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A Registered Investment Adviser Firm

IARD/CRD Number: 147309
SEC Number: 801-69651

RDAFN Wrap Fee Program Brochure

June 16th, 2015

This Wrap Fee Brochure provides information about the qualifications and business practices of **RDA Financial Network, Inc.** If you have any questions about the contents of this brochure, please contact us at Phone: 888-300-4975 or help@RDAFN.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

"Registration does not imply a certain level of skill or training."

Additional information about **RDA Financial Network, Inc.** also is available on the SEC's website at: www.adviserinfo.sec.gov.

Item 2 Material Changes

RDA Financial Network, Inc's (RDAFN) last Form ADV Part II and Wrap Fee Brochure amendments were drafted on October 15, 2010

We lowered our maximum allowable fee for RDA Proprietary Strategies from 2.5% to a maximum 1.6%. For additional information on this material change please review Item 4 on page 5.

We revised our description of our disclosures regarding Additional Services Program Agreement with TDAmeritrade, Inc. For additional information on this material change please review Item 9 on page 9.

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Item 4 Services, Fees and Compensation

RDA Financial Network, Inc. (RDAFN) is registered as an investment adviser with the Securities and Exchange Commission since October 2008. RDAFN is notice filed in Iowa and all other states where it conducts business and is required to be notice filed.

Investment Management Services - RDAFN provides Investment Management Services, defined as giving continuous advice to clients based on their individual needs through RDAFN's Investment Management Services. RDAFN will obtain financial information from prospective clients to determine the suitability of RDAFN's Investment Management Services for prospective clients and to determine the appropriate investment objectives that are specific for each client account that is established with RDAFN.

Sub-Advisor Services - In some instances, Investment Management Services Accounts may be managed by independent Sub-Advisors that have Sub-Advisory agreements with RDAFN. In such circumstances, the Sub-Advisor will have discretionary power and trading authority for the investment of the Account. RDAFN and IAR shall be responsible for making the suitability determination in what investment strategy will be implemented in the management of Client's Account by Sub-Advisor. Sub-Advisor will also provide administrative services which may include the calculating and processing for payment of advisory fees on behalf of RDAFN. Sub-Advisor may perform other administrative duties on behalf of RDAFN.

Discretionary Trading - RDAFN, IAR or Sub-Advisor will buy, sell, exchange, convert, tender and otherwise trade on a discretionary basis mutual funds, variable annuities and life contracts, and the sub-accounts thereof, general securities including stocks, bonds, CMOs, REITs, ETFs, unit investment trusts and other securities, and if authorized independently, to purchase or write options to purchase or sell securities, consistent with investment analysis, interpretations and judgments designed to seek an investment return suitable to the investment objectives and goals of the Client, subject, however, to any limitations established by the Client and acknowledged by RDAFN.

WRAP Fee Custodian/Broker-Dealer Arrangements - RDAFN shall consider a number of factors including, without limitation, best execution, the overall direct net economic impact on account assets (including commissions which may not be the lowest available, but which will not be higher than the generally prevailing competitive range) the financial stability of the Custodian/Broker-Dealer, the efficiency with which the transaction is effected, the ability to effect the transactions where complicating factors are involved, the availability of the Custodian/Broker-Dealer to stand ready to execute possible difficult transactions in the future, and other matters involved in the receipt of brokerage and research services. RDAFN has Wrap Fee Custodian/Broker-Dealer arrangements with:

- TD Ameritrade, Inc.
- Cambridge Investment Research, Inc./Pershing, LLC
- Cambridge Investment Research, Inc./National Financial Services, LLC
- Charles Schwab
- TIAA-CREF
- Fidelity Investments

(Collectively referred to as Custodian/Broker-Dealers)

RDAFN will recommend these Custodian/Broker-Dealers to clients for custody and brokerage services. These Custodian/Broker-Dealers' advisory accounts custody and brokerage services are typically not available to retail investors. These benefits include the following products and services (provided without cost or at a discount):

- Duplicate client statements and confirmations;
- Research related products and tools;
- Consulting services;
- Access to a trading desk serving advisor participants;
- Access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts);
- The ability to have advisory fees deducted directly from client accounts;
- Access to an electronic communications network for client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to RDAFN by third party vendors.

Some of the products and services made available by these Custodian/Broker-Dealers may benefit RDAFN but may not directly benefit client accounts. These products or services may assist RDAFN in managing and administering client accounts, including accounts not maintained at these Custodian/Broker-Dealers. Other services made available by these Custodian/Broker-Dealers are intended to help RDAFN manage and further develop its business enterprise. The benefits received by RDAFN do not depend on the amount of brokerage transactions directed to these Custodian/Broker-Dealers. Clients should be aware, however, that the receipt of economic benefits by RDAFN or its related persons in and of itself creates a potential conflict of interest and may indirectly influence RDADFN's choice or recommendation of these Custodian/Broker-Dealers for custody and brokerage services.

