

Date: March 10, 2021

RSW Investments Holdings, LLC Client Relationship Summary (Form CRS)

Introduction

RSW Investments Holdings, LLC (“RSW Investments”) is registered with the Securities and Exchange Commission as an investment adviser. Brokerage and investment advisory services and fees differ, and it is important for you to understand these differences. Free and simple tools are available to research firms and financial professionals at <https://www.investor.gov/CRS>, which also provides educational materials about broker-dealers, investment advisers, and investing.

What investment services and advice can you provide me?

RSW Investments offers investment advisory services to retail investors primarily through wrap fee programs sponsored by financial institutions that are not affiliated with us. We manage municipal bond portfolios and require a minimum account size that varies by strategy, but that starts at \$250,000. Once you or your financial professional select one or more of our investment strategies, RSW Investments manages your assets according to the selected strategy(ies).

We typically have the authority to decide the investments to make in your account and to execute trades in that account, as well as to deduct our advisory fee, while our agreement with you is active. However, you may place reasonable restrictions on the types of investments we can make and on our ability to deduct our fee from your account. As a standard service, we monitor client accounts for consistency with our strategy’s objectives and for compliance with any account restrictions. Our monitoring activities take place as trades are entered as well as on a periodic basis.

For additional information, please see our [Form ADV, Part 2A Brochure \(Items 4 and 7\)](https://adviserinfo.sec.gov/firm/summary/302023) found at <https://adviserinfo.sec.gov/firm/summary/302023>. If you invest through a wrap fee program, please refer to the program sponsor’s Form CRS for information regarding their services.

Key Questions to Ask:
<i>Given my financial situation, should I choose an investment advisory service? Why or why not?</i>
<i>How will you choose investments to recommend to me?</i>
<i>What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?</i>

What fees will I pay?

We charge advisory fees that are calculated as a percentage of the market value of the portfolio. This means that the more assets that we manage, the higher our fee. For this reason, we may have an incentive to encourage you to increase the assets in your account. If you invest through a wrap-fee program, our advisory fees are paid out of the wrap program fee collected by the program sponsor on a frequency determined by the sponsor. Wrap program fees are higher than typical asset-based advisory fees, because they may include our advisory fee, the program sponsor’s fee, brokerage commission or other transaction charges, and custodial fees. If your account is managed directly by RSW Investments rather than through a wrap fee program, our fees include our advisory services but do not cover any transaction or custodial fees, which will be charged to you separately. Our fee schedule and billing frequency are negotiable for direct accounts.

A wrap fee program sponsor may invest any cash held in your account into investment vehicles, such as mutual funds, that have internal fees and expenses that will be deducted from your return on those investments. RSW Investments does not receive any compensation from those investments made in your portfolio.

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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.

For more information about your fees and costs, please see our [Form ADV Part 2A Brochure \(Item 5\)](https://adviserinfo.sec.gov/firm/summary/302023) found at <https://adviserinfo.sec.gov/firm/summary/302023>.

Key Question to Ask: Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?

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 interest 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.

RSW Investments' only form of cash compensation is our advisory fee received from clients. From time to time, our financial professionals receive non-cash benefits in the form of gifts, entertainment and educational events from broker-dealers and service providers. Receipt of these benefits creates an incentive to use those providers even though it may not be in a client's best interest. To ensure that trades made through broker-dealers are in clients' best interests, we have implemented policies and procedures to select and monitor broker-dealers based on their execution costs and services, rather than on any conflicts of interest we may have.

Key Question to Ask: How might your conflicts of interest affect me, and how will you address them?

How do your financial professionals make money?

Our financial professionals are compensated with salary and an opportunity for a cash bonus paid at the chief executive officer's discretion based on the firm's financial success, the professional's job performance, and investment performance of client accounts that the professional services. Compensation based on performance may give rise to a professional taking undue risk in client portfolios to increase his/her bonus.

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

- No
- Visit <https://www.investor.gov/CRS> for a free and simple search tool to research our firm and our financial professionals.

Key Question to Ask: As a financial professional, do you have any disciplinary history? For what type of conduct?

Additional Information

- For additional information about our services, please visit our website at www.rswinvestments.com.
- To request up-to-date information or a copy of this Client Relationship Summary, please call 908-608-9600.

Key Question to Ask: 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?