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## **ITEM 13: REVIEW OF ACCOUNTS**

### **A. Periodic Reviews**

Investment Management involves periodic monitoring and review of portfolio assets. Investment management services entail quarterly internal reviews. Reviews will be conducted by Richard L. Minaya. He will review investment results, asset allocation, client objectives and other variables that may have been identified during the course of the engagement. Rich Michaels Investments advises clients to immediately notify the Firm of any changes to their financial status in the event there needs to be a change in their investment plan. Otherwise, personal meetings with clients to review investment results and strategies are performed at client's discretion.

### **B. Factors that Will Trigger Non-Periodic Reviews**

These reviews may occur more frequently, depending upon the underlying assets in the portfolios, market conditions or as desired by the client.

### **C. Reports Provided to Clients**

Clients receive standard account statements from investment sponsors and brokerage firms monthly or quarterly, depending upon the custodian utilized.

## **ITEM 14: CLIENT REFERRALS AND OTHER COMPENSATION**

### **A. Third Party Compensation**

Rich Michaels Investments does not provide compensation either directly or indirectly to any non-supervised person for referrals. Additionally, the Firm does not receive any economic benefits from any non-clients for providing investment advice to Rich Michaels Investments' clients.

## **B. Referrals**

Rich Michaels Investments does not provide nor receive compensation either directly or indirectly to any non-supervised person for referrals.

### **ITEM 15: CUSTODY**

Rich Michaels Investments does not maintain custody of its clients' funds or securities. Clients receive at least quarterly statements from the broker/dealer, bank or other qualified custodian that holds and maintains clients' investment assets. Rich Michaels Investments urges its clients to carefully review such statements and compare such official custodial records to the account statements that it may provide. Rich Michaels Investments' statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities. Advisory Fees are deducted monthly by the Custodian. Adviser may also accept client Financial Planning fees via check or use of 3rd party AdvicePay.

### **ITEM 16: INVESTMENT DISCRETION**

Rich Michaels Investments usually receives written discretionary authority from the client at the outset of an advisory relationship to select the identity of and the amount of securities to be bought or sold. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account. When selecting securities, and determining amounts, Rich Michaels Investments observes the investment policies, limitations and restrictions of the clients for which it advises. Investment guidelines and restrictions must be provided to Rich Michaels Investments in writing.

### **ITEM 17: VOTING CLIENT SECURITIES**

Clients will receive their proxies from their custodian. The Adviser will not vote proxies on behalf of the Client's Account. Additionally, the Adviser will not be required to take any action or render any advice with respect to voting of proxies solicited by or with respect to the issuers of securities in which Assets be invested from time to time. Further, the Adviser will not take any action or render any advice with respect to any securities held in the Account, which are named in or subject to class action lawsuits. The Adviser will, however, forward to the Client any information received by the Adviser regarding class action legal matters involving any security held in the Account.



## **ITEM 18: FINANCIAL INFORMATION**

Registered investment advisers are required in this Item to provide clients with certain financial information or disclosures about their financial condition. Rich Michaels Investments is well capitalized, has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients and has not been the subject of a bankruptcy proceeding except as noted below.

### **A. Balance Sheet**

Rich Michaels Investments does not require nor solicit prepayment of investment advisory fees of \$500 or more per client, six months or more in advance. Therefore, the Adviser is not required to include a balance sheet with this brochure.

### **B. Financial Conditions**

Neither Rich Michaels Investments nor its management have any financial conditions that are likely to reasonably impair the Adviser's ability to meet contractual commitments to clients.

### **C. Bankruptcy Petitions**

Neither Rich Michaels Investments nor Richard L. Minaya, the sole owner of Rich Michaels Investments, has been the subject of a bankruptcy petition in the last ten years.

## **ITEM 19: REQUIREMENTS FOR STATE-REGISTERED ADVISERS**

### **A. Principal Executive Officers and Management Persons**

Rich Minaya is the sole executive officer. Please see his ADV Part 2B.

### **B. Other Business Interests**

Please see Rich Minaya's ADV 2B.

### **C. Performance-Based Fees**

Rich Michaels Investments does not accept performance-based fees.

### **D. Disciplinary Events**

Neither the Rich Michaels Investments nor Richard L. Minaya have any matters to disclose under this item that has not been disclosed elsewhere in this brochure.

### **E. Relationships with Issuers of Securities**

Neither Rich Michaels Investments nor its management persons have any relationships or arrangements with any issuers of securities.