



## RUNNYMEDE CAPITAL MANAGEMENT, INC.

### Item 1 – Introduction

Runnymede Capital Management, Inc. (“Runnymede”, “we” or “us”) is registered with the Securities Exchange Commission (“SEC”) as a Registered Investment Adviser (“RIA”). As an RIA, our services and compensation structure differ from that of a registered broker-dealer, and it is important for you to understand the differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](http://Investor.gov/CRS). The site also provides educational materials about broker-dealers, investment advisers and investing.

### Item 2 – Relationships and Services

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

We provide investment advisory services, including discretionary investment management and, to the extent requested, financial planning and consulting services to individuals, trusts, and estates (our “retail investors”).

When a retail investor engages us to provide investment management services we shall monitor, on a continuous basis, the investments in the accounts over which we have investment authority as part of our investment management service. Furthermore, when engaged on a discretionary basis, we shall have the authority, without prior consultation with you (unless you impose restrictions on our discretionary authority), to buy, sell, trade and allocate the investments within your account(s) consistent with your investment objectives. Our discretionary authority over your account(s) shall continue until our engagement is terminated.

When a retail investor requests that we provide financial planning and consulting services, we rely upon the information provided for our review and do not verify or monitor any such information while providing this service. Our financial planning and consulting services are typically included as an aspect of our investment management services and are only available on a standalone basis in very limited circumstances.

We do not limit the scope of our investment advisory services to proprietary products or a limited group or type of investment.

We generally impose an account minimum of \$750,000 for investment management services and a minimum annual fee of \$2,500. We may, in our sole discretion, reduce or waive either or both of these requirements based upon certain criteria (i.e. anticipated future earning capacity, anticipated future additional assets, related accounts, account composition, negotiations with client, etc.).

**Additional Information:** For more detailed information about our *Advisory Business* and the *Types of Clients* we generally service, please see Items 4 and 7, respectively in our [ADV Part 2A](#).

*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 qualifications? What do these qualifications mean?*

### Item 3 – Fees, Costs, Conflicts, and Standard of Conduct

#### *What fees will I pay?*

We generally provide our investment advisory services on a fee-only basis. When engaged to provide investment management services, we shall charge a fee calculated as a percentage of your assets under our management (our “AUM Fee”). Our annual AUM Fee is negotiable based on a variety of factors, including the amount of assets placed under our management, the complexity of the engagement, and the level and scope of the overall investment advisory services to be rendered. Our maximum AUM Fee is 1.25%. We typically deduct our AUM Fee from one or more of your investment accounts, in advance, on a quarterly basis, unless otherwise agreed. Because our AUM Fee is calculated as a percentage of your assets under management, the more assets you have in your advisory account, the more you will pay us for our investment management services. Therefore, we have an incentive to encourage you to increase the assets maintained in accounts we manage.

In the limited event we accept a standalone financial planning and consulting client, our fees will be assessed on an hourly rate or fixed fee basis, generally ranging from \$300 to \$400 per hour, or up to \$2,000 for fixed fee engagements.

**Other Fees and Costs:** Your investment assets will be held with a qualified custodian. Custodians charge brokerage commissions and/or transaction fees for effecting certain securities transactions (i.e. transaction fees may be charged for certain mutual fund transactions). To the extent applicable, all such brokerage commissions are assessed in accordance with the relevant broker-dealer/custodian's brokerage commission and transaction fee schedules. In addition, relative to all mutual fund and exchange traded fund purchases, certain charges will be imposed at the fund level (e.g. management fees and other fund expenses).

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.

*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?*

**Additional Information:** For more detailed information about our fees and costs related to our management of your account, please see Item 5 in our [ADV Part 2A](#).

***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:

\* We may recommend a particular custodian from whom we receive support services and/or products, certain of which assist us to better monitor and service your account.

\* We may recommend rollovers out of employer-sponsored retirement plans and into Individual Retirement Accounts that we manage for an asset-based fee, which could have the effect of increasing our compensation.

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

**Additional Information:** For more detailed information about our conflicts of interest, please review our [ADV Part 2A](#).

***How do your financial professionals make money?***

Our financial professionals are also partial owners of Runnymede and are most commonly compensated through ownership distributions. The compensation received by our financial professionals, therefore, is based, primarily on the revenue and overall profitability of Runnymede. Accordingly, our financial professionals have a conflict of interest for recommending Runnymede to retail investors for investment advisory services, as the recommendation could be made on the basis of compensation to be received, rather than on a client or prospective client's best interests. You should discuss your financial professional's compensation directly with your financial professional.

#### **Item 4 – Disciplinary History**

Do you or your financial professionals have legal or disciplinary history? No.

We encourage you to visit [www.investor.gov/CRS](http://www.investor.gov/CRS) to research our firm and our financial professionals. Furthermore, we encourage you to ask your financial professional: *As a financial professional, do you have any disciplinary history? If so, for what type of conduct?*

#### **Item 5 – Additional Information**

Additional information about our firm is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You may contact our Chief Compliance Officer at any time to request a current copy of your ADV Part 2A or our *relationship summary*. Our Chief Compliance Officer may be reached by phone: (973) 267-6886. *Who is my primary contact person? Is he or she a representative of an investment adviser or broker-dealer? Who can I talk to if I have concerns about how this person is treating me?*

A copy of our Part 2A is available at:

[https://files.adviserinfo.sec.gov/IAPD/Content/Common/crd\\_iapd\\_Brochure.aspx?BRCHR\\_VRSN\\_ID=616795](https://files.adviserinfo.sec.gov/IAPD/Content/Common/crd_iapd_Brochure.aspx?BRCHR_VRSN_ID=616795)