculation

AUM x %/4 = Total fee

The fees shown above are annual fees and may be negotiable based upon certain circumstances. No increase in the annual fee shall be effective without prior written notification. Reatherford Wealth Management believes the advisory fee is reasonable considering the fees charged by other investment advisers offering similar services/programs.

The Client agrees to authorize the Custodian to pay directly to Reatherford Wealth Management upon receipt of notice, the Account's investment advisory services fee. Fee withdrawals will occur no more frequently than quarterly from the Client's Account, unless specifically instructed otherwise by the Client.

The Custodian will send to the Client a statement, at least quarterly, indicating all amounts disbursed from the Account, including the fee paid directly to Reatherford Wealth Management. Reatherford Wealth Management's access to the Assets of the Account will be limited to trading and the withdrawals authorized above. Additionally, Reatherford Wealth Management will send to the Client an invoice reflecting the amount of the fee, the previous quarter's ending balance for the Client's Account on which the fee was based, and the specific manner in which the fee was calculated.

If you do not want us to charge your account for the fee, you may pay the fee directly to us. We will send you an invoice detailing the fee calculation. Fees are due in full 15 days after receipt of the invoice. Our fees do not include custodial fees, brokerage commissions, transaction costs or other expenses charged by the client's custodian or broker. Please see Item 12 for information on our brokerage practices. Each

investment vehicle (e.g., mutual fund or ETF) in which a client's assets may be invested charges its own advisory fee and other fees and expenses ("internal expenses"), which are set forth in the applicable fund's prospectus.

### **Financial Planning Fees**

Financial planning services will be offered on an hourly basis of \$250.00 per hour or on a fixed fee basis. The fixed fee will be based upon the complexity of the plan and will range from \$500.00 to \$15,000.00, which may be negotiable depending upon the nature and complexity of the client's circumstances. A deposit of 50% of the fee is due at the time the agreement is signed. The remainder of the fee is due upon presentation of an investment plan or the rendering of consulting services. Investment plans will be presented to you within 90 days of the contract date, provided that all information needed to prepare the investment plan has been promptly provided to us.

The Financial Planning Agreement will show the fee you will pay. We do not accept prepayment of more than \$500 in fees per client, six months or more in advance. The financial planning agreement will terminate once you receive the final plan.

If the plan is implemented through us, we may receive compensation from the sale of insurance products or advisory services recommended in the financial plan. This compensation would be in addition to the financial planning fee you pay. The fees and expenses you pay for the purchase of these products may be more or less than the expenses you would pay should you decide to implement our recommendations through another investment advisory firm or broker-dealer and are typically determined by the broker-dealer or investment company sponsoring the product. Therefore, a conflict of interest may exist between our interests and your interests since we may recommend products that pay us compensation. We may have an incentive to recommend particular products based upon the potential compensation rather than your needs. This potential conflict is addressed in our Code of Ethics.

Based upon your needs, we may also provide consultations throughout the year to advise and counsel you about other financial issues. We can help you with transition planning, major transaction analysis, coordinated with cash flow needs, retirement needs, estate planning needs, income tax planning, life and disability insurance needs, investment needs, and college education planning.

All recommendations developed by us are based upon our professional judgment. We cannot guarantee the results of any of our recommendations.

### **Other Compensation**

Our IARs may recommend and sell life, disability, health, and long-term care insurance and will receive the usual and customary commissions in addition to any agreed upon advisory fee.

The Firm's IAR's may receive additional compensation from sales of insurance products and may be eligible to receive incentive awards (including prizes such as trips or bonuses) for recommending certain types of insurance policies.

While the Firm and its IARs endeavor at all times to put the interest of our clients first as part of our fiduciary duty, the possibility of receiving incentive awards creates a conflict of interest and may affect our judgment when making recommendations. We require that all IARs disclose this conflict of interest when such recommendations are made. Also, we require IARs to disclose that Clients may purchase recommended insurance products from other insurance agents not affiliated with us.

### Item 6 - Performance Based Fee and Side by Side Management

We do not charge any performance-based fees.

### Item 7 – Types of Client(s)

We provide investment advisory services to individuals, high net worth individuals, and small businesses.

### Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss

### **Methods of Analysis**

Our investment management approach encompasses a variety of analytical methods. When offering investment advisory services, we may employ any, all, or a mix of these techniques as part of our comprehensive investment strategy:

#### **Modern Portfolio Theory (MPT)**

We use Modern Portfolio Theory to help select the funds we use in your account.

Modern portfolio theory tries to understand the market as a whole, rather than looking for what makes each investment opportunity unique. Investments are described statistically, in terms of their expected long-term return rate and their expected short-term volatility. The volatility is equated with "risk," measuring how much worse than average an investment's bad years are likely to be. The end goal is to identify your acceptable level of risk tolerance, and then to find a portfolio with the maximum expected return for that level of risk.

#### **Economic Analysis and Stress Testing**

Stress testing is a risk management tool and analysis used to simulate an economic crisis and determine if this event could impact a client's assets. By implementing a stress test, we are able to identify potential worst-case scenarios in order to manage a client's exposure to risk. Based on the results of stress testing, we can take strategic actions such as adjusting economic capital levels or adjusting portfolio mix, which might result in enhanced economic returns.