Trading – RDAFN allocates trades to clients in a fair and equitable manner that will be applied consistently to all clients. Personal accounts of RDAFN, its investment advisor representatives, Associates and family members will not be treated more favorably than any other client account. RDAFN will make every attempt to completely fill all block order trades. In the event where there is a partial fill of the trade the trade will be allocated as follows: Small (100 share) and odd lot positions filled in entirety then prorated across the remaining shareholders. All variable annuities managed within the Investment Management Program by RDAFN will have their variable annuity sub-account transactions processed through the Custodian of record for the variable annuity.

Trading Error Corrections - It is RDAFN's policy to ensure clients are made whole following a trade error. Specifically, when a trade error occurs in a client account that results in a loss, the responsible part y will reimburse the client. The responsible party may include RDAFN, RDAFN IARs, Cambridge or a Custodian/Broker-Dealer. If the trade error was made in a client account resulting in a gain, the client will keep the gain. If the trade error was made in a block trading account and client funds were not at risk and the trade results in a gain, RDAFN will keep the gain unless the Custodian/Broker-Dealer keeps the gain.

Additional Information on RDAFN's Relationship with Cambridge - Cambridge and clearing broker/dealers (i.e. NFS and/or Pershing) also make available to RDAFN other products and services that benefit RDAFN but may not directly benefit its clients' accounts. Some of these other products and services assist RDAFN in managing and administering client accounts. These include software and other technology that provide access to client account data (such as trade confirmation and account statements); facilitate trade execution; provide research, pricing information and other market data; facilitate payment of RDAFN's fees from its clients' accounts; and assist with back-office functions; recordkeeping and client reporting. Many of these services generally may be used to service all or a substantial number of RDAFN's accounts, including accounts not held through Cambridge. Broker-Dealer and Custodian fees, expenses, and commission charges are separate and distinct from the fee charged by RDAFN.

Custody - All client account and asset are held by independent custodians. Under no circumstances will RDAFN maintain custody of Client accounts or assets. RDAFN' only has custody to the extent it needs to have Advisory Fees deducted from client accounts.

Agreement Termination - Investment Management Agreements may be terminated by RDAFN or the Client by giving to the other party written notice at least thirty (30) days prior to the date on which the termination is to be effective. Any prepaid, unearned fees will be refunded upon written request, determined on a pro-rata basis to the Client. There is no termination fee; however, the account(s) may be subject to fees or charges related to transferring an Account.

Investment Management - Assets Under Management
RDAFN has $323,100,509 of assets under discretionary management in its Investment Management Services as of December 31, 2014.

Retirement Plan Services – ERISA Section 3(38) Discretionary Fiduciary Services Assets Under Advisement
RDAFN has $316,819,462 of assets under discretionary advisement in Retirement Plan Services as of December 31, 2014.

Investment Management Fees - RDAFN manages client accounts for a percentage of the assets under management. RDAFN charges an annualized Advisory Fee that ranges from .5% up to 2.5%, depending on the size and complexity of the client account or retirement plan.

The initial Advisory Fee shall be calculated from the date on which assets or cash were first deposited to the Account to the last day of the calendar quarter in which such deposits were made (or, at RDAFN's option, through the last business day of the next calendar quarter if the date the account is accepted by RDAFN falls within 30 days prior to the beginning of a calendar quarter). The Account Value for the purposes of calculating the initial Advisory Fee is the value on the last day of the calendar quarter. If additional assets are deposited to the Account(s) during a fee period, Client will be charged additional Advisory Fees based on the value of the additional assets, prorated for the number of days remaining in such fee period.

The Advisory Fee will normally be charged on a quarterly basis, payable in advance, and will be billed based on the value of the assets under management on the last day of the prior reporting period. Debit balances due to the use of margin will be ignored for the purposes of calculating fees. If an Account is opened by transferring assets from an existing RDAFN Account, then the Advisory Fee will not be assessed until the beginning of the quarter following execution of this Agreement. If an Account is closed by transferring assets to a new Account managed by RDAFN or Sub-Advisor, then the Advisory Fee for the quarter shall not be prorated to the date of transfer.

RDAFN will compensate Sub-Advisors up to 1.50% for their investment management services and administrative services for sub-advised accounts. Sub-Advisor compensation may increase client's Advisory Fees.

