Item 1: Cover Page



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Form ADV Part 2A - Firm Brochure

Dated: January 30, 2024

This Brochure provides information about the qualifications and business practices of RLS Private Wealth Consulting, Inc. ("RLS"). If you have any questions about the contents of this Brochure, please contact us at (559) 999-2620 or rhonda@rlswealthconsulting.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.

RLS Private Wealth Consulting, Inc. is registered as an Investment Adviser with the State of California. Registration of an Investment Adviser does not imply any level of skill or training.

Additional information about RLS is available on the SEC's website at <u>www.adviserinfo.sec.gov</u>, which can be found using the firm's identification number, 312496.

Item 2: Material Changes

The last annual update of this Brochure was submitted on January 16, 2023. The following changes have been made to this version of the Disclosure Brochure:

- We have updated our hourly fees for financial planning.
- We have added Project-Based Financial Planning.
- We have added Select Family Office Services.
- We will no longer accept payment through credit cards.
- Our phone number has been updated.
- Wealth Concierge has been added as a service.
- Description of Select Family Office Services has been updated.
- ADV Part 2B for Rhonda Staelgraeve-Secor has been updated.
- Item 15, Custody has been updated for Select Family Office Services

From time to time, we may amend this Brochure to reflect changes in our business practices, changes in regulations, and routine annual updates as required by securities regulators. Either this complete Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of RLS Private Wealth Consulting, Inc.

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Item 4: Advisory Business

Description of Advisory Firm

RLS Private Wealth Consulting, Inc. ("RLS") became registered as an Investment Adviser with the State of California in 2021. Rhonda Staelgraeve-Secor is the principal owner of RLS.

Types of Advisory Services

Financial Planning

We provide financial planning services on topics such as retirement planning, risk management, college savings, cash flow, debt management, work benefits, and estate and incapacity planning.

Financial planning 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. Clients purchasing this service will receive a written or an electronic report, providing the Client with a detailed financial plan designed to achieve his or her stated financial goals and objectives.

In general, the financial plan will address any or all of the following areas of concern. The Client and advisor will work together to select specific areas to cover. These areas may include, but are not limited to, the following:

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. We employ the Value Acceleration Methodology produced by the Exit Planning Institute to help business owners identify their personal, financial, and business readiness for a potential exit. Through this process we educate business owners on ways to increase the value of their companies and prepare for an eventual exit from their business. We also help business owners identify the most suitable strategies for an exit or ownership transition.

Cash Flow and Debt Management: We will conduct a review of income and expenses to determine current surplus or deficit along with advice on prioritizing how any surplus should be used or how to reduce expenses if they exceed income. Advice may also be provided on which debts to pay off first based on factors such as the interest rate of the debt and any income tax ramifications. 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.

Charitable Planning/Giving: Charitable planning services typically include a discovery of the client's charitable inclinations and advice on how best to incorporate those into an overall financial plan. For example, we may review the various charitable planning structures (funds, trusts, etc.) and work together to determine the most suitable option(s) to achieve the client's charitable, tax, and estate goals.

College Savings: Includes projecting the amount that will be needed to achieve college or other post-secondary education funding goals, along with advice on ways to save the desired amount. Recommendations as to savings strategies are included, and, if needed, we will review the client's financial picture as it relates to eligibility for financial aid or the best way to contribute to grandchildren (if appropriate).

Data File Organization: We will assist clients in the process of efficiently building and organizing an electronic file drawer of important documents all in one, accessible secure site that is accessible anywhere a client has internet access. Clients can store any sort of important papers and have full access to monitor who has been given access to the files. The client can be confident their documents are being shared only with those who they desire to see the documents, but can also have access to important documents electronically if needed.

Employee Benefits Optimization: We will provide review and analysis as to whether the client, as an employee, is taking the maximum advantage possible of their employee benefits. If the client is a business owner, we will consider and/or recommend the various benefit programs that can be structured to meet both business and personal retirement goals.

Estate Planning: This usually includes an analysis of exposure to estate taxes and the client's current estate plan, which may include whether a will, powers of attorney, trusts, and other related documents. Our advice also typically includes ways to minimize or avoid future estate taxes by implementing appropriate estate planning strategies such as the use of applicable trusts. We always recommend that clients consult with a qualified attorney when initiating, updating, or completing estate planning activities. We may provide contact information for attorneys who specialize in estate planning when a client wishes to hire an attorney for such purposes. From time-to-time, we will participate in meetings or phone calls with estate planning attorneys on behalf of or in support of the client.