#### **Fundamental Analysis**

Fundamental analysis is a technique that attempts to determine a security's value by focusing on the underlying factors that affect a company's actual business and its future prospects. Fundamental analysis is about using real data to evaluate a security's value. It refers to the analysis of the economic well-being of a financial entity as opposed to only its price movements.

The end goal of performing fundamental analysis is to produce a value that we can compare with the security's current price, with the aim of figuring out what sort of position to take with that security (underpriced = buy, overpriced = sell or short).

#### **Technical Analysis**

Technical Analysis is a technique that attempts to determine a security's value by developing models and trading rules based upon price and volume transformation. Technical analysis assumes that a market's

price reflects all relevant information, so the analysis focuses on the history of a security's trading behavior rather than external drivers such as economic, fundamental and news events. The practice of technical analysis incorporates the importance of understanding how market participants perceive and act upon relevant information rather than focusing on the information itself. Ultimately, technical analysts develop trading models and rules by evaluating factors such as market trends, market participant behaviors, supply and demand and pricing patterns and correlations.

As with other types of analysis, the predictive nature of technical analysis can vary greatly; models and rules are often modified and updated as new patterns and behaviors develop. Past performance is not an indicator of future return.

#### **Cyclical Analysis**

While we do not attempt to time the market, we may use cyclical analysis in conjunction with other strategies to help determine if shifts are required in your investment strategies depending upon long and short-term trends in financial markets and the performance of the overall national and global economy.

### **Charting Analysis**

Charting analysis is a method utilized to perform analysis and forecasting of the stock market or commodity market prices and trends. Some of the charts that are used for the analysis are bar charts, point-and-finger charts, and candlestick charts. The charts are used to plot factors such as average price movement, highs and lows of prices, open interest, settlement prices and volume trading.

As with other types of analysis, the predictive nature of charting analysis can vary greatly; models and rules are often modified and updated as new patterns and behaviors develop. Past performance is not an indicator of future returns.

### **Investment Strategies**

When determining appropriate investment strategies, we use a number of factors, including those derived from academic research and literature, commercially available software technology, securities rating services, general market and financial information, as well as a thorough due diligence process for securities including, but not limited to, a securities historical return, date of inception, expense ratios, tax efficiency, turnover ratio, tracking error, its historical and expected volatility, and the relationship (or correlation) with respect to other securities and asset classes.

Reatherford Wealth Management generally employs a long-term asset allocation strategy to construct investment portfolios which meet the investment goals, objectives, needs, and risk tolerance of each client. Asset allocation involves determining an appropriate percentage to invest in a variety of asset classes. The diversification afforded by appropriate asset allocation helps balance the risks and rewards of investing. We believe in diversified asset class exposure using some combination of the following types of securities:

- U.S. Stocks of any market capitalization
- International and emerging markets stocks
- U.S. and non-U.S. fixed income securities
- Real estate investment trusts ("REITs") (domestic and foreign)
- Private and alternative investments
- Option writing, including covered options, uncovered options, or spreading strategies, or futures in order to gain exposure to a particular asset group or for hedging purposes.

We use certain strategies to regularly attempt to control portfolio risk. Methods such as routinely rebalancing positions to maintain a desired percentage of a positions weighting in the portfolio, to meet a certain asset allocation, or for cash management purposes.

Reatherford Wealth Management understands long-term investment success means different things to different people. We believe the best investment plan for a client depends on the client's specific circumstances and objectives. That is why we begin the investment planning process with a Discovery Meeting to have a conversation about the client's values, goals, relationships, assets, types of accounts, advisors, preferred processes, and interests.

#### **Risk of Loss**

Investing in securities involves a risk of loss that you should be prepared to bear. Reatherford Wealth Management cannot guarantee that it will achieve a client's investment objective. You need to understand that investment decisions made for your account by us are subject to various market, currency, economic, political, and business risks.

A list of all risks associated with the strategies, products, and methodology we offer are listed below:

**Market Risk:** Market risk involves the possibility that an investment's current market value will fall because of a general market decline, reducing the value of the investment regardless of the operational success of the issuer's operations or its financial condition.

**Strategy Risk:** The Adviser's investment strategies and/or investment techniques may not work as intended.

**Small and Medium Cap Company Risk:** Securities of companies with small and medium market capitalizations are often more volatile and less liquid than investments in larger companies. Small and medium cap companies may face a greater risk of business failure, which could increase the volatility of the client's portfolio.

**Turnover Risk:** At times, the strategy may have a portfolio turnover rate that is higher than other strategies. A high portfolio turnover would result in correspondingly greater brokerage commission expenses and may result in the distribution of additional capital gains for tax purposes. These factors may negatively affect the account's performance.

**Limited Markets:** Certain securities may be less liquid (harder to sell or buy) and their prices may at times be more volatile than at other times. Under certain market conditions we may be unable to sell or liquidate investments at prices we consider reasonable or favorable or find buyers at any price.

**Concentration Risk:** Certain investment strategies focus on particular asset-classes, industries, sectors, or types of investment. From time to time these strategies may be subject to greater risks of adverse developments in such areas of focus than a strategy that is more broadly diversified across a wider variety of investments.

**Interest Rate Risk:** Bond (fixed income) prices generally fall when interest rates rise, and the value may fall below par value or the principal investment. The opposite is also generally true: bond prices generally rise when interest rates fall. In general, fixed income securities with longer maturities are more sensitive to these price changes. Most other investments are also sensitive to the level and direction of interest rates.

