

# BHF RG Capital Inc. dba "RG Capital"

## FORM ADV PART 3 RELATIONSHIP SUMMARY

### 1. INTRODUCTION

BHF RG Capital Inc., doing business as RG Capital ("RGC", "we", "our") is a registered investment adviser primarily based in Scottsdale, Arizona. We are organized as a Corporation under the laws of the State of Michigan. We have been providing investment advisory services since 2015 and are a registered investment advisor with the U.S. Securities and Exchange Commission. Brokerage and investment advisory services and fees differ so it is important for retail investors ("you", "your") to understand the differences. Free and simple tools are available to research firms and financial professionals at <https://investor.gov/CRS>, which also provides educational materials about broker-dealers, investment advisers, and investing.

### 2. RELATIONSHIPS AND SERVICES

*What investment services and advice can you provide me?*

RGC offers investment advisory services to retail investors through an investment management account, an individual retirement account, or an account associated with an employer pension plan. Our practice is to exercise discretion (the ability to make decisions to buy and sell securities in your account without your permission) when managing your account. You may limit our discretion by directing us to retain certain positions, or limit or exclude investment in certain asset classes or securities. In a non-discretionary account, prior to each securities transaction, RGC obtains approval from you before executing the buy or sell. As part of our standard advisory services, we monitor the securities held in your account(s) on an ongoing, continuous basis. We formally review each client account at least annually. This review is done to monitor your portfolio for compliance with your investment objectives and risk tolerance. This review is a standard part of the asset-based fee you pay. You are responsible to inform us of any changes in your investment objectives and/or financial situation. Our investment models are based on allocations to stocks, bonds, and/or cash. We use mutual funds and/or exchange traded funds to diversify your portfolio and when appropriate, to invest in specialized market sectors. We may also use separately managed accounts to diversify your portfolio by accessing experienced third-party managers

Account Opening Requirements: RGC requires you to sign a written Investment Management Agreement which authorizes us to manage investments on your behalf. You may cancel the Investment Management Agreement at any time. RGC does not have a minimum account size for an Investment Management Account, Individual Retirement Account, or employer pension plan.

**Please see Item 4 and 7 in our ADV Part 2 for additional details.**

#### Questions to ask your professional:

- *Given my financial situation, should I choose an investment advisory service? Why or why not?*
- *How will you choose investments to recommend to me?*
- *What is your relevant experience, including your licenses, education, and other qualification?*
- *What do these qualifications mean?*

### 3. FEES, COSTS, CONFLICTS, AND STANDARD OF CONDUCT

We charge an asset-based fee as a percentage of all your account assets, including cash. Our annual portfolio management fee is negotiable, not to exceed 3.00% of assets under management. Our standard fee schedule is tiered based on the amount of assets you invest with us. The more assets we manage for you, the more fee revenue we collect and so we have an incentive to encourage you to increase account assets. Custodial fees charged are not included in your fee. If we decide to use separately managed accounts to diversify your account, this cost is part of the asset-based fee we

charge. Such fees are prorated for the initial quarter and paid quarterly in advance thereafter, based upon the balance at end of billing period of client accounts.

You will also pay costs associated with buying and selling securities, such as mutual fund and exchange traded fund expenses, and other possible fees. Our affiliate may pass along certain transactional costs associated with acting as custodian for your account. You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. **Please see Item 5.E in our ADV Part 1 and Item 5 of our ADV Part 2 for further details about fees and expenses.**

*What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?*

When we act as your investment adviser, we have to act in your best interest and not put our interests ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means. How might your conflicts of interest affect me, and how will you address them?

<b>Possible Conflicts of Interest</b>	<b>Description of Conflict of Interest</b>
12b-1 Fees	Our broker dealer First Allied Securities, Inc. collects any 12b-1 fees that are generated by mutual funds held in your account, if any. This presents a conflict of interest because persons providing investment advice on behalf of our firm who are registered representatives have an incentive to effect securities transactions for the purpose of generating commissions rather than solely based on your needs.
Insurance Products	Insurance commissions earned are separate and in addition to our advisory fees. This practice presents a conflict of interest because persons providing investment advice who are insurance agents have an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely based on your needs.

*How do your financial professionals make money?*

Our employees are paid a salary. **For a complete description of our conflicts of interest and how we manage them, please see our ADV Part 2.**

Questions to ask your professional:

- *How might your conflicts of interest affect me, and how will you address them?*

#### 4. DISCIPLINARY HISTORY

*Do you or your financial professionals have legal or disciplinary history?*

Yes, the details on this matter can be found on the IAPD. [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

#### 5. ADDITIONAL INFORMATION

*Who is my primary contact person? Is he or she a representative of an investment adviser or a broker dealer? Who can I talk to if I have concerns about how this person is treating me?*

For up-to-date information or to request a current copy of Form CRS, contact Richard Oelze, Chief Compliance Officer, at 480-612-6400 or [richard.oelze@rgcapital.net](mailto:richard.oelze@rgcapital.net).