Financial Goals: We will help clients identify financial goals and develop a plan to reach them. We will identify financial issues and goals that the client desires to accomplish, what resources are needed to make it happen, how much time it will take to reach the goal, and how much the client should budget to attain the goal.

Insurance: Review of existing policies to ensure proper coverage for life, health, disability, long-term care, liability, home, and automobile. We may provide clients with contact information for insurance agents, at your request.

Investment Analysis/Advice: This may involve developing an asset allocation strategy to meet clients' financial goals and risk tolerance, providing broad information on investment vehicles and strategies, reviewing employee stock options, as well as assisting clients in establishing an investment account at a selected broker/dealer, registered investment advisor, or custodian. The strategies and types of investments we may recommend are further discussed in Item 8 of this brochure.

Retirement Planning: Our retirement planning services typically include projections of a client's likelihood of achieving his/her 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 the client is 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 retirement years.

Risk Management: A risk management review includes an analysis of exposure to major risks that could have a significantly adverse impact on the client's financial picture, such as premature death, disability, property and casualty losses, or the need for long-term care planning. Advice may be provided on ways to minimize such risks and about weighing the costs of purchasing insurance versus the benefits of doing so and, likewise, the potential cost of not purchasing insurance ("self-insuring").

Tax Planning Strategies: Advice may include ways to minimize current and future income taxes as a part of a client's 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 the client's situation.

We recommend that clients consult with a qualified tax professional before initiating any tax planning strategy, and we may provide contact information for accountants or attorneys who specialize in this area if a client wishes to hire someone for such purposes. We will participate in meetings or phone calls between the client and their tax professional with the client's approval.

Ongoing Comprehensive Financial Planning

This service involves working one-on-one with a planner over an extended period of time. By paying an ongoing fee, Clients get to work with a planner who will work with them to develop and implement their plan. The planner will monitor the plan, recommend any changes, and ensure the plan is up to date.

Upon desiring a comprehensive plan, a Client will be taken through establishing their goals and values around money. They will be required to provide 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. Once the Client's information is reviewed, their plan will be built and analyzed, and then the findings, analysis, and potential changes to their current situation will be reviewed with the Client. Clients subscribing to this service will receive a written or an electronic report, providing the Client with a detailed financial plan designed to achieve his or her stated financial goals and objectives. If a follow-up meeting is required, we will meet at the Client's convenience. 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 action 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. Any needed updates will be implemented at that time.

Project-Based Financial Planning

We provide project-based financial planning services on a limited scope one-time engagement. Project-Based Financial Planning is available for Clients looking to address specific questions or issues. The Client may choose from one or more of the above topics to cover or other areas as requested and agreed to by RLS. For Limited Scope Financial Planning, the Client will be ultimately responsible for the implementation of the financial plan.

Wealth Concierge

We provide clients with assistance in all aspects of their wealth planning implementation needs and various tertiary services. Serving as a trusted advisor, advocate, or liaison for our client, we help clients with issues pertaining to their personal, financial, and business succession risk management, strategy and solution implementation, and oversight of third-party product and service providers. We help clients with such needs as deciphering account statements, interviewing and hiring third-party product and service providers, advice with hiring needs for their personal and business management staff, suggestions for software that may be helpful for their planning needs, and various questions relative to their personal and financial concerns. For clients who request referrals to third-party product and service providers, we maintain a network of qualified professionals, who clients may use – but are not required to – for the implementation of planning strategies and solutions.

Select Family Office Services

We also provide select family office services on a project basis. This service may include any or all the below:

- General Operational and Administrative Oversight of family office affairs
- Investment Policy Statement Creation & Monitoring

- Asset Allocation Strategy & Monitoring
- Consolidated Real-time Reporting of All Financial Accounts
- Due Diligence, Collaboration, Oversight, and Coordination of Third-party product and service providers
- Recommendations to Third-party Professionals, as needed
- Meeting Coordination, Agenda Creation, and Facilitation
- Family Education Curriculum Development and Implementation
- Robust Virtual File Drawer and Organization of Pertinent Planning Documents

Educational Seminars/ Speaking Engagements

We may provide seminars and speaking engagements for groups seeking general advice on financial planning topics. These seminars are purely educational in nature and do not involve the sale of any investment products. Information presented will not be based on any individual person's need, nor does RLS provide individualized investment advice to attendees during these seminars.

