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Form ADV Part 2A
Firm Brochure

September 17, 2026

This brochure provides information about the qualifications and business practices of RDG Capital Management LLC ("RDGCM" or "firm" or "we"). If you have any questions about the contents of this brochure, please contact us at (585) 206-2782 or wbaniewicz@rdgcm.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. Acting as a registered investment adviser does not imply a certain level of skill or training.

Additional information about RDG Capital Management LLC also is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2

Material Changes

The material changes in this brochure from the last annual updating amendment of RDG Capital Management LLC on March 10, 2026, are described below. Material changes relate to RDG Capital Management LLC's policies, practices or conflicts of interests.

- Financial Planning Services Update (Items 4 and 5)
 - RDG Capital Management LLC has added financial planning services as a standalone offering available on an hourly fee basis. Clients may engage the firm for financial planning services independent of ongoing investment management services.
- Chief Compliance Officer
 - RDG Capital Management LLC has named Whitney Baniewicz as its new Chief Compliance Officer.

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Item 4

Advisory Business

RDGCM is an SEC-registered investment advisor. RDG Capital Management LLC (“RDGCM”) provides investment advisory services on a fee-only basis and does not receive commissions, referral fees, or other compensation from third parties in connection with advice provided to clients. RDGCM also offers financial planning services as a standalone service on an hourly fee basis. Clients may engage RDGCM for financial planning services independently of, and without engaging RDGCM for, ongoing investment management services. RDG Capital Management LLC was formed in New York State on December 28, 2023, by Whitney Baniewicz and Kate Kenney and both are owners of the firm.

Process

RDGCM works with clients to set up investment solutions and provide ongoing portfolio management services. We start by meeting to discuss our philosophy and to gather information about the client’s personal and financial circumstances. Later, we propose what we believe will be an appropriate investment plan, based upon the client’s unique risk tolerance and return objectives. This plan lays out our recommended asset mix among stocks, bonds, cash, and alternative investments. We try to maintain this asset mix through time, rebalancing to meet asset allocation targets as taxes and other constraints allow.

Each portfolio is customized to an individual client’s goals and needs. As described in Item 8, clients’ tax circumstances and other personal preferences are factored into how a portfolio is constructed. For example, if a client expresses a preference to hold a certain security, we will adjust our portfolio management strategy accordingly, while informing the client of the potential risks of such a holding.

As a registered investment advisor, RDGCM acts as a fiduciary in all aspects of its business, including when recommending the rollover or transfer of retirement accounts.

Portfolio Management

RDGCM’s core business is the discretionary management of investment portfolios. With a basis in academic research and through our sub advisory relationship with Armbruster Capital Management we pursue the general objectives of broad diversification, risk control, low costs, and tax efficiency in client portfolios.

We generally use index or asset class funds. These may take the form of exchange-traded funds (ETFs) or index mutual funds. We use index-based funds because of their broad diversification, low costs, and tax efficiency.

Financial Planning

RDGCM offers financial planning services as a separate advisory service designed to help clients evaluate and address a variety of financial planning needs. Financial planning engagements are tailored to each

client's individual goals, objectives, financial circumstances, and risk tolerance.

Financial planning services may include, but are not limited to:

- Investment planning
- Tax planning considerations (RDGCM does not provide tax advice)
- Retirement planning
- Education planning
- Debt and credit planning

As part of the financial planning process, RDGCM gathers information regarding the client's financial situation and objectives in order to develop personalized recommendations. Depending on the client's needs, recommendations may involve multiple areas of financial planning.

RDGCM does not provide legal or tax advice. Clients are encouraged to consult with qualified legal, tax, insurance, or other professionals regarding the implementation of any recommendations. With the client's authorization, RDGCM may coordinate with these professionals to facilitate implementation of the client's financial plan.

Assets Under Management

As of December 31, 2025, RDGCM manages approximately \$76.9 million on a discretionary basis and \$54.9 million on a non-discretionary basis.

Item 5 Fees and Compensation

RDGCM is compensated solely based on fees for its services.

Portfolio Management Fees

Assets under management are billed at 0.85% annually.

Fees may be waived for employees of RDGCM, their families, and in unique situations. All accounts within a single immediate family relationship may be grouped when calculating fees.