**Legal or Legislative Risk:** Legislative changes or Court rulings may impact the value of investments, or the securities' claim on the issuer's assets and finances.

**Inflation:** Inflation may erode the buying-power of your investment portfolio, even if the dollar value of your investments remains the same.

**Modern Portfolio Theory (MPT) Risk:** Modern Portfolio Theory tries to understand the market as a whole and measure market risk in an attempt to reduce the inherent risks of investing in the market. However, with every financial investment strategy there is a risk of a loss of principal. Not every investment decision will be profitable, and there can be no guarantee of any level of performance.

**Fundamental Analysis Risk:** Fundamental analysis has a number of risks to consider such as; there are an infinite number of factors that can affect the earnings of a company, and its stock price, over time. These can include economic, political, and social factors, in addition to the various company statistics. In addition, the data used may be out of date, it is difficult to give appropriate weightings to the factors, it assumes that the analyst is competent, and it ignores the influence of random events such as oil spills, product defects being exposed, and acts of God and so on.

**Technical Analysis Risk:** Technical analysis is derived from the study of market participant behavior and its efficacy is a matter of controversy. Therefore, methods vary greatly and can be highly subjective; different technical analysts can sometimes make contradictory predictions from the same data, as well as models and rules can incur sufficiently high transaction costs.

**Cyclical Analysis Risk:** Looking at market cycles in conjunction with other investment strategies can be useful when making investment decisions. However, market cycles are not always predictable. Each financial investment strategy has benefits and risks. Not every investment decision will be profitable, and there can be no guarantee of any level of performance.

#### **Risks Associated with Securities**

Apart from the general risks outlined above which apply to all types of investments, specific securities may have other risks.

**Equity Risk:** Equity securities tend to be more volatile than other investment choices. The value of an individual equity can be more volatile than the market. They may go up and down in price quite dramatically, and in the event of an issuer's bankruptcy or restructuring could lose all value. A slower-growth or recessionary economic environment could have an adverse effect on the price of all stocks.

**Foreign Securities Risk:** Funds in which clients invest may invest in foreign securities. Foreign securities are subject to additional risks not typically associated with investments in domestic securities. These risks may include, among others, currency risk, country risks (political, diplomatic, regional conflicts, terrorism, war, social and economic instability, currency devaluations and policies that have the effect of limiting or restricting foreign investment or the movement of assets), different trading practices, less government supervision, less publicly available information, limited trading markets and greater volatility.

**Fixed Income Risk:** The issuer of a fixed income security may not be able to make interest and principal payments when due. Generally, the lower the credit rating of a security, the greater the risk that the issuer will default on its obligation. If a rating agency gives a debt security a lower rating, the value of the debt security may decline because investors demand a higher rate of return. As nominal interest rates rise, the value of fixed income securities is likely to decrease. A nominal interest rate is the sum of a real interest rate and an expected inflation rate.

**Mutual Fund Risk:** Mutual Funds invest in a broad range of equity and fixed income securities, including foreign securities and securities of issuers located in emerging markets. The funds may also invest in equity securities of any market capitalization including micro-, small-, and mid-cap companies, real estate, commodities-related assets, fixed income securities of any maturity or credit quality, including high-yield,

high-risk debt securities, ETFs, other mutual funds, money market funds and they may engage in leveraged or derivative transactions. We have no control over the investment strategies, policies, or decisions of the mutual funds and, in the event of dissatisfaction with such a fund, our only option would be to liquidate clients' investments in that fund.

**Exchange Traded Fund ("ETF") Risk:** ETFs invest in equities, bonds, and other financial vehicles. ETFs are investment companies whose shares are bought and sold on a securities exchange. An ETF holds a portfolio of securities designed to track a particular market segment or index. Investing in ETFs involves risk. Specifically, ETFs, depending on the underlying portfolio and its size, can have wide price (bid and ask) spreads, thus diluting or negating any upward price movement of the ETF or enhancing any downward price movement. Also, ETFs require more frequent portfolio reporting by regulators and are thereby more susceptible to actions by hedge funds that could have a negative impact on the price of the ETF. Certain ETFs may employ leverage, which creates additional volatility and price risk depending on the amount of leverage utilized, the collateral, and the liquidity of the supporting collateral. Further, the use of leverage (i.e., employing the use of margin) generally results in additional interest costs to the ETF. Certain ETFs are highly leveraged and therefore have additional volatility and liquidity risk. Volatility and liquidity can severely and negatively impact the price of the ETF's underlying portfolio securities, thereby causing significant price fluctuations of the ETF.

Real Estate Investment Trust ("REIT") Risk: Funds in which clients invest may invest in Real Estate Investment Trusts ("REITs"), they are subject to risks generally associated with investing in real estate, such as (i) possible declines in the value of real estate, (ii) adverse general and local economic conditions, (iii) possible lack of availability of mortgage funds, (iv) changes in interest rates, and (v) environmental problems. In addition, REITs are subject to certain other risks related specifically to their structure and focus such as: dependency upon management skills; limited diversification; the risks of locating and managing financing for projects; heavy cash flow dependency; possible default by borrowers; the costs and potential losses of self-liquidation of one or more holdings; the possibility of failing to maintain exemptions from securities registration; and, in many cases, relatively small market capitalization, which may result in less market liquidity and greater price volatility.