Client Tailored Services and Client Imposed Restrictions

We offer the same suite of services to all of our Clients. However, specific Client financial plans and their implementation recommendations are dependent upon each Client's current situation (income, tax levels, and risk tolerance levels), goals, feelings, and future planning needs and is used to construct a Client specific plan to aid in the selection of planning strategies that will improve a client's chances for planning success.

Wrap Fee Programs

We do not participate in wrap fee programs.

Assets Under Management

RLS does not manage assets thus we do not have assets under management to report.

CCR Section 260.235.2 Disclosure

For Clients who receive our Financial Planning services, we must state when a conflict exists between the interests of our firm and the interests of our Client. The Client is under no obligation to act upon our recommendation. If the Client elects to act on any of the recommendations, the Client is under no obligation to affect the transaction through our firm.

Item 5: Fees and Compensation

Please note, unless a Client has received the firm's Disclosure Brochure at least 48 hours prior to signing the investment advisory contract, the investment advisory contract may be terminated by the Client within five (5) business days of signing the contract without incurring any advisory fees. How we are paid depends on the type of advisory service we are performing. Please review the fee and compensation information below.

Ongoing Comprehensive Financial Planning

Ongoing Financial Planning consists of an upfront charge of \$1,000 - \$5,000 and ongoing support as needed according to the hourly rate outlined below.

Fees are based on complexity and needs of the Client, and may be negotiable in certain cases. Fees for this service will be billed in arrears (except for the upfront charge) and may be paid by electronic funds transfer (EFT), debit card, or check. This service may be terminated with 30 days' notice. Since fees are paid in arrears, no refund will be needed upon termination of the account.

The upfront portion of the Ongoing Comprehensive Financial Planning fee is for Client onboarding, data gathering, and setting the basis for the financial plan. This work will commence immediately after the fee is paid, and will be completed within the first 30 days of the date the fee is paid. Therefore, the upfront portion of the fee will not be paid more than 6 months in advance.

Financial Planning

Financial Planning engagements are offered at the rate of \$325 per hour. The fee may be negotiable in certain cases and is due at the completion of the engagement. In the event of early termination by the Client, any fees for the hours already worked will be due. Fees for this service may be paid by electronic funds transfer (EFT), debit card, or check.

Project-Based Financial Planning Fixed Fee

Project-Based Financial Planning will generally be offered on a fixed fee basis. The fixed fee will be agreed upon before the start of any work. The fixed fee can range between \$1,000 and \$25,000. The fee is negotiable depending on the complexity of the project. If a fixed fee program is chosen, 50% of the fee is due at the beginning of the process and the remainder is due upon completion of the work. RLS will not bill an amount above \$500 more than 6 months in advance. Fees for this service may be paid by electronic funds transfer (EFT), debit card, or check. In the event of early termination, any prepaid but unearned fees will be refunded to the Client and any completed deliverables of the project will be provided to the Client and no further fees will be charged.

Wealth Concierge

Wealth Concierge services are offered on either an hourly or flat fee basis. The hourly rate is \$300 per hour and the flat fee can range between \$0 and \$50,000. Fees for this service are charged in arrears and may be paid by electronic funds (EFT), debit card, or check. In the event of early termination, any prepaid but unearned fees will be refunded to the Client and any completed deliverables of the project will be provided to the Client and no further fees will be charged.

Select Family Office Services

Select Family Office Services will be offered on a fixed fee basis. The fixed fee can range between \$0 and \$500,000 with an upfront retainer fee of at least \$1,000 and subsequent fees charged in arrears. Fees for this service may be paid by electronic funds transfer (EFT), debit card, or check. In the event of early termination, any prepaid but unearned fees will be refunded to the Client and any completed deliverables of the project will be provided to the Client and no further fees will be charged.