RDA Proprietary Strategies –RDAFN proprietary strategies have a maximum fee allowable of 1.6%. These strategies include RDA Alpha, Bull Bear, Aggressive Bull Bear, Core & Explore I & II, RDA PIP, RDA Fixed, RDA Alternative, and RDA University Strategies.

General Investment Management Fee Disclosures - Client may have Advisory Fees paid from other accounts or custodians, or be billed directly by invoice, in such cases Advisory Fee deductions will be noted as zero on the client's monthly Custodian statements.

Clients may incur certain charges imposed by third parties other than RDAFN in connection with investments placed in an Investment Management account, including but not limited to:

- IRA and Qualified Retirement Plan Fees, and other custodial fees; and
- Mutual fund and variable annuity internal expenses, commissions, sales loads, 12(b)-1 fees, trail fees and surrender charges, portions of which may be received by RDAFN IAR in their capacities as registered representatives of Cambridge. The purchase of mutual fund shares in client's account can result in certain processing and mailing charges that are not incurred when shares are purchased directly from the mutual fund company.

Advisory Fees paid by clients in RDAFN's Wrap Fee Program may be more than the cost of purchasing the same services separately or similar services elsewhere. RDAFN's Wrap Fee Program Advisory Fees are negotiable.

Item 5 Account Requirements and Types of Clients

RDAFN generally provides investment advice to the following:

- Individuals
- Profit sharing plans and participants
- Pensions and other retirement plans
- Corporations or other business entities
- Trust, estates, or other charitable organizations

Account Minimums - RDAFN's recommended minimum investment amount for establishing and maintaining an Investment Management Program account with RDAFN is $25,000. Exceptions may be granted to this minimum at the discretion of RDAFN.

Item 6 Portfolio Manager Selection and Evaluation

RDAFN IARs obtain financial information from prospective clients to determine the suitability of RDAFN's Investment Management Service and to determine the appropriate investment objectives that are specific for each client account that is established with RDAFN. Each IAR gives investment advice to his or her clients based on what is suitable for each client.

- It is the IARs duty to determine whether a client's account will be managed by the IAR, placed in a RDAFN Investment Strategy model or with an approved sub-advisor. Clients may impose restrictions on investing in certain securities or types of securities.
  - When the IAR is the portfolio manager on a client account there is a potential conflict of interest regarding the trading of the account to the advantage of the IAR or other clients and the potential higher fee split that may go to the IAR.
  - These potential conflicts and other potential conflicts are addressed in RDAFN's Code of Ethics, compliance policies and supervision review policies referenced below in **Item 9 Additional Information**.
- Clients receive quarterly performance reports from RDAFN describing account performance and holdings. Each account's performance is compared to its corresponding investment objective benchmark. All benchmarks are based on well-known investment industry indices.

- Clients will receive a monthly account statement from the Custodian showing the account activity as well as positions held in the account at month's end. No less than on a quarterly basis, client will receive a statement from the Custodian for transactions and holdings.
- Reviews are conducted for all accounts on a quarterly basis. Each IAR reviews his or her client accounts. They are instructed to review investment performance, suitability, appropriate asset allocation, and to monitor the account for any changes or updates that are needed (among other things).

METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

Methods of Analysis - RDAFN will obtain financial information from prospective clients on a Client Investment Profile Questionnaire and other new account documents to determine the suitability of RDAFN's Investment Management Program and to determine the appropriate investment objectives that are specific for each client account that is established with RDAFN. Each IAR gives investment advice to his or her clients based on what is suitable for each client. Reviews are conducted for all accounts on an ongoing basis. Each IAR reviews his or her client accounts. They are instructed to review investment performance, suitability, appropriate asset allocation, and to monitor the account for any changes or updates that are needed (among other things). Clients establishing and maintaining Investment Management Program accounts may receive quarterly performance reports from RDAFN showing the investment performance of their accounts. Investing in securities involves risk that clients should be prepared to bear.

The members of RDAFN's Investment Committee manage and review RDAFN's Investment Strategy models and conducts due diligence and approval of Sub-Advisors.

- **RDA Proprietary Strategies –** RDA's Investment suite of strategies include, but are not limited to strategies focused on capital preservation to offensive model strategies. Their primary directive is to offer investors a portfolio designed to meet their investment objectives while staying within their risk parameters. We use quantitative and qualitative analysis to work toward this goal. Our trading strategies range from a complex algorithm program developed by RDAFN money managers to fundamental asset bottom up/top down investment strategies. The technical nature of the Algorithm is not deviated from and the actual algorithm has not to date been modified. Actual client asset trading results may be materially lower. Our models show the diversity of asset classes and are actively traded to manage risk. Everyone is unique and every portfolio is unique. Your portfolio will have its own distinct characteristics within the risk parameters established. After taking the risk tolerance questionnaire, the appropriate combination of equity and fixed income will be recommended that is the right approach for you.