**U.S. Government Securities:** Funds in which clients invest may invest in U.S. government securities. U.S. government securities include securities issued by the U.S. Treasury and by U.S. government agencies and instrumentalities. U.S. government securities may be supported by the full faith and credit of the United States.

**Municipal Securities:** Funds in which clients invest may invest in municipal securities. Municipal securities carry different risks than those of corporate government and bank- sponsored debt securities described above. These risks include the municipality's ability to raise additional tax revenue or other revenue (in the event the bonds are revenue bonds) to pay interest on its debt and to retire its debt at maturity. Municipal bonds are generally tax-free at the federal level but may be taxable in individual states other than the state in which both the investor and municipal issuer are domiciled.

**Certificates of Deposit:** Certificates of deposit are generally considered safe instruments, although they are subject to the level of general interest rates, the credit quality of the issuing bank, and the length of maturity. With respect to certificates of deposit, depending on the length of maturity, there can be prepayment penalties if the client needs to convert the certificate of deposit to cash prior to maturity.

**Options and Other Derivatives:** Options carry many unique risks, including time-sensitivity, and can result in the complete loss of principal. While covered call writing does provide a partial hedge to the stock against which the call is written, the hedge is limited to the amount of cash flow received when writing the option. When selling covered calls, there is a risk the underlying position may be called away at a price lower than the current market price.

**Insurance Product Risk:** The rate of return on variable insurance products is not stable, but varies with the stock, bond, and money market subaccounts that you choose as investment options. There is no guarantee that you will earn any return on your investment and there is a risk that you will lose money. Before you consider purchasing a variable product, make sure you fully understand all of its terms. Carefully read the prospectus. Some of the major risks include:

- Liquidity and Early Withdrawal Risk: There may be a surrender charge for withdrawals within a specified period, which can be as long as six to eight years. Any withdrawals before a client reaches the age of 59 ½ are generally subject to a 10 percent income tax penalty in addition to any gain being taxed as ordinary income.
- Sales and Surrender Charges: Asset-based sales charges or surrender charges. These charges
  normally decline and eventually are eliminated the longer you hold your shares. For example, a
  surrender charge could start at 7 percent in the first year and decline by 1 percent per year until it
  reaches zero.
- **Fees and Expenses:** There are a variety of fees and expenses which can reach 2% and more such as:
  - Mortality and expense risk charges.
  - Administrative fees.
  - Underlying fund expenses.
  - Charges for any special features or riders.
- Bonus Credits: Some products offer bonus credits that can add a specified percentage to the
  amount invested ranging from 1 percent to 5 percent for each premium payment. Bonus credits,
  however, are usually not free. In order to fund them, insurance companies typically impose high
  mortality and expense charges and lengthy surrender charge periods.
- **Guarantees:** Insurance companies provide a number of specific guarantees. For example, they may guarantee a death benefit or an annuity payout option that can provide income for life. These guarantees are only as good as the insurance company that gives them.

**General Risks Associated with Investments in Private Placements:** Limited partnerships, private investment programs, and other private placements may be subject to a variety of risks, including, but not limited to, lack of operating history, reliance on key personnel of the investment program or limited partnership, absence of regulatory oversight, limited withdrawal rights, substantial fees and expenses, illiquidity of interests, and potential mandatory withdrawal. Plancorp strongly encourages clients to carefully consider the risk disclosures contained in the private placement memoranda or offering documents of any private placement.

**Illiquidity:** An investment in a private placement is illiquid and is not suitable for an investor who needs liquidity. There is no public market for interests in private placements and there are limitations on the ability to transfer such interests. When withdrawals are permitted, they may be subject to certain limitations and early withdrawal penalties.

**Concentration of Investments:** Private placements may at times have a relatively large portion of their capital exposed to a relatively small number of positions and/or a particular industry. Losses in one or more large positions, or a downturn in an industry in which private placements are concentrated, could materially adversely affect the performance of the private placements.

### Item 9 – Disciplinary Information

Registered Investment Advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of us or the integrity of our management. We do not have any information to disclose concerning Reatherford Wealth Management or any of our IARs. We adhere to high ethical standards for all IARs and associates.

### Item 10 – Other Financial Industry Activities and Affiliations

Neither Reatherford Wealth Management nor any of its management persons are registered as a broker-dealer or registered as a representative of a broker-dealer, nor does it have any pending application to register. In addition, neither Reatherford Wealth Management nor its management persons are affiliated with any broker-dealer.

Reatherford Wealth Management and its management persons are not registering as a commodity pool operator, futures commission merchant, or commodity trading advisor.

#### **Other Financial Industry Affiliations**

Collin Reatherford, the Managing Member and Chief Compliance Officer for Reatherford Wealth Management, is a licensed insurance agent/broker with various companies. The sale of these products accounts for approximately 10% of his time.

#### **Selection of Other Advisers**

Reatherford Wealth Management will be compensated by the third-party manager(s) from the advisory fees collected from the client. Details of these fees are/will be described in Item 5 – Fees and Compensation. Fees are generally 1.00% per annum. This causes a conflict of interest in recommending certain third-party managers since we may receive compensation for referring clients to these vendors. In order to mitigate this conflict of interest, we require all IARs to inform the client that they are under no obligation to implement any recommendations made by us or the third-party manager.