Fixed fees may be used depending on individual circumstances. Fees may be negotiable in some cases.

RDGCM charges fees on all assets held within managed accounts, including cash. If the cash balance is negative, because of a margin loan, the aggregate value of all other securities will be summed for billing purposes.

Fees are generally deducted directly from client accounts, but clients can request an invoice and pay via check. We will accommodate any reasonable client request regarding method of billing. Accounts are billed monthly in arrears.

Financial Planning Fees

Financial planning services are offered on an hourly fee basis. Hourly fees range from \$250 to \$500 per hour, depending on the scope and complexity of the engagement.

Clients are billed in arrears for services rendered. Payment is due upon receipt of the invoice and may be made by cash, check, or wire transfer.

The specific hourly fee and anticipated scope of services will be agreed upon with the client before services begin and will be documented in the client's advisory agreement or engagement letter.

RDGCM does not receive commissions or other forms of compensation from the sale of financial products in connection with its financial planning services. Clients are under no obligation to implement any recommendations made by RDGCM and are free to engage any professional or service provider of their choosing.

The fees we charge are the only fees that accrue to RDGCM. However, there are other costs implicit in the investment process. These include mutual fund management fees, alternative investment purchasing and custody fees, and trading commissions paid to the custodial firm.

Other Costs

We strive to keep investment-related costs low wherever possible, but all ETFs and mutual funds have management fees. These fees will vary depending on the specific investment plan recommended for each client, but generally they average around 0.10% for traditional portfolios (such as stocks and bonds) and 0.40% for portfolios that include specialty investments (such as commodities, currencies, and private real estate funds). For accounts holding mutual funds, RDGCM only uses "no load" mutual funds that do not charge distribution fees. Specific fees for each of the funds used are described in the fund's prospectus, which is available to clients from the fund company or by request from RDGCM.

The primary custodial firm we use is Charles Schwab and they do not charge explicit custodial fees. However, clients may be charged trading commissions by these custodians when we execute trades in their accounts. Trading commissions are minimized by keeping trading activity to a minimum, and by selecting custodians with low commission rates. Please see Item 12 of this brochure for more information about brokerage fees.

All costs are exclusive of and in addition to RDGCM's fee. RDGCM does not receive any portion of these commissions, fees, or costs. RDGCM does not accept compensation for the sale of securities or other investment products.

Item 6

Performance-Based Fees and Side-by-Side Management

RDGCM does not manage any portfolios with performance-based fees.

Item 7

Types of Clients

Our firm offers advisory services to high-net-worth individuals, pension and profit-sharing plans, employer sponsored retirement plans, trusts, estates, charitable organizations, corporations, and other business entities.

Item 8

Methods of Analysis, Investment Strategies, and Risk of Loss

RDGCM employs long-term, buy-and-hold strategies to gain exposure to the returns of the various segments of the global investment markets. We rebalance when needed to ensure each client's risk and return profile remains in line with what has been agreed upon. We review the statistical properties of many different asset classes to help us determine which may be appropriate for client accounts. This includes looking at historical return, standard deviation (a measure of risk or volatility), and the correlation of each asset class compared with the other asset classes included in client portfolios. This allows us to get a sense of whether the asset class has a positive expected return, how much risk we will have to take to earn those returns, and whether the returns are complimentary to the returns of other portfolio holdings.

Next, we figure out how best to allocate capital among these asset classes for each individual client. This process means looking at a client's personal income, time horizon, goals and objectives for their money, risk preferences and ability to take risk, and current cash needs. We then construct a customized portfolio based on a combination of the client's financial profile and our statistical analysis of asset class risk and return characteristics.

Portfolio Strategies

Once we arrive at the desired asset allocation plan, we need to select which investments to use for the implementation of the plan. Our preferred approach is to invest a client's portfolio using a "core and satellite" approach. This includes a core of pure index funds and a satellite portfolio of factor-based funds. This type of portfolio will capture the returns of many different segments of the capital markets, including

the various sub-segments of the domestic and foreign stock, bond, real estate, and alternative investment markets.

However, it is not unusual for clients to fund their accounts through the in-kind transfer of stocks, bonds, mutual funds, and other securities. Frequently we are not able to sell these investments because of adverse tax consequences. For example, a client may bring an account to RDGCM that holds several stocks with low-cost basis in a taxable account. If we believe the risk of holding the individual stocks is outweighed by the taxes to be paid by selling these stocks, we will hold them for clients and build an asset allocation plan around them.