- **General Investment Strategy Guidelines for RDAFN IARs that Manage Client Accounts outside of RDAFN's Proprietary Investment Suite of Strategy Programs -** RDAFN IARs conduct fundamental security analysis when managing client accounts. RDAFN IARs primary investment strategies are based on investing for the long term (over a year). However, short-term (under a year) strategies are also utilized to introduce additional asset classes to a portfolio or reduce exposure to a primary asset class due to current market conditions. IARs review managed accounts on a daily basis. In addition, the executive team monitors portfolios on a monthly basis and the registered principal approves all transactions on a daily basis.

- **Sub-Advisor Services -** In some instances, Investment Management Services Accounts may be managed by independent Sub-Advisors that have Sub-Advisory agreements with RDAFN. In such circumstances, the Sub-Advisor will have discretionary power and trading authority for the investment of the account.

RDAFN, IAR or Sub-Advisor will buy, sell, exchange, convert, tender and otherwise trade on a discretionary or non-discretionary basis mutual funds, variable annuities and life contracts, and the sub-accounts thereof, general securities including stocks, bonds, CMOs, REITs, ETFs, unit investment trusts and other securities, and if authorized independently, to purchase or write options to purchase or sell securities, consistent with investment analysis, interpretations and judgments designed to seek an investment return suitable to the investment objectives and goals of the Client, subject, however, to any limitations established by the Client and acknowledged by RDAFN. Individual RDAFN investment strategies can and do involve the frequent trading of securities which can affect investment performance particularly through increased brokerage charges, other transaction costs and taxes.

Risk of Loss - There are risks inherent in all financial decisions and transactions. RDAFN and RDAFN IARs cannot guarantee the current or future performance of client accounts, or the success of any investment decision or strategy that RDAFN and RDAFN IARs may use with client accounts.

Voting Client Securities - RDAFN, IAR and Sub-Advisor are expressly precluded from taking any action on behalf of or rendering any advice to Client with respect to (a) the voting of proxies solicited by, or with respect to, the issuers of any securities held in a client account; or (b) legal proceedings involving securities or other investments presently or

formerly held in a client account, or the issuers thereof, including bankruptcies. RDAFN, IAR or Sub-Advisor will send to Client all such proxy and legal proceeding information and documents it receives for action as the Client deems appropriate.

Performance-Based Fees Advisory Business - RDAFN does not conduct any Performance-Based Fees advisory business.

Item 7 Client Information Provided to Portfolio Managers

RDAFN IARs obtain financial information from prospective clients to determine the suitability of RDAFN's Investment Management Service and to determine the appropriate investment objectives that are specific for each client account that is established with RDAFN. Each IAR gives investment advice to his or her clients based on what is suitable for each client. Client account information is updated on an ongoing basis. If the IAR and client use a RDAFN Investment Strategy Model in the management of the client's account the Sub-Advisor will have viewing access to client's account information.

Item 8 Client Contact with Portfolio Managers

As a general rule, the IAR for each client account is the primary communicator and is responsible for making account suitability determinations and updates. However, Investment Committee members and Sub-Advisors are available to talk to clients during regular business hours.

Item 9 Additional Information

Disciplinary Information - RDAFN has no current disciplinary information to report to the public, clients or prospective clients. RDAFN IARs have no current disciplinary information to report to the public, clients or prospective clients.

BROKER-DEALER AND OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

RDAFN is not registered as a broker-dealer, futures commission merchant, commodity pool operator or commodity trading advisor and will not become registered in any of these capacities. RDAFN's IARs are not associates of a futures commission merchant, commodity pool operator or commodity trading advisor. RDAFN's IARs will not become registered or associated in any of these capacities.

Broker-Dealer Affiliation with Cambridge Investment Research, Inc. (Cambridge) – RDAFN's IARs are licensed as registered representatives of Cambridge a registered broker-dealer with the Securities & Exchange Commission (SEC) and the Financial Industry Regulatory Authority (FINRA), and a member of the Securities Investor Protection Corporation (SIPC). RDAFN IARs encourages clients to use not only their investment advisory services, but their broker-dealer services as well. Cambridge offers a full range of investment products and services. Cambridge broker-dealer commissions are comparable to other full services brokers. Some advice offered by the IARs may involve investments in mutual funds and variable annuity products which pay 12b-1 trail fees. IARs may receive a portion of these 12b-1 trail fees in their separate capacity as registered representatives. Clients should be aware that the payment and receipt of these commissions and fees could represent an incentive for the IARs to recommend mutual funds or variable annuities that pay 12b-1 trail fees or pay higher 12b-1 trail fees over funds with no 12b-1 fees or lower fees, thus creating a potential conflict of interest.