# Item 11 – Code of Ethics, Participation or Interest in Client Accounts and Personal Trading

#### **General Information**

We have adopted a Code of Ethics for all IAR's of the firm describing its high standards of business conduct, and fiduciary duty to you, our client. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts, the reporting of certain gifts and business entertainment items, and personal securities trading procedures. All of our IAR's must acknowledge the terms of the Code of Ethics annually, or as amended.

### **Participation or Interest in Client Accounts**

Our Compliance policies and procedures prohibit anyone associated with Reatherford Wealth Management from having an interest in a client account or participating in the profits of a client's account without the approval of the CCO.

The following acts are prohibited:

- Employing any device, scheme, or artifice to defraud
- Making any untrue statement of a material fact
- Omitting to state a material fact necessary in order to make a statement, in light of the circumstances under which it is made, not misleading
- Engaging in any fraudulent or deceitful act, practice, or course of business
- Engaging in any manipulative practices

Clients and prospective clients may request a copy of the firm's Code of Ethics by contacting the CCO.

### **Personal Trading**

We may recommend securities to you that we will purchase for our own accounts. We may trade securities in our account that we have recommended to you as long as we place our orders after your orders. This policy is meant to prevent us from benefiting as a result of transactions placed on behalf of advisory accounts.

Neither Reatherford Wealth Management nor any of its related persons recommend securities (or other investment products) to advisory clients in which we or any related person has some other proprietary (ownership) interest, other than those mentioned above.

Certain affiliated accounts may trade in the same securities with your accounts on an aggregated basis when consistent with our obligation of best execution. When trades are aggregated, all parties will share the costs in proportion to their investment. We will retain records of the trade Order (specifying each participating account) and its allocation. Completed Orders will be allocated as specified in the initial trade order. Partially filled Orders will be allocated on a pro rata basis. Any exceptions will be explained on the Order.

Reatherford Wealth Management has a personal securities transaction policy in place to monitor the personal securities transactions and securities holdings of "Access Persons." The policy requires that an Access Person of the firm provide the Chief Compliance Officer or his/her designee with a written report of their current securities holdings within ten (10) days after becoming an Access Person. Additionally, each Access Person must provide the Chief Compliance Officer or his/her designee with a written report of the Access Person's current securities holdings at least once each twelve (12) month period thereafter on a date the Adviser selects; provided, however that at any time that the Adviser has only one Access Person, he or she shall not be required to submit any securities report described above.

We have established the following restrictions in order to ensure our fiduciary responsibilities regarding insider trading are met:

 No securities for our personal portfolio(s) shall be bought or sold where this decision is substantially derived, in whole or in part, from the role of IARs of Reatherford Wealth Management, unless the information is also available to the investing public on reasonable inquiry. In no case shall we put our own interests ahead of yours.

### **Privacy Statement**

We are committed to safeguarding your confidential information and hold all personal information provided to us in the strictest confidence. These records include all personal information that we collect from you or receive from other firms in connection with any of the financial services they provide. We also require other firms with whom we deal with to restrict the use of your information. Our Privacy Policy is available upon request.

#### **Conflicts of Interest**

Reatherford Wealth Management's IARs may employ the same strategy for their personal investment accounts as it does for its clients. However, IARs may not place their orders in a way to benefit from the purchase or sale of a security.

We act in a fiduciary capacity. If a conflict of interest arises between us and you, we shall make every effort to resolve the conflict in your favor. Conflicts of interest may also arise in the allocation of investment opportunities among the accounts that we advise. We will seek to allocate investment opportunities according to what we believe is appropriate for each account. We strive to do what is equitable and in the best interests of all the accounts we advise.

### Item 12 - Brokerage Practices

#### **Factors Used to Select Custodians**

In recommending a custodian/broker-dealer, we look for a company that offers relatively low transaction fees, access to desired securities, trading platforms, and support services. We require clients use Charles Schwab as the qualified custodian for their accounts when utilizing our asset management services.

#### **Soft Dollars**

We do not receive any soft dollars from broker-dealers, custodians, or third-party money managers.

#### The Custodian and Brokers We Use

Reatherford Wealth Management does not maintain custody of your assets that we manage (although we may be deemed to have custody of your assets if you give us authority to withdraw assets from your account (see Item 15 Custody, below). Your assets must be maintained in an account at a "qualified custodian," generally a broker-dealer or bank. We require that our clients use Charles Schwab & Co., Inc. (Schwab), a FINRA-registered broker-dealer, member SIPC, as the qualified custodian. We are independently owned and operated and not affiliated with Schwab. Schwab will hold your assets in a brokerage account and buy and sell securities when [we/you] instruct them to. While we require that you use Schwab as custodian/broker, you will decide whether to do so and open your account with Schwab by entering into an account agreement directly with them. We do not open the account for you. If you do not wish to place your assets with Schwab, then we cannot manage your account. Not all advisors require their clients to use a particular broker-dealer or other custodian selected by the advisor. Even though your account is maintained at Schwab, we can still use other brokers to execute trades for your account, as described in the next paragraph.