Educational Seminars/ Speaking Engagements

Seminars are offered to organizations and the public on a variety of financial topics. Fees range from free to \$5,000 per seminar or free to \$250 per participant. Half of the fees are due prior to the engagement, and the other half is to be paid the day of, no later than the conclusion of the Seminar. The fee range is based on the content, amount of research conducted, the number of hours of preparation needed, and the number of attendees. In the event of inclement weather or flight cancellation, the Speaker shall make all reasonable attempts to make alternative travel arrangements to arrive in time for the presentation. If travel proves impossible, or the event is otherwise canceled, the Speaker's fee is waived, but the Client will still be responsible for reimbursement of any non-refundable travel expenses already incurred.

In the event that the Client decides to cancel or change the date of the event for any reason besides weather or similar unforeseen causes, the Client will still be responsible for reimbursement of any non-refundable travel expenses already incurred, and will provide payment for 20% of the Speaker's fee if the cancellation occurs within 30 days of the event. In the event that the Speaker must cancel due to health or similar

unforeseen circumstances, the Speaker will make all attempts to find a reasonable alternative engagement date and will absorb any incremental additional costs for obtaining alternative travel arrangements. If an alternative date cannot be obtained, the Client will not be responsible for any travel costs already incurred by the Speaker or any portion of the Speaker's fee.

Seminars and speaking engagements are offered to organizations and the public on a variety of financial topics. Generally, fees for her speaking engagements range from free to \$5000 plus travel expenses, depending on sponsor, date, location, and program requested. For all speeches, 20% of the balance is due before the event and the remaining balance due at the conclusion of the event. Half of the fees are due prior to the engagement, and the other half is to be paid the day of, no later than the conclusion of the Seminar. The fee range is based on the content, amount of research conducted, the number of hours of preparation needed, and the number of attendees. The content is based on topics that are currently relevant in the financial planning environment.

In the event of inclement weather or flight cancellation, the Speaker shall make all reasonable attempts to make alternative travel arrangements to arrive in time for the presentation. If travel proves impossible, or the event is otherwise canceled, the Speaker's fee is waived, but the Client will still be responsible for reimbursement of any non-refundable travel expenses already incurred. In the event that the Client decides to cancel or change the date of the event for any reason besides weather or similar unforeseen causes, the Client will still be responsible for reimbursement of any non-refundable travel expenses already incurred, and will provide payment for 20% of the Speaker's fee if the cancellation occurs within 30 days of the event. In the event that the Speaker must cancel due to health or similar unforeseen circumstances, the Speaker will make all attempts to find a reasonable alternative engagement date and will absorb any incremental additional costs for obtaining alternative travel arrangements. If an alternative date cannot be obtained, the Client will not be responsible for any travel costs already incurred by the Speaker or any portion of the Speaker's fee.

Educational Seminars and Speaking Engagements may be provided pro-bono at RLS's discretion.

Other Types of Fees and Expenses

We do not offer investment management services. Through RLS's financial planning services, recommendations may be given regarding investment accounts. Clients may incur trading costs imposed by a broker-dealer when implementing our investment advice, however, RLS will not receive any portion of those fees

We do not accept compensation for the sale of securities or other investment products including asset-based sales charges or service fees from the sale of mutual funds.

CCR Section 260.238(j) Disclosure

Please note, lower fees for comparable services may be available from other sources.

Item 6: Performance-Based Fees and Side-By-Side Management

We do not offer performance-based fees and do not engage in side-by-side management.

Item 7: Types of Clients

We provide financial planning services to individuals, high net-worth individuals and businesses. We do not have a minimum account size requirement.

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

If Clients request us to review their investments as part of their financial plan, our primary methods of investment analysis are Fundamental, Technical and Cyclical analysis.

Fundamental analysis involves analyzing individual companies and their industry groups, such as a company's financial statements, details regarding the company's product line, the experience, and expertise of the company's management, and the outlook for the company's industry. The resulting data is used to measure the true value of the company's stock compared to the current market value. The risk of fundamental analysis is that the information obtained may be incorrect and the analysis may not provide an accurate estimate of earnings, which may be the basis for a stock's value. If securities prices adjust rapidly to new information, utilizing fundamental analysis may not result in favorable performance.

Technical analysis involves using chart patterns, momentum, volume, and relative strength in an effort to pick sectors that may outperform market indices. However, there is no assurance of accurate forecasts or that trends will develop in the markets we follow. In the past, there have been periods without discernible trends and similar periods will presumably occur in the future. Even where major trends develop, outside factors like government intervention could potentially shorten them.