Commissions may be higher or lower at Cambridge than at other broker/dealers. Cambridge registered representatives associated with RDAFN may have a conflict of interest in having clients purchase securities and/or insurance related products through Cambridge in that the higher their production with Cambridge the greater potential for obtaining a higher pay-out on commissions earned. Further, registered representatives are restricted to only offering those products and services that have been reviewed and approved for offering to the public by Cambridge and for which Cambridge and its clearing firms, National Financial Services, LLC and Pershing, LLC, has obtained a selling agreement.

Cambridge Equity Participation Program - John W. Arthur has entered into an Equity Participation Plan with Cambridge. Under this arrangement, John W. Arthur has the ability to earn a percentage of Cambridge's overall profit ratio. John W. Arthur is not an owner or officer of Cambridge. However, John W. Arthur is eligible to participate in the Equity Participation Plan due to his affiliation as a registered representative of Cambridge. The arrangement between John W. Arthur and Cambridge is a potential conflict of interest between RDAFN and its clients in that it may inhibit RDAFN's independent judgment concerning the best execution services offered by Cambridge.

Continuity Partners Group, LLC - John W. Arthur and Duane Roth are partners and have invested in Continuity Partners Group, LLC (CPG). CPG is a related company of Cambridge. CPG was formed by Cambridge primarily to provide tools and programs to certain Cambridge registered representatives, such as RDAFN's IARs that are also registered representatives with Cambridge. CPG tools and programs are designed to enhance the value of partner's retail practices and to provide a source to finance the transitioning of the partner's practices. Subsequent to investing in CPG, partners are eligible to participate in the programs offered by CPG. Programs offered by CPG are designed to improve the continuity of its partners' practices and improve the long term viability of the partners' practices.

John W. Arthur and Duane Roth have purchased units of CPG limited liability company interests ("Units") in exchange for the assignment by John W. Arthur and Duane Roth of a percentage of certain intangible assets to CPG and the assignment to CPG by John W. Arthur and Duane Roth of a percentage of the advisory fees or commissions received by them. In order to become a shareholder of CPG, John W. Arthur and Duane Roth have agreed to assign up to 20% of all fees earned by RDAFN to CPG. Fees are assigned to CPG in return for units of limited liability company interests and in some cases cash consideration from CPG.

In addition to the fee revenue assignment, John W. Arthur and Duane Roth have agreed to contribute or assign a portion of their various practice related assets to CPG. Contributed assets includes CPG's right to receive a portion of the proceeds of any sale of John W. Arthur and Duane Roth practice, a portion of John W. Arthur and Duane Roth's interest in their customer list, and other intangible assets owned by either John W. Arthur and Duane Roth or assets currently held by RDAFN. The arrangement between John W. Arthur and Duane Roth and CPG is a potential conflict of interest between RDAFN and its clients in that it may inhibit RDAFN's independent judgment concerning the best execution services offered by Cambridge.

CPG is registered as an investment advisor with the SEC. CPG is registered as an investment advisor because it acquires the goodwill associated with certain client relationships served by Cambridge registered representatives such as RDAFN's IARs. Correspondingly, CPG will receive a portion of advisory fees generated from such investment advisory client relationships. Advisory fees are paid directly to CPG. It should be noted that CPG does not provide retail brokerage, insurance services or investment advisory services. Clients of RDAFN will not enter into a direct client relationship with CPG.

Insurance Activities and Affiliations - IARs are also licensed as insurance agents, and can provide insurance products and services to clients. As insurance agents they will earn insurance commissions and fees while selling and servicing insurance products and services. Clients should be aware that the payment and receipt of these commissions and fees could create a potential conflict of interest.

Attorney at Law - RDAFN IAR, Michael LaSovage is also independently licensed as an attorney. When providing legal and tax services he may earn legal fees and compensation. These legal and tax services are separate and independent from the advisory services he provides under RDAFN.

Accountant - RDAFN IAR, David Boelman and Jason Shaw are also accountants. When providing accounting services they may earn accounting fees and compensation. These accounting services are separate and independent from the advisory services provided under RDAFN.