Additionally, we may purchase individual bonds to control risk in client portfolios. In other instances, clients would like to keep a portion of their portfolio in individual securities for personal reasons. Either way, under a hybrid approach, we will complement individual securities with highly diversified, index-based ETFs and mutual funds.

We review each account regularly to ensure adherence to the client's risk tolerance, return objectives, and unique preferences.

Security Selection

For each portfolio using mutual funds or ETFs, we select funds that invest efficiently in our target asset classes. We look at the legal structure of the investment funds, how well the funds track to the asset class they represent, their fees, and how efficiently they trade in the market.

The legal structure of the fund, such as whether it is an open-end mutual fund, unit investment trust, grantor trust, LLC, or something else, can have an impact on how returns are generated. Additionally, some funds do a good job of tracking their index or asset class, while others can deviate significantly from their targets. We want to make sure the funds we use are tracking closely with their underlying market benchmarks, so we compare the funds' actual returns with the returns of their market benchmark to see if the funds are successfully carrying out their mission. Fees discussed above in Item 5, can also vary meaningfully from fund to fund, and that will have an impact on expected return. Finally, we want to make sure the funds we use trade efficiently and do not incur undue market frictions such as wide bid/ask spreads. By focusing our analytical effort on these issues, we believe we can help our clients keep a portion of their returns that might otherwise be lost to financial intermediaries.

Most investments we purchase are designed to be held for a long period of time. For these sorts of investments, we are not overly concerned with short-term market fluctuations. Rather, we want to capture the long-term returns of the market in a sensible, risk-controlled way. We accomplish this through disciplined portfolio construction. In some cases, we will purchase securities designed to be held for a period of five years or less. These securities are usually either short duration individual fixed income securities, as part of a laddered bond portfolio, or short duration, high quality fixed income mutual funds.

The purpose of holding these securities will be to limit short-term fluctuations in a portion of a portfolio to accommodate either short-term cash needs or risk aversion.

Risks Involved

The major risk involved with our mutual fund and ETF positions is systematic risk, or the risk that markets decline in value. For example, a major pullback in the domestic stock market would have an adverse impact on our clients until the market recovers. Recoveries can take time and are not guaranteed. This may cause significant loss, especially over the short term. Rising interest rates, inflation, or a declining stock market are examples of this type of risk.

Clients who own individual stock or corporate debt securities in their accounts will also face idiosyncratic or security-specific risks. This is a risk that is limited to a specific company or industry. For example, an oil spill by a major oil company could affect clients who own stock in that oil company. With individual securities, the prospect of permanent loss of capital is always present. While we try to limit or even eliminate idiosyncratic risk through diversification, there is no guarantee that this risk will not cause losses in a portfolio consisting of individual securities.

Clients who own international securities, either through individual equities or through ETFs and mutual funds, will face another set of risks. First, foreign securities are exposed to different market conditions than U.S. securities, and the price of these securities can change quickly because of economic, political, or regulatory conditions. Furthermore, markets for foreign securities can be smaller and more tumultuous than markets for U.S. securities, leading to rapid changes in price. During any period when foreign securities underperform domestic securities, the performance of a client's overall investment portfolio may lag broad market benchmarks. Moreover, there may be additional fees to holding international investments, through extra brokerage, tax, and custody costs. Currency risk can also create price fluctuations for owners of international securities, as well as for investors in funds that invest directly in foreign-currency strategies, which we have used in the past and may use in the future. We try to limit these risks by investing in international securities primarily through ETFs and mutual funds, but the risks are always present for those wishing to gain exposure to international markets.

Some of the mutual funds we buy make use of derivative securities, creating derivatives risk. Derivative securities present to varying degrees, market risk that the performance of the underlying assets, interest rates or indices will decline; credit risk that the dealer or other counterparty to the transaction will fail to pay its obligations; and high volatility because of the use of leverage. Much of this risk is mitigated by the fact that these securities are not held directly by clients, and that any derivatives used by these mutual funds are both liquid and marked-to-market daily. Nevertheless, derivatives could result in unexpected losses in client portfolios.