Furthermore, one limitation of technical analysis is that it requires price movement data, which can translate into price trends sufficient to dictate a market entry or exit decision. In a trendless or erratic market, a technical method may fail to identify trends requiring action. In addition, technical methods may overreact to minor price movements, establishing positions contrary to overall price trends, which may result in losses. Finally, a technical trading method may underperform other trading methods when fundamental factors dominate price moves within a given market.

Cyclical analysis is a type of technical analysis that involves evaluating recurring price patterns and trends based upon business cycles. Economic/business cycles may not be predictable and may have many fluctuations between long-term expansions and contractions. The lengths of economic cycles may be difficult to predict with accuracy and therefore the risk of cyclical analysis is the difficulty in predicting economic trends and consequently the changing value of securities that would be affected by these changing trends.

Charting analysis involves the gathering and processing of price and volume information for a particular security. This price and volume information is analyzed using mathematical equations. The resulting data is then applied to graphing charts, which is used to predict future price movements based on price patterns and trends. Charts may not accurately predict future price movements. Current prices of securities may not reflect all information about the security and day-to-day changes in market prices of securities may follow random patterns and may not be predictable with any reliable degree of accuracy.

Modern Portfolio Theory

The underlying principles of MPT are:

- Investors are risk averse. The only acceptable risk is that which is adequately compensated by an
 expected return. Risk and investment return are related and an increase in risk requires an increased
 expected return.
- Markets are efficient. The same market information is available to all investors at the same time. The market prices every security fairly based upon this equal availability of information.

- The design of the portfolio as a whole is more important than the selection of any particular security. The appropriate allocation of capital among asset classes will have far more influence on long-term portfolio performance than the selection of individual securities.
- Investing for the long-term (preferably longer than ten years) becomes critical to investment success because it allows the long-term characteristics of the asset classes to surface.
- Increasing diversification of the portfolio with lower correlated asset class positions can decrease
 portfolio risk. Correlation is the statistical term for the extent to which two asset classes move in
 tandem or opposition to one another.

Passive Investment Management

We primarily offer passive investment management advice. Passive investing involves building portfolios that are composed of various distinct asset classes. The asset classes are weighted in a manner to achieve the desired relationship between correlation, risk, and return. Funds that passively capture the returns of the desired asset classes are placed in the portfolio. The funds that are used to build passive portfolios are typically index mutual funds or exchange-traded funds.

Passive investment management is characterized by low portfolio expenses (i.e. the funds inside the portfolio have low internal costs), minimal trading costs (due to infrequent trading activity), and relative tax efficiency (because the funds inside the portfolio are tax efficient and turnover inside the portfolio is minimal).

In contrast, active management involves a single manager or managers who employ some method, strategy, or technique to construct a portfolio that is intended to generate returns that are greater than the broader market or a designated benchmark.

Material Risks Involved

RLS does not provide investment management, however investment recommendations may be made as part of the financial planning services. All investing strategies we offer involve risk and may result in a loss of your original investment which you should be prepared to bear. Many of these risks apply equally to stocks, bonds, commodities, and any other investment or security. Material risks associated with our investment strategies 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.

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

Margin Transactions use leverage that is borrowed from a brokerage firm as collateral. When losses occur, the value of the margin account may fall below the brokerage firm's threshold thereby triggering a margin call. This may force the account holder to either allocate more funds to the account or sell assets on a shorter time frame than desired.

Commercial Paper is, in most cases, an unsecured promissory note that is issued with a maturity of 270 days or less. Being unsecured the risk to the investor is that the issuer may default.

Common stocks 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.

Corporate Bonds are debt securities to borrow money. Generally, issuers pay investors periodic interest and repay the amount borrowed either periodically during the life of the security and/or at maturity. Alternatively, investors can purchase other debt securities, such as zero-coupon bonds, which do not pay current interest, but rather are priced at a discount from their face values and their values accrete over time to face value at maturity. The market prices of debt securities fluctuate depending on factors such as interest rates, credit quality, and maturity. In general, market prices of debt securities decline when interest rates rise and increase when interest rates fall. The longer the time to a bond's maturity, the greater its interest rate risk.