RDAFN Compensation for Client Referrals - RDAFN enters into Referral Advisor Agreements with outside Referral Advisors who refer clients to RDAFN. If a referred client enters into an investment advisory agreement with RDAFN, a cash referral fee will be paid to the Referring Advisor, which will be based on a percentage of the advisory fees that are paid by the client to RDAFN. The Referral Advisor Agreement entered into between RDAFN and the Referral Advisor will at all times be in compliance with the rules and regulations under 17 CFR Section 275.206(4)-3 and corresponding state rules and regulations on investment adviser referral activities.

TD AMERITRADE SERVICES AND COMPENSATION

TD Ameritrade's institutional Program - As disclosed under Item 12 in RDAFN's ADV part 2, RDAFN participates in TD Ameritrade's institutional Program and RDAFN may recommend TD Ameritrade to Clients for custody and brokerage services. There is no direct link between RDAFN's participation in the program and the investment advice it gives to its Clients, although RDAFN receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount):

- Receipt of duplicate Client statements and confirmations;
- research related products and tools; consulting services;
- access to a trading desk serving RDAFN participants;

- access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts;
- access to an electronic communications network for Client order entry and account information;
- access to mutual funds with no transaction fees and to certain institutional money managers; and
- discounts on compliance, marketing, research, technology, and practice management products or services provided to RDAFN by third party vendors.

TD Ameritrade may also have paid for business consulting and professional services received by RDAFN's related persons. Some of the products and services made available by TD Ameritrade through the program may benefit RDAFN but may not benefit its Client accounts. These products or services may assist RDAFN in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help RDAFN manage and further develop its business enterprise. The benefits received by RDAFN or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, RDAFN endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by RDAFN or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the RDAFN's choice of TD Ameritrade for custody and brokerage services.

TD Ameritrade Additional Services - RDAFN also receives from TD Ameritrade certain additional economic benefits ("Additional Services") that may or may not be offered to any other independent investment Advisors participating in the program. Specifically, the Additional Services include receiving financial grants towards technology enhancements, in order to utilize NDEX, a portfolio management system, to more effectively and efficiently provide proper compliance with regards to SEC regulations; to provide performance reporting; and to provide enhanced trading capabilities. TD Ameritrade provides the Additional Services to RDAFN in its sole discretion and at its own expense, and RDAFN does not pay any fees to TD Ameritrade for the Additional Services. RDAFN and TD Ameritrade have entered into a separate agreement ("Additional Services Addendum") to govern the terms of the provision of the Additional Services.

RDAFN's receipt of Additional Services raises potential conflicts of interest. In providing Additional Services to RDAFN, TD Ameritrade most likely considers the amount and profitability to TD Ameritrade of the assets in, and trades placed for, RDAFN's Client accounts maintained with TD Ameritrade. TD Ameritrade has the right to terminate the Additional Services Addendum with RDAFN, in its sole discretion, provided certain conditions are met. Consequently, in order to continue to obtain the Additional Services from TD Ameritrade, RDAFN may have an incentive to recommend to its Clients that the assets under management by RDAFN be held in custody with TD Ameritrade and to place transactions for Client accounts with TD Ameritrade. RDAFN's receipt of Additional Services does not diminish its duty to act in the best interests of its Clients, including seeking best execution of trades for Client accounts.

REVIEW OF ACCOUNTS

Review of Accounts - RDAFN will obtain financial information from prospective clients to determine the suitability of RDAFN's Investment Management Service and to determine the appropriate investment objectives that are specific for each client account that is established with RDAFN. Each IAR gives investment advice to his or her clients based on what is suitable for each client. Clients may impose restrictions on investing in certain securities or types of securities. Reviews are conducted for all accounts on an ongoing basis. Each IAR reviews his or her client accounts. They are instructed to review investment performance, suitability, appropriate asset allocation, and to monitor the account for any changes or updates that are needed (among other things).

The members of Investment Committee manage and review RDAFN's Investment Strategy models and conducts due diligence and approval of Sub-Advisors. RDAFN's Investment Strategy models and Sub-Advisor portfolio performances are reviewed through RDAFN's performance reports and against RDAFN's and Sub-Advisor's investment benchmarks.

Members of the Investment Committee include:

- John Arthur, President, Registered Principal, Investment Adviser Representative
- Chris Arthur, Chief Compliance Office, Investment Adviser Representative
- Michael LaSovage, JD, Investment Adviser Representative
- Robert LaSovage, CFA, Investment Adviser Representative
- Rebecca Baedke, Director of Operations

John Arthur is also responsible for supervising RDAFN IARs and their management of client RDAFN Wrap Fee accounts. John Arthur delegates certain supervision responsibilities to Michael Anne Brannen, David Darner, and other designees that report to him. The main reports and documents they review in supervising these activities are the Client Investment Profile Questionnaire, new account documents, trade tickets, confirmations, brokerage statements, performance reports, daily activity reports and planning documents.