#### **How We Select Brokers/Custodians**

We seek to use a custodian/broker who will hold your assets and execute transactions on terms that are overall most advantageous when compared to other available providers and their services. We consider a wide range of factors, including, among others, these:

- combination of transaction execution services along with asset custody services (generally without a separate fee for custody)
- capability to execute, clear and settle trades (buy and sell securities for your account)
- capabilities to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
- breadth of investment products made available (stocks, bonds, mutual funds, exchange traded funds (ETFs), etc.)
- availability of investment research and tools that assist us in making investment decisions
- quality of services

- competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate them
- reputation, financial strength, and stability of the provider
- their prior service to us and our other clients
- availability of other products and services that benefit us, as discussed below (see "Products and Services Available to Us from Schwab")

#### **Your Custody and Brokerage Costs**

For our clients' accounts it maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. In addition to [commissions [or] asset-based fees] Schwab charges you a flat dollar amount as a "prime broker" or "trade away" fee for each trade that we have executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into your Schwab account. These fees are in addition to the commissions or other compensation you pay the executing broker-dealer. Because of this, in order to minimize your trading costs, we have Schwab execute most trades for your account.

#### **Products and Services Available to Us from Schwab**

Schwab Advisor Services (formerly called Schwab Institutional) is Schwab's business serving independent investment advisory firms like us. They provide us and our clients with access to its institutional brokerage – trading, custody, reporting and related services – many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer our clients' accounts while others help us manage and grow our business. Here is a more detailed description of Schwab's support services:

- Services that Benefit You: Schwab's institutional brokerage services include access to a broad
  range of investment products, execution of securities transactions, and custody of client assets.
  The investment products available through Schwab include some to which we might not
  otherwise have access or that would require a significantly higher minimum initial investment by
  our clients. Schwab's services described in this paragraph generally benefit you and your account.
- Services that May Not Directly Benefit You: Schwab also makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts. They include investment research, both Schwab's own and that of third parties. We may use this research to service all or some substantial number of our clients' accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:
  - provide access to client account data (such as duplicate trade confirmations and account statements);
  - o facilitate trade execution and allocate aggregated trade orders for multiple client accounts;

- provide pricing and other market data;
- o facilitate payment of our fees from our clients' accounts; and
- o assist with back-office functions, recordkeeping, and client reporting.
- **Services that Generally Benefit Only Us:** Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:
  - educational conferences and events;
  - o technology, compliance, legal, and business consulting;
  - o publications and conferences on practice management and business succession; and
  - o access to employee benefits providers, human capital consultants and insurance providers.

Schwab may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab may also discount or waive its fees for some of these services or pay all or a part of a third party's fees. Schwab may also provide us with other benefits such as occasional business entertainment of our personnel.

#### **Our Interest in Schwab's Services**

The availability of these services from Schwab benefits us because we do not have to produce or purchase them. We don't have to pay for Schwab's services. These services are not contingent upon us committing any specific amount of business to Schwab in trading commissions or assets in custody. The services we receive from Schwab gives us an incentive to require that you maintain your account with Schwab based on our interest in receiving Schwab's services that benefit our business rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a potential conflict of interest. We believe, however, that our selection of Schwab as custodian and broker is in the best interests of our clients. It is primarily supported by the scope, quality, and price of Schwab's services (based on the factors discussed above – see "How We Select Brokers/Custodians") and not Schwab's services that benefit only us. We do not believe that requiring our clients to utilize Schwab presents a material conflict of interest.

#### **Best Execution**

We have an obligation to seek best execution for you. In seeking best execution, the determinative factor is not the lowest possible commission cost but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including the value of research provided, execution capability, commission rates, reputation, and responsiveness. Therefore, we will seek competitive commission rates, but we may not obtain the lowest possible commission rates for account transactions.

#### **Brokerage for Client Referrals**

In selecting and/or recommending broker-dealers, we do not take into consideration whether or not we will receive client referrals from the broker-dealer or third-party.

### **Directed Brokerage**

We do not permit directed brokerage. We will require you to use the custodian of our choosing as the custodial firm.

### **Trading**

Transactions for each client account generally will be affected independently unless we decide to purchase or sell the same securities for several clients at approximately the same time. We may (but are not obligated to) combine or "batch" such Orders to obtain best execution, to negotiate more favorable commission rates or to allocate equitably among our clients' differences in prices and commission or other transaction costs. Under this procedure, transactions will be price-averaged and allocated among our clients in proportion to the purchase and sale orders placed for each client account on any given day.

Transactions placed in an asset management account by a third-party manager will be executed through their broker-dealer or custodian. In determining best execution for these transactions, the third-party manager is looking at whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including the value of research provided, execution capability, commission rates, and responsiveness. While they look for competitive commission rates, they may not obtain the lowest possible commission rates for account transactions. The aggregation and allocation practices of mutual funds and third-party managers that we recommend to you are disclosed in the respective mutual fund prospectuses and third-party manager disclosure documents which will be provided to you.

#### Item 13 – Review of Accounts

#### **Reviews**

**Asset Management Clients:** For Asset Management clients we serve, we offer to meet at least annually to review the performance of their portfolio, their asset allocation and risk tolerance, as well as review their situation and discuss any adjustments deemed appropriate. We generally meet several times a year during the first year with a new client. Reviews will be conducted by our Chief Compliance Officer, Collin Reatherford. You may request more frequent reviews and may set thresholds for triggering events that would cause a review to take place. We will continually monitor changes and shifts in the economy, the portfolio's allocation to keep within target ranges, changes to the management and structure of a fund or the investment company in which client assets are invested, as well as market shifts and corrections.