Bank Obligations including bonds and certificates of deposit may be vulnerable to setbacks or panics in the banking industry. Banks and other financial institutions are greatly affected by interest rates and may be adversely affected by downturns in the U.S. and foreign economies or changes in banking regulations.

Municipal Bonds are debt obligations generally issued to obtain funds for various public purposes, including the construction of public facilities. Municipal bonds pay a lower rate of return than most other types of bonds. However, because of a municipal bond's tax-favored status, investors should compare the relative after-tax return to the after-tax return of other bonds, depending on the investor's tax bracket. Investing in municipal bonds carries the same general risks as investing in bonds in general. Those risks include interest rate risk, reinvestment risk, inflation risk, market risk, call or redemption risk, credit risk, and liquidity and valuation risk.

Exchange Traded Funds prices may vary significantly from the Net Asset Value due to market conditions. Certain Exchange Traded Funds may not track underlying benchmarks as expected. ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value; (ii) the ETF may employ an investment strategy that utilizes high leverage ratios; or (iii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. The Adviser has no control over the risks taken by the underlying funds in which the Clients invest.

Mutual Funds: When a Client invests in open-end mutual funds or ETFs, the Client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the Client will incur

higher expenses, many of which may be duplicative. In addition, the Client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives).

Item 9: Disciplinary Information

Criminal or Civil Actions

RLS and its management have not been involved in any criminal or civil action.

Administrative Enforcement Proceedings

RLS and its management have not been involved in administrative enforcement proceedings.

Self-Regulatory Organization Enforcement Proceedings

RLS and its management have not been involved in legal or disciplinary events that are material to a Client's or prospective Client's evaluation of RLS or the integrity of its management.

Item 10: Other Financial Industry Activities and Affiliations

No RLS employee is registered, or has an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

No RLS employee is registered, or has an application pending to register, as a futures commission merchant, commodity pool operator or a commodity trading advisor.

RLS does not have any related parties. As a result, we do not have a relationship with any related parties.

RLS only receives compensation directly from Clients. We do not receive compensation from any outside source. We do not have any conflicts of interest with any outside party.

Recommendations or Selections of Other Investment Advisers

RLS does not recommend Clients to Outside Managers to manage their accounts.

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

As a fiduciary, our firm and its associates have a duty of utmost good faith to act solely in the best interests of each Client. Our Clients entrust us with their funds and personal information, which in turn places a high standard on our conduct and integrity. Our fiduciary duty is a core aspect of our Code of Ethics and represents the expected basis of all of our dealings. The firm also adheres to the Code of Ethics and Professional Responsibility adopted by the CFP® Board of Standards Inc., and accepts the obligation not only to comply with the mandates and requirements of all applicable laws and regulations but also to take

responsibility to act in an ethical and professionally responsible manner in all professional services and activities.

Code of Ethics Description

This code does not attempt to identify all possible conflicts of interest, and literal compliance with each of its specific provisions will not shield associated persons from liability for personal trading or other conduct that violates a fiduciary duty to advisory Clients. A summary of the Code of Ethics' Principles is outlined below.

- Integrity Associated persons shall offer and provide professional services with integrity.
- Objectivity Associated persons shall be objective in providing professional services to Clients.
- Competence Associated persons shall provide services to Clients competently and maintain the necessary knowledge and skill to continue to do so in those areas in which they are engaged.
- Fairness Associated persons shall perform professional services in a manner that is fair and reasonable
 to Clients, principals, partners, and employers, and shall disclose conflict(s) of interest in providing
 such services.
- Confidentiality Associated persons shall not disclose confidential Client information without the specific consent of the Client unless in response to proper legal process, or as required by law.
- Professionalism Associated persons' conduct in all matters shall reflect the credit of the profession.
- Diligence Associated persons shall act diligently in providing professional services.

We periodically review and amend our Code of Ethics to ensure that it remains current, and we require all firm access persons to attest to their understanding of and adherence to the Code of Ethics at least annually. Our firm will provide a copy of its Code of Ethics to any Client or prospective Client upon request.

Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest

Neither our firm, its associates or any related person is authorized to recommend to a Client or effect a transaction for a Client, involving any security in which our firm or a related person has a material financial interest, such as in the capacity as an underwriter, adviser to the issuer, etc.

Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest

Our firm and its "related persons" do not invest in the same securities, or related securities, e.g., warrants, options, or futures, which we recommend to Clients.

Trading Securities At/Around the Same Time as Client's Securities

Because our firm and its "related persons" do not invest in the same securities, or related securities, e.g., warrants, options or futures, which we recommend to Clients, we do not trade in securities at or around the same time as Clients.

Item 12: Brokerage Practices

1. Research and Other Soft-Dollar Benefits

We do not receive soft dollar benefits.

2. Brokerage for Client Referrals

We receive no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

3. Clients Directing Which Broker/Dealer/Custodian to Use

As a fee-only financial planner who does not offer Investment Management Services, we do not have a concern over which broker-dealers a Client may choose in order to implement our investment recommendations.

Aggregating (Block) Trading for Multiple Client Accounts

Some Registered Investment Advisers execute Client accounts on an aggregated basis as a way to lower expenses. As a fee-only financial planner who does not offer Investment Management Services, we do not execute trades on behalf of Clients. As a result, it is up to the Client to negotiate their own trading costs with their broker-dealer.

Item 13: Review of Accounts

Rhonda Staelgraeve-Secor, President, Wealth Consultant and CCO of RLS, will work with Clients to obtain current information regarding their assets and investment holdings and will review this information as part of our financial planning services. RLS will review Client financial plans on at least an annual basis. Should particular circumstances warrant, specific planning issues will be addressed on a more frequent basis. RLS does not provide specific reports to financial planning Clients, other than financial plans.

Item 14: Client Referrals and Other Compensation

We do not receive any economic benefit, directly or indirectly, from any third party for advice rendered to our Clients. Nor do we, directly or indirectly, compensate any person who is not advisory personnel for Client referrals.

Item 15: Custody

For certain clients utilizing our select family office services, RLS is deemed to have custody due to our ability to provide bill-paying services and ability to direct third-parties to move cash based on the client's needs. As an adviser with custody, RLS is subject to an annual surprise custody examination by an independent public accountant that is both registered with and subject to regular inspection by the Public Companies Accounting Oversight Board (PCAOB) and must file audited financials directly to the California Department of Financial Protection and Innovation (CA-DFPI). RLS is also required to maintain a minimum net worth set by the CA-DFPI. All client funds are held at a qualified custodian and clients will receive statements from that qualified custodian at least quarterly.

Item 16: Investment Discretion

We do not provide Investment Management Services, and therefore do not exercise discretion.

Item 17: Voting Client Securities

RLS does not provide Investment Management Services, and therefore does not vote Client proxies.

Item 18: Financial Information

Registered Investment Advisers are required in this Item to provide you with certain financial information or disclosures about our financial condition. We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to Clients, and we have not been the subject of a bankruptcy proceeding.

We do not have custody of Client funds or securities or require or solicit prepayment of more than \$500 in fees per Client six months in advance.

Item 19: Requirements for State-Registered Adviser

Principal Officers

Rhonda Staelgraeve-Secor serves as RLS's sole principal and CCO. Information about Rhonda Staelgraeve-Secor's education, business background, and outside business activities can be found on her ADV Part 2B, Brochure Supplement attached to this Brochure.

Other Business Activities

All outside business information, if applicable, of RLS is disclosed in Item 10 of this Brochure.

Performance-Based Fees

RLS is not compensated by performance-based fees.

Material Disciplinary Disclosures

No management person at RLS Private Wealth Consulting, Inc. has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

Material Relationships That Management Persons Have With Issuers of Securities

RLS Private Wealth Consulting, Inc., nor Rhonda Staelgraeve-Secor, have any relationship or arrangement with issuers of securities, in addition to what is described in Item 10.

Conflicts of Interest

Pursuant to California Code of Regulations Section 260.238 (k) any material conflicts of interest regarding the investment adviser, its representatives or any of its employees are disclosed to the Client prior to entering into any Advisory or Financial Planning Agreement.

Business Continuity Plan

RLS Financial maintains a written Business Continuity Plan that identifies procedures related to an emergency or significant business disruptions, including the death of the investment adviser or any of its representatives.