Account Reports - Clients will receive quarterly performance reports from RDAFN describing account performance and holdings. Clients will receive a monthly account statement from the Custodian showing the account activity as well as positions held in the account at month's end. No less than on a quarterly basis, client will receive a statement from the Custodian for transactions and holdings.

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

RDAFN has established a Code of Ethics to comply with the requirements of Section 204A-1 of the Investment Advisers Act of 1940 that reflects RDAFN's fiduciary obligations and those of its supervised persons, and requires compliance with federal securities laws. RDAFN's Code of Ethics covers all individuals that are classified as supervised persons. All RDAFN owners and IARs are classified as supervised persons. RDAFN requires its supervised persons to consistently act in the RDAFN clients' best interest in all advisory activities. RDAFN imposes certain requirements on supervised persons to ensure that they meet RDAFN's fiduciary responsibilities to RDAFN clients. This standard of conduct requirement is higher than what is ordinarily required and encountered in business.

- RDAFN and RDAFN's supervised persons may buy, sell and hold securities for their personal accounts, which RDAFN may also recommend to clients, or buy and sell on a discretionary basis for clients. As these situations may present a potential conflict of interest, it is the policy of RDAFN that no supervised person shall prefer their own interest over the interest of RDAFN clients.
- No supervised person employed by RDAFN may buy or sell any security prior to a transaction being implemented for an advisory account.
- No supervised person employed by RDAFN may buy or sell securities for their personal accounts where their decision is derived from information obtained through their employment with RDAFN unless the information is also available to the investing public upon reasonable inquiry.
- RDAFN maintains a list of all securities holdings for all supervised persons, which is reviewed on a regular basis by a principal of the RDAFN.

Conflicts Regarding Other Activities and Affiliations - RDAFN addresses these conflicts through the following **Compliance Oversight Policies**:

Conflicts of Interest – RDAFN must disclose any potential or actual conflicts of interest when dealing with clients.

RDAFN Obligations – RDAFN and its IARs are subject to the following specific obligations when dealing with clients:

- The duty to have a reasonable, independent basis for its investment advice;
- The duty to ensure that investment advice is suitable to meeting the client's individual objectives, needs, and circumstances; and
- A duty to be loyal to clients.

This Code of Ethics response is only intended to provide clients and potential clients with a summary description of RDAFN's Code of Ethics. If current clients or potential clients want to review RDAFN's entire Code of Ethics they may obtain a copy of it by calling RDAFN at (888) 300-4975 or writing to Chris Arthur at RDA Financial Network, Inc. 2475 Coral Court Suite A, Coralville, IA 52241. You may also visit us online @ https://rdafn.com

FINANCIAL INFORMATION

RDAFN has no financial information to report, since RDAFN does not maintain custody of client accounts or assets, and has no financial situations which may impair its ability to conduct business.

How We Use and Protect Personal Information

To RDA Financial Network, Inc., and its Broker/Dealer, Cambridge Investment Research, Inc., protecting your privacy is very important. We value your trust and we want you to understand what information we collect, how we protect it, and how we use it. We treat personal information – nonpublic information that identifies you – with respect, and in accordance with this privacy policy.

Information We May Collect

We may obtain information, much of which comes directly from you, to provide you with products and services you have requested and as we deem appropriate, to determine your eligibility for products and services. We may collect identification and contact information, as well as transaction and investment experience information from applications, transactions with others and us, and from outside companies.

Examples of the Sources and Types of Information We May Collect Include:

- Information about the products and services you purchase through us, including copies or applications, registration forms, or other forms, containing your name, address, telephone numbers, social security numbers, email addresses, investment objectives, income, assets, employment information, and accounts with others;
- Information regarding your brokerage and/or investment advisory transaction history with us, our service providers, such as clearing firms, mutual fund companies, insurance companies, or other companies that provide you with financial products or services including your former broker/dealer or its registered representatives, your current registered representative and their affiliated business;
- Information that other companies who assist us in marketing our own products and services or products we offer jointly with other financial institutions may have, such as your name, address, and telephone number.
- Information under the USA Patriot Act enacted by the United States Treasury Department and Congress to combat terrorism (Investor notification is available upon request).