**Financial Planning Clients:** As part of the financial planning process, there will be an initial review of the information provided by the client for the purpose of preparing for the planning process. Subsequent reviews may be scheduled as needed by the client and/or Reatherford Wealth Management up and until the final, written plan is provided to the client. Once the plan has been provided the agreement will terminate.

As stated under Item 4, ongoing consulting services may include ongoing reviews of portfolios held away from Reatherford Wealth Management, ongoing reviews of household budgeting and spending, educational savings, etc.

### **Reports**

**Asset Management Clients:** We do not provide any additional statements to clients; the only statements clients will receive are those provided by the custodian(s). We may generate and use during one-on-one reviews or provide to clients upon request.

**Financial Planning Clients:** As part of the financial planning process a written plan will be provided. Outside of the written plan, no other report will be generated or provided to the client unless requested specifically by the client.

As stated under Item 4, some consulting services will result in a written report while others will be handled through ongoing consultations between the Adviser and Client. Any written reports to be provided will be dictated by the services needed by the client.

### Item 14 – Client Referrals and Other Compensation

We do not receive any economic benefit from someone who is not a client for providing investment advice or other advisory services to our clients nor do we directly or indirectly pay any compensation to another person if they refer clients to us. The client may choose to engage a third-party money manager through the Firm. Depending upon the individual agreement with the third-party manager, the firm may bill the client for the whole fee and pay a portion to the third-party manager. Alternatively, some arrangements would involve the manager billing the client for the entire fee and sharing a portion with the Firm.

We receive an economic benefit from Schwab in the form of the support products and services it makes available to us and other independent investment advisors that have their clients maintain accounts at Schwab. These products and services, how they benefit us, and the related conflicts of interest are described above (see Item 12 – Brokerage Practices). The availability to us of Schwab's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

### Item 15 – Custody

We do not have physical custody of any accounts or assets. However, we may be deemed to have custody of your account(s) if we have the ability to deduct your advisory fees from the custodian. We require clients use Schwab as the custodian and/or broker-dealer for all your accounts. You should receive at least quarterly statements from them. We urge you to carefully review such statements and compare this official custodial record to any reports that we may provide to you. Our reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities. If you notice any discrepancies, please contact Reatherford Wealth Management or Schwab.

We do not debit the client fees directly from your advisory account. We send information to your custodian to debit your fees and to pay them to us. You authorized the custodian to pay us directly at the onset of the relationship.

Under government regulations, we are deemed to have custody of your assets if you authorize us to instruct Schwab to deduct our advisory fees directly from your account. Schwab maintains actual custody of your assets. You will receive account statements directly from Schwab at least quarterly. They will be sent to the email or postal mailing address you provided to Schwab. You should carefully review those statements promptly when you receive them. We also urge you to compare Schwab's account statements to any reports you may receive from us.

### **Standing Letter of Authorization**

Reatherford Wealth Management is deemed to have custody of client funds or securities as a result of maintaining standing letters of authorization (SLOA) for the purpose of distributing funds from a client's account. For those accounts in which we have the ability to initiate distributions from a client's account, via journal, ACH, or wire to a third-party, which is an account held in the name of someone other than the client, we will ensure the following conditions have been met in order for us to be in compliance with SEC and State Custody Rules and ensure the safe keeping of our client's funds:

- 1. The client provides an instruction to the qualified custodian, in writing, that includes the client's signature, the third-party's name, and either the third-party's address or the third-party's account number at a custodian to which the transfer should be directed.
- 2. The client authorizes the investment adviser, in writing, either on the qualified custodian's form or separately, to direct transfers to the third-party either on a specified schedule or from time to time.
- 3. The client's qualified custodian performs appropriate verification of the instruction, such as a signature review or other method to verify the client's authorization and provides a transfer of funds notice to the client promptly after each transfer.
- 4. The client has the ability to terminate or change the instruction to the client's qualified custodian.
- 5. The investment adviser has no authority or ability to designate or change the identity of the third-party, the address, or any other information about the third-party contained in the client's instruction.
- 6. The investment adviser maintains records showing that the third party is not a related party of the investment adviser or located at the same address as the investment adviser.
- 7. The client's qualified custodian sends the client, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

### Item 16 - Investment Discretion

We manage assets on a discretionary basis. You will provide us with discretion authority which will be evidenced via the written, discretionary agreement between the client and the Adviser. We will have the authority to determine the following without your consent:

- Securities to be bought or sold for your account
- Amount of securities to be bought or sold for your account.

In all cases this discretion is exercised in a manner consistent with your stated investment objectives for your account. When active asset management services are provided on a discretionary basis the client will enter into a separate custodial agreement with the custodian. The custodian agreement will include a limited power of attorney to trade in the client's account(s) which authorizes the custodian to take instructions from us regarding all investment decisions for your account.

The third-party money manager and/or custodians may have discretion over your account. The Advisory Agreement and ADV Part 2 of the third-party money manager and the custodial new account documentation will detail this in full.