For clients who own bonds, there is credit risk. Non-government bonds face the risk of downgrade, default, or widening credit spreads that could adversely impact the price of the security. Bonds, both individually

and through mutual fund vehicles, are also exposed to interest rate risk, the risk that bond prices can fluctuate as interest rates increase or decrease. During periods when interest rates are low or expected to increase, current yields and total returns for fixed income investors may also be low. Moreover, clients who own mortgage-backed securities, either through individual securities or a mutual fund, face prepayment risk that could negatively affect the price of the investment.

RDGCM sometimes uses funds that do not trade daily. Some mutual funds, for example in our alternative investment portfolio, have quarterly or less frequent redemption dates. These securities are priced daily. However, clients may not be able to immediately liquidate their positions and receive cash and therefore are subject to liquidity risk. This risk consists of the lack of marketability of an investment that cannot be sold quickly enough to prevent or minimize a loss. Some of the alternative funds we use also employ “gates”, which may prevent sales of the funds by investors for periods longer than regularly published liquidity dates. This can happen when too many investors want to redeem their shares at the same time, and the fund sponsor limits the amount of redemptions. We mitigate liquidity risk by limiting these types of securities to small parts of a client’s portfolio.

Another risk our clients face is the risk of any fund failing to execute on its strategy. Most of the funds we use are passive index funds, but some of the alternative investments we use are more actively managed. These funds may not be successful at carrying out their investment strategy, and this could result in investment losses.

Clients should understand that investing in any securities, including ETFs and mutual funds, involves a risk of loss of both income and principal. Before investing, clients should understand and be prepared to bear these risks.

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 an evaluation of RDGCM or the integrity of RDGCM’s management.

Neither RDGCM, nor any of its employees, has reportable disciplinary events to disclose.

Item 10 Other Financial Industry Activities and Affiliations

Armbruster Capital Management, Inc. is the subadvisor for RDGCM. RDGCM has retained ACM as the sub-adviser to perform investment management and related administrative services, provided that the Sub-Adviser is duly registered with the Securities and Exchange Commission. This means that ACM will be the discretionary investment manager to supervise and direct the investment of the client’s accounts in accordance with the terms of the Investment Management Agreement (IMA) and the Investment Policy

Statement (IPS). RDGCM will provide ACM with an IPS for each client and update ACM if there are any changes needed to the IPS. RDGCM will monitor and supervise that ACM is managing client portfolios appropriately and according to the IPS. ACM shares part of the client fees to provide these services.

Item 11

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

As an SEC-registered investment advisor, RDGCM maintains a code of ethics outlining acceptable standards of professional conduct. This code of ethics describes RDGCM's high standard of business conduct and fiduciary duty to clients. A copy of this document can be provided to any client or prospective client upon request.

RDGCM employees may purchase securities for their personal accounts that they recommend to clients. While we believe it makes sense for us to want to invest the same way as our clients, this could present a conflict of interest. For example, if RDGCM executes trades in personal accounts before client accounts, we could effectively "front run" our clients and benefit personally (or cause disadvantage to clients) from the subsequent buying we do in client accounts. We believe there are significant safeguards to prevent this. In general, we try to make trades in personal accounts only after trades have been made in the same securities for client accounts, and we do not take positions on the opposite side of our clients' positions (for example, we will not short a security in a personal account when a client has a long position in that security). Nevertheless, all personal transactions in individual securities will be reviewed by the Chief Compliance Officer (CCO) and/or the Managing Partner on a case-by-case basis. In their review, the CCO and/or the Managing Partner will ensure that these trades in individual securities do not cause harm to or disadvantage clients. There is a significant section of RDGCM's policies and procedures manual that describes the firm's trading policy and prohibits employees from trading ahead of clients.

Additionally, we typically invest in mutual funds, ETFs, and individual securities that are very large and liquid. It is unlikely that anyone at RDGCM will be able to do trades large enough to impact the market price of any of these securities. Also, open-ended mutual funds trade at their net asset value, so their valuations will not be impacted by trading activity.

RDGCM maintains a restricted list of companies where RDGCM employees may have access to inside information. RDGCM employees are not allowed to trade these securities for their personal accounts or for client accounts without approval from the restricted company's legal department unless the trade was directed by the client (who does not have insider information) and no advice or insider information was shared with the client. In such cases of client directed trades, the trade will be executed by the subadvisor so long as they do not have the insider information.