343 Pacheco Creek Lane Hollister, California 95023

(559)999-2620

www.rlswealthconsulting.com

Form ADV Part 2B – Brochure Supplement

Dated: January 18, 2024

For

Rhonda Staelgraeve-Secor

President, Wealth Consultant, and Chief Compliance Officer

This brochure supplement provides information about Rhonda Staelgraeve-Secor that supplements the RLS Private Wealth Consulting, Inc. ("RLS") brochure. A copy of that brochure precedes this supplement. Please contact Rhonda Staelgraeve-Secor if the RLS brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Rhonda Staelgraeve-Secor is available on the SEC's website at www.adviserinfo.sec.gov which can be found using the identification number 2886672.

Item 2: Educational Background and Business Experience

Rhonda Staelgraeve-Secor

Born: 1974

Educational Background

- 2014 Master's in Personal Financial Planning, College for Financial Planning
- 1996 Bachelor's in Business Administration Legal Environment Option, California State University Fresno

Business Experience

- 04/2016 Present, RLS Private Wealth Consulting, Inc., President Wealth Consultant and CCO
- 09/2012 04/2016, Stay at home Mom
- 11/2012 10/2014, College for Financial Planning, Student
- 10/2003 09/2012, Wells Fargo Bank/Wells Fargo Investments, LLC. Dual employee: Private Banker 2003-2006, Wealth Advisor 2006-2012

Professional Designations, Licensing & Exams

CFP (Certified Financial Planner)®: The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with Clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a bachelor's degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination Pass the comprehensive CFP® Certification Examination. The examination includes case studies and Client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real-world circumstances;
- Experience Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and

- Ethics Agree to be bound by CFP Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.
 - Individuals who become certified must complete the following ongoing education and ethics requirements to maintain the right to continue to use the CFP® marks:
- Continuing Education Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their Clients.
 - CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Master Planner Advanced Studies® (MPAS®) Individuals who hold the MPASSM designation have completed a Master of Science degree with a major in personal financial planning. The program consists of 36-43 semester credits and delves deeply into personal financial planning or investment-related content using research-based coursework and real-world case studies. Graduates of the program are required to demonstrate critical thinking skills and complex problem-solving techniques. Additionally, individuals must complete assignments, projects, research, and papers and meet all graduation requirements for the Master of Science degree.

All designees have agreed to adhere to Standards of Professional Conduct and are subject to a disciplinary process. Designees renew their designation every two years by completing 40 hours of content-specific continuing education, reaffirming adherence to the Standards of Professional Conduct, and complying with self-disclosure requirements.

Certified Exit Planning Advisor® (CEPA®): Individuals who hold the CEPA credential have completed a mastery class on business exit planning focused on the value acceleration methodology provided through the Exit Planning Institute (EPI). The program integrates exit strategy into business, personal, and financial goals of the business owner in a concept called Master Planning. Master Planning focuses on maximizing Business Value, Personal Financial Planning, and Life After Business Planning. Through this credential, exit planning is laser-focused on what business owners can do in the present to grow the value of their business and drive income. The credentialing program focuses on business and personal readiness, financial preparedness, internal and external exit strategies, and team collaboration while advising business owners. CEPA credential holders must have a Bachelor degree and five years or more, full-time, or equivalent, experience working directly as either a professional advisor, former/current business owner, or similar professional capacity.

The Certified Exit Planning Advisor® (CEPA®) credential must be renewed every three years by completing a minimum of 40 hours of exit planning related professional education and reaffirming adherence to the EPI Professional Standards and Code of Ethics.

Item 3: Disciplinary Information

Rhonda Staelgraeve-Secor has never been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

Item 4: Other Business Activities

Rhonda Staelgraeve-Secor. serves as the treasurer and CFO for the San Benito Dance Foundation, Hollister, CA. This is a volunteer position and tasks are performed on evenings and weekends.

Item 5: Additional Compensation

Other than the consulting fee negotiated with clients, Rhonda Staelgraeve-Secor does not receive any economic benefit from any person, company, or organization, in exchange for providing Clients advisory services or referrals to third-party product or service providers through RLS.

Item 6: Supervision

Rhonda Staelgraeve-Secor, as President, Wealth Consultant and Chief Compliance Officer of RLS, is responsible for supervision. She may be contacted at the phone number on this brochure supplement.

Item 7: Requirements for State Registered Advisers

Rhonda Staelgraeve-Secor has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.