INFORMATION WE MAY DISCLOSE AND TO WHOM WE MAY DISCLOSE INFORMATION

Neither RDA Financial Network, Inc. nor Cambridge will disclose your personal information to companies or organizations not affiliated with us that would use the information we have provided them to contact you about their own products and services **except as outlined below**. We may disclose all the personal information we collect, as described above, to **our staff, affiliates, representatives, their affiliated businesses,** insurance companies, brokers, banks, Broker/Dealers and investment advisers that provide services to you on our behalf, in the following types of situations:

- Providing administrative, customer assistance, clearing, operational, and other services;
- Preparing, printing and delivering portfolio management performance reports, confirmation statements, and other documents;
- Executing securities transactions;
- Maintaining or developing software for us; and a financial institution (such as banks, investment advisers, or securities firms) with which we have joint marketing arrangements to jointly endorse or offer financial products or services. Neither RDA Financial Network, Inc. nor Cambridge will sell your personal and confidential information to unaffiliated third parties.
- Third party asset managers with whom we have relationships for the management of customer accounts;
- State, Federal, and other regulatory and self-regulatory authorities as required by law or regulation;
- In certain situations, we may share your information with parties that are not affiliated with us, as described below:

We recognize that you have elected to open accounts with us due to the efforts of your Rep/Advisor. If he or she elects to leave our firm for another registered investment advisory firm, we may allow them to take your confidential information with them to the new firm, subject to the requirements or limitations of applicable law. Client information may also be shared with a non-RDAFN affiliated representative and their firm if a RDAFN Rep/Advisor has entered into an agreement to sell all or some portion of their securities, advisory or insurance business to the non-RDAFN affiliated representative.

DISCLOSURES PERMITTED BY LAW

We may also disclose all the information we collect as permitted or required by law. For example, we may disclose information to law enforcement agencies or insurance and securities regulatory agencies.

SECURING YOUR INFORMATION

Our staff, affiliates, representatives, and their staffs are required to follow our policies and procedures to keep your information secure, confidential, and prevent unauthorized use of your personal information. Our physical, electronic, and procedural safeguards have been reasonably designed to protect your information.

INSTRUCTIONS ON HOW TO NOTIFY US

For any questions regarding this policy, please contact your Investment Advisor Representative or call the RDA Financial Network Managing Principal at 888.300.4975. Our home office is located at 2475 Coral Court, Suite A, Coralville, IA 52241.

Investment Advisor Representative	Location	Phone
John Arthur	Coralville, IA	**319.626.3464**
Christopher Arthur	Coralville, IA	319.626.3464
Lucas Bielfelt	Ames, IA	515.292.2020
David Boelman	W Des Moines, IA	515.225.1185
Bradley Bobb	Springfield, IL	217.697.5589
Margaret Brady	Cedar Falls, IA	319.593.1110
Michael Anne Brannen	West Chester, OH	513.844.2111
Stacie Brass	Cedar Falls, IA	319.596.1101
Jacob Chadick	Overland Park, KS	913.693.7684
Daniel Conklin	Cedar Falls, IA	319.626.3464
Donald Dahlstrom	Dayton, IA	515.230.4100
David Darner	Coralville, IA	319.351.7077
Dale Dobnicker	Lima, OH	419.991.3333
Scott Durscher	Waverly, IA	319.596.1100
Chad Ericson	Akron, IA	712.568.3973
Jay Faber	Le Mars, IA	712.546.6111
Michael Forbrook	Carol Stream, IL	630.319.0858
David Lane	Coralville, IA	850.209.0083
James Lane	Coralville, IA	319.626.3464

Investment Advisor Representative	Location	Phone
Michael LaSovage	Lima, OH	419.991.3333
Robert LaSovage	Lima, OH	419.991.3333
Alan Leff	Coralville, IA	319.626.3464
Nate Lovik	Coralville, IA	319.626.3464
Jason Luders	Cedar Falls, IA	319.277.3787
Thomas McBride	W Des Moines, IA	515.224.1322
Wayne Medlang	Cedar Rapids, IA	319.390.2903
Susan Mims	Coralville, IA	319.626.3464
Sagar Patel	Coralville, IA	319.626.3464
Amanda Roberts	O'Fallon, IL	618.632.7684
Duane Roth	O'Fallon, IL	618.632.7684
Duane Roth	Overland Park, KS	913.693.7684
Dana Rucker	Willmar, MN	319.320.5520
Richard Ryan	Cedar Falls, IA	319.277.3787
Jason Shaw	W Des Moines, IA	515.225.1185
Janet Wulf	Cedar Falls, IA	319.596.1101
David Willeumier	Schaumburg, IL	312.235.6878
Richard Yantis	Cedar Falls, IA	319.277.3787