Item 12 Brokerage Practices

RDGCM requires clients to establish brokerage and custody accounts with Charles Schwab, which is a registered broker-dealer, and member of SIPC. The basis of this decision is the strength of the firm, efficiency of trade execution, commission rates, ability to hold a diverse range of securities, client service, and the ability to interface with our portfolio management system. Commission rates are compared with other large industry providers to ensure our clients receive competitive rates for the size and frequency of trading. Research provided by custodial firms is not a significant consideration in our decision to use their services.

RDGCM does not participate in any “soft dollar” arrangements where commissions are rebated back to us in the form of research services.

Apart from some individual bond trades, almost all trading is done with the custodial firm to avoid “trade away” fees.

RDGCM may aggregate trades or engage in block trading. Each client account has a unique asset allocation plan and is therefore managed individually. However, it is common for two or more clients on the same day to have trades made that are of the same security and trade direction (buy or sell). If these trades are to be executed at the same time, RDGCM will aggregate the trades into a “block” at each custodian and execute one trade through a block account. The block trade is then allocated on the same day as execution to each client account according to their individual modeled trade amounts. When this allocation occurs, each client receives the exact same execution price. This ensures that no client is placed at an advantage or disadvantage over another when it comes to realized trade values.

Item 13 Review of Accounts

Client accounts are reviewed by the firm’s Portfolio Management Team, which is managed by Armbruster Capital Management, Inc. on a regular basis. RDGCM receives daily downloads of client transactions from its custodians. Any material day-to-day changes, such as cash inflows and outflows, are acted upon as they are identified.

We recommend that most clients meet with us on a regular basis to review performance, asset allocation, and any material changes in the clients’ personal or financial circumstances. At these meetings, we provide written reports on performance, asset allocation versus targets, holdings, realized gains and losses, and others as appropriate. RDGCM agrees to provide the Subadvisor with prompt written notice of any modifications, changes, or investment restrictions applicable to client accounts. RDGCM will notify the Subadvisor in writing if RDGCM believes that any investments recommended or invested in client accounts

are in violation of the investment objectives, restrictions, or the Investment Policy Statement.

Clients receive a quarterly newsletter with an account statement, statement of account performance, and a report of their asset allocation versus established targets. Other, more detailed reports are available directly from RDGCM by request or electronically via internet portals set up for each client.

Item 14 Client Referrals and Other Compensation

RDGCM does not receive remuneration from outside parties for client referrals, nor does RDGCM directly or indirectly compensate any person who is not a supervised person for client referrals.

Item 15 Custody

Custodial firms are generally bank or brokerage firms that maintain client accounts and physically hold the securities in them. RDGCM generally does not take custody of client accounts; therefore, custodial relationships must be established for all accounts opened with RDGCM.

The custodian RDGCM uses, sends statements on a periodic basis, generally monthly, a minimum of quarterly, and provides trade confirmations after trades are executed. These documents are sent to clients directly from the custodial firm, not through RDGCM. RDGCM provides reports of client account holdings that match reports from the custodians. If that is not the case, clients should contact RDGCM immediately. Clients can set up online access to their accounts through the custodians' websites. We believe this separation of management and custody is an important safeguard for our clients.

While RDGCM does not take practical custody of client assets, it is deemed to have legal custody in situations relating to standing instructions on accounts that result in money movement to third parties. These instructions are only set up through signed documentation from account holders and acted upon when the client directs RDGCM to move the money.

Item 16 Investment Discretion

RDGCM generally has investment discretion on client accounts, except for some employer retirement plans. Clients sign an investment management agreement at the inception of our relationship, giving us the ability to trade their accounts. Additionally, the custodial paperwork specifies limitations clients may place on our discretion, such as whether or not we can draw fees directly from the account and whether or not we will be authorized to request distributions on the client's behalf.

In some cases, clients like to have a more active role in the management of their accounts. While we

maintain legal discretion, we are flexible on how we work with clients. We welcome client involvement in the investment process.

Item 17 Voting Client Securities

RDGCM shall not take any action or render any advice with respect to the voting of proxies. Clients will receive the proxy information directly from their custodian. When assistance on voting proxies is requested, RDGCM will provide recommendations to the client.