### **Item 17 – Voting Client Securities**

As a matter of firm policy and practice, we do not have any authority to and do not vote proxies on behalf of advisory clients. You retain the responsibility for receiving and voting proxies for any and all securities maintained in your portfolios. We may provide advice to you regarding your voting of proxies. The custodian will forward you copies of all proxies and shareholder communications relating to your account assets.

#### Item 18 – Financial Information

We are required to provide you with certain financial information or disclosures about our financial condition. We have no financial commitment that would impair our ability to meet any contractual and fiduciary commitments to you, our client. We have not been the subject of any bankruptcy proceedings. In no event shall we charge advisory fees that are both in excess of five hundred dollars and more than six months in advance of advisory services rendered.

### Item 19 – Requirements for State Registered Advisers

#### **Principals**

There is one principal of Reatherford Wealth Management, Collin Reatherford. He is the Chief Compliance Officer and was born in 1992. His education information, business background, and other business activities can be found in the Form ADV Part 2B Brochure Supplement below.

#### **Performance Fees**

We do not charge a performance-based fee (fees based on a share of capital gains on, or capital appreciation of, the assets of a client) for our normal asset management accounts.

#### **Disclosable Events**

Neither Reatherford Wealth Management nor Collin Reatherford has any reportable events to disclose here.

### **Other Relationships**

Neither Reatherford Wealth Management nor Collin Reatherford has any relationship with any issuer of securities.

### ADV Part 2B Brochure Supplement - Collin Reatherford

Item 1 – Cover Page

# **Collin Reatherford**

CRD # 6638101

## **Reatherford Wealth Management LLC**

316 S.W. Washington Street, Suite 1A Peoria, IL 61602 (309) 431-5380

### March 1, 2024

This Brochure supplement provides information about Collin Reatherford and supplements the Reatherford Wealth Management Brochure. You should have received a copy of that Brochure. Please contact Collin Reatherford if you did not receive the Brochure or if you have any questions about the contents of this supplement.

Additional information about Collin Reatherford, CRD # 6638101, is available on the SEC's website at www.adviserinfo.sec.gov.

### Item 2 – Educational Background and Business Experience

Collin Lance Reatherford 1992

#### **Education**

General Education 2014

Illinois Central College East Peoria, Illinois

### **Designations**

#### ChFC®- Chartered Financial Consultant®

• Bachelor's degree or its equivalent, in any discipline, from an accredited university, this qualifies as one year of business experience.

- Three years of full-time business experience is required; this three-year period must be within the five
  years preceding the date of the award (part-time qualifying business experience is also credited
  toward the three-year requirement with 2,000 hours representing the equivalent of one-year fulltime experience).
- Must fulfill the ChFC® seven-course curriculum, as well as two additional elective courses.
- Pass the exams for all required and elective courses.
- Pass a background check and candidate fitness standards test. You must reveal any criminal history, pending litigation, or ethical violations.

#### RICP® (Retirement Income Certified Professional™):

The RICP® designation teaches advisers techniques and best practices used to create sustainable streams of retirement income. The education covers retirement income planning, maximizing Social Security and other income sources, minimizing risks to the plan, and managing portfolios during the asset distribution phase. The designation includes three required, college-level courses that represent a total average study time of more than 150 hours. RICP® designees must meet experience, continuing education, and ethics requirements. The credential is awarded by The American College, a non-profit educator with an 85-year heritage and the highest form of academic accreditation.

#### **Business History**

January 2022 – Present	CCO and Managing Member at Reatherford Wealth Management LLC
January 2018 – January 2022	Registered Representative at MML Investors Services, LLC

October 2017 – Present Insurance Agent at Mass Mutual Life Insurance Company

June 2016 – November 2017 Insurance Agent at Northwestern Mutual Life Insurance Company April

2016 – November 2017 Registered Representative Northwestern Mutual Investment Services

### Item 3 - Disciplinary History

Neither Reatherford Wealth Management nor Collin Reatherford has any disciplinary history to disclose.

#### Item 4 – Other Business Activities

Collin Reatherford may recommend insurance products and may also, as an independent insurance agent, sell those recommended insurance products to clients. The sale of these products accounts for approximately 10% of his time. When such recommendations or sales are made, a conflict of interest exists as the insurance licensed IARs earn insurance commissions for the sale of those products, which may create an incentive to recommend such products. We require that all IARs disclose this conflict of interest when such recommendations are made. Also, we require IARs to disclose that clients may purchase recommended insurance products from other insurance agents not affiliated with us.

### Item 5 – Additional Compensation

Collin Reatherford does not receive any other compensation.

Collin Reatherford may receive additional compensation from sales of insurance products. He may be eligible to receive incentive awards (including prizes such as trips or bonuses) for recommending certain types of insurance policies or other investment products that he recommends.

While Collin Reatherford endeavors at all times to put the interest of our clients first as part of our fiduciary duty, the possibility of receiving incentive awards creates a conflict of interest and may affect his judgment when making recommendations. We require that all IARs disclose this conflict of interest when such recommendations are made. Also, we require IARs to disclose that clients may purchase recommended insurance products from other insurance agents not affiliated with us.

### Item 6 – Supervision

Collin Reatherford is the sole Principal and performs all supervisory duties for his firm.

#### Item 7 – Requirements for State-Registered Advisers

Collin Reatherford has no reportable events to disclose here.