Item 18 Financial Information

Financial information is not required since RDGCM does not bill clients in advance of providing services.



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September 17, 2026

This brochure supplement provides information about Whitney Baniewicz that supplements the RDGCM brochure. You should have received a copy of that brochure. Please contact Whitney Baniewicz, Chief Compliance Officer if you have not received RDG Capital Management LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Whitney Baniewicz is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2: Educational Background and Business Experience

Whitney Baniewicz

Year of Birth: 1982

Education

Whitney Baniewicz graduated from University of Tennessee with a bachelor's degree in 2006 with degrees in Accounting and Business Management. Whitney has also successfully passed the Certified Public Accounting Exam and securities examination Series 65.

Business Background

RDG Capital Management LLC, Chief Compliance Officer, 2026 - Present

RDG Capital Management LLC, Principal 2024-Present

RDG & Partners, CPA (previously RDHB CPA, and Rizzo DiGiacco CPA), Partner, 2012-2025

W.L.Baniewicz, CPA, Owner 2010-2012

Ross & Baniewicz, CPA 2010-2012

Gerald D. Ross, CPA PC, 2006-2010

Item 3

Disciplinary Information

Whitney Baniewicz has not been involved in any disciplinary events.

Item 4

Other Business Activities

Whitney Baniewicz also serves as a board member for the Mary Cariola Agency and The Charles Finney School, she is not compensated for this work.

Item 5

Additional Compensation

Mrs. Baniewicz does not receive any additional compensation, beyond her salary and shareholder distributions, for providing investment advisory services.

Item 6

Supervision

Mrs. Baniewicz's is the Chief Compliance Officer of RDG Capital Management LLC and can be reached at (585) 206-2782. She is the representative of the firm and supervises all activities.

RDG Capital Management LLC has implemented a Code of Ethics, an internal compliance document that guides each supervised person in meeting their fiduciary obligations to clients of RDG Capital Management LLC. Further, RDG Capital Management LLC is subject to regulatory oversight by various agencies. RDGCM is subject to examinations by regulators.



Part 2B of Form ADV
Brochure Supplement

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September 17, 2026

This brochure supplement provides information about Kate Kenney that supplements the RDGCM brochure. You should have received a copy of that brochure. Please contact Whitney Baniewicz, Chief Compliance Officer if you did not receive RDG Capital Management LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Kate Kenney is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2: Educational Background and Business Experience

Kate Kenney

Year of Birth: 1974

Education

Kate Kenney graduated from The State University at Oswego with a bachelor's degree in accounting and a minor in Economics in 1997. Kate has also successfully passed the following securities examinations: Series 65 and the Life, Accident & Health Agent/Broker exam.

Business Background

RDG Capital Management LLC, Chief Compliance Officer, January 2026 – October 2026

RDG Capital Management LLC, Principal, 2024 - Present

Path Advisory LLC, Principal, 2026 - Present

1RDG, Partner, 2025

Anderson Kenney Associates, DBA RDG HR Solutions, Partner, 2020 - 2026

ProNexus LLC, Partner, 2012 – 2020

Randstad, Account Executive, 2006-2012

Alstom Signaling, Project Controller, 2005 – 2006

Element K, Financial Reporting Manager, 1997 - 2005

Item 3

Disciplinary Information

Kate Kenney has not been involved in any disciplinary events.

Item 4

Other Business Activities

Kate Kenney is the Chair of the Child Advocacy Center of Greater Rochester Board (formerly Bivona) and is on the board of FCA Upstate Lacrosse is not compensated for this work.

Item 5

Additional Compensation

Mrs. Kenney does not receive any additional compensation, beyond her salary and shareholder distributions, for providing investment advisory services.

Item 6

Supervision

Mrs. Kenney's professional activities are monitored by the Chief Compliance Officer, and she must adhere to all securities laws, and RDG Capital Management LLC's internal code of ethics.

RDG Capital Management LLC has implemented a Code of Ethics, an internal compliance document that guides each supervised person in meeting their fiduciary obligations to clients of RDG Capital Management LLC. Further, RDG Capital Management LLC is subject to regulatory oversight by various agencies. RDGCM is subject to examinations by regulators. Kate Kenney is also bound by all securities laws.