RISE Investment Management, LLC

Part 2A of Form ADV: Firm *Brochure*

November 2026

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This brochure ("Brochure") provides information about the qualifications and business practices of RISE Investment Management, LLC ("RISE", "RISE Investments", "we" or "the Firm"). If you have any questions about the contents of this Brochure, please contact us at 312-620-4492 or clientservice@riseinvestmentsusa.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. Additional information about RISE Investment Management, LLC is also available on the SEC's website at www.adviserinfo.sec.gov. The searchable CRD number for RISE Investment Management, LLC is 333576.

Registration does not imply a certain level of skill or training. Registration solely indicates that RISE Investment Management, LLC has registered its business with the Illinois Secretary of State Securities Department in the category of investment adviser. 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.

Item 2. Material Changes

Since the date of RISE Investment Management, LLC's prior amendment filing of Form ADV Part 2 Brochure in August 2026, the following material changes to this Brochure have been made.

- In November 2026, Thomas Van Spankeren departed his role of Principal at RISE Investments and assigned his membership interest in the Firm to Vincent DeCrow, the Firm's original Founder and Principal. As a result, Vincent DeCrow now has a 100% membership interest in the Firm. Mr. Van Spankeren's departure causes no changes or disruption to the Firm's daily operations or investment advisory services offered to clients. Vincent DeCrow remains the lead advisor for all of the Firm's client relationships.

This Disclosure Document Brochure was updated on November 8, 2026 to reflect the material changes noted above. If in the future, our Brochure, as amended, contains material changes from our last update, we will identify and discuss those changes in this section.

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Item 4. Advisory Business

Description of Advisory Business
RISE Investment Management, LLC ("RISE Investments", "RISE", "we" or "the Firm") is an independent registered investment advisor and provides fee-only investment management and financial planning and consulting services to its clients which consist of individuals, families, businesses, retirement plans, and non-profit organizations. RISE was founded in 2019 in the State of Illinois. RISE is organized as a privately held Limited Liability Company and is owned in entirety by Vincent DeCrow.

Types of Advisory Services Offered
RISE provides two services to clients: investment management and financial planning and consulting.

Investment Management Services
RISE's main business is providing financial planning and discretionary investment advice to clients in separate accounts. We primarily invest each of our client's portfolios in listed individual equity and fixed income securities and funds, such as stocks, bonds, real estate investment trusts ("REITs"), mutual funds, and exchange-traded funds ("ETFs"). As appropriate per client circumstances and suitability, we may also invest a portion of our client's portfolios in privately placed funds and investments, such as private real estate, hedge funds, private equity, private credit, and other non-listed pooled investment vehicles. Some or all of the funds described above may be managed by other independent advisors or investment managers that are discretionarily selected by RISE through a thorough due diligence process. The specific terms and conditions under which a client engages an independent manager are set forth in a written agreement between the independent manager and either RISE or the client.

- Equity Securities: For the individual equity securities portion of our clients' portfolios, we seek to maximize total return over multiple market cycles through a combination of long-term capital appreciation and the receipt of dividend income while maintaining an emphasis on tax efficiency, the preservation of capital, and diversification. We approach buying equities for our clients as if we are part owners of the businesses, not trading their stocks. We look to maximize the investment return we achieve given the client's risk tolerance. Generally, we view risk more so as the odds of a permanent loss of capital than volatility of returns. We believe purchasing stock in competitively advantaged and financially strong businesses at prices substantially less than our assessment of their intrinsic (business) value is the best way to preserve and grow client capital over long periods of time. We place emphasis on asset allocation and diversification, and the companies we invest in are typically a mix of large, mid, and small capitalization companies diversified across various industry sectors.

- Fixed Income Securities: For the fixed income portion of our clients' portfolios, we focus on diligent execution, credit risk, price risk, and reinvestment risk. We take into consideration our client's tax situation, the type of bond and issuer, and general market conditions when we construct bond portfolios for our clients. Depending on the client's needs, market conditions, and pricing, we typically purchase the following types of bonds for our clients:
    - Corporate bonds;
    - U.S. Treasury and government agency bonds;
    - Taxable, tax-free, and alternative minimum tax ("AMT") municipal bonds;
    - Municipal bonds;
    - Foreign Government bonds; and
    - Mortgage-Backed Securities.

  We generally buy individual bonds with the intent to hold to maturity. We do not keep bonds in an inventory for later sale to our clients. We buy bonds for direct allocation to specific client accounts based on the specific client's asset allocation and circumstances. Depending on our specific client's investment objectives, we may build a bond ladder of individual bonds maturing in



different years in order to provide liquidity, an income stream, and to help mitigate both interest rate and reinvestment risks.

- ETFs: We typically invest in ETFs in addition to individual equity or fixed income securities. We believe this is appropriate for diversification and to gain access to specific geographies, industries, and market capitalizations. We leverage both passively and actively managed ETFs as a strategy to give our clients direct exposure to the various markets.

- Open-End Mutual Funds: We may recommend investments in no-load, open-end mutual funds. Similar to ETFs, we believe this is appropriate for diversification or to gain access to specific geographies, industries, and market capitalizations.

- Private Placements: We may recommend privately placed pooled investment vehicles (some of which may be referred to as “hedge funds,” “private equity,” “private debt,” “private real estate,” “fund of funds,” “digital assets”, and other names) for certain clients as appropriate based on the client’s objectives. The usage of all such funds in client portfolios is generally limited to accredited investor clients. The primary investment objectives of using private funds are to provide additional portfolio diversification, exposure to assets and strategies that tend to be less correlated to public markets, to enhance a client’s passive income yield, and to gain exposure to various assets and opportunity sets that may not be obtainable through publicly listed funds and securities. The managers of these vehicles typically have broad discretion in selecting the investments.

- Separately Management Accounts and Turnkey Asset Management Programs: We may also participate in Separately Managed Accounts (“SMAs”) managed by a third-party sponsor and other “turnkey” asset management programs (“TAMPs”), although we do not “sponsor” any such programs. Through the SMA program RISE will select third-party managers which are appropriate to manage the client’s assets. Under this program, the client grants RISE with discretion to make changes to the managers and/or investments if we determine such a change is in the client’s best interest. Factors considered in making this determination include account size, risk tolerance, our conviction in the third-party manager, the investment philosophy of the third-party manager, and the client’s investment objectives. RISE has full discretionary authority to invest and reinvest client assets and retain third-party asset managers who, in turn, have full discretionary authority to invest and reinvest client assets, subject to reasonable restrictions imposed by the client.

We first consult with our clients to identify and understand their financial situation and constraints, which includes factors such as their time horizon, objectives for asset growth, income and liquidity needs, principal protection, risk tolerance, and tax optimization.

Next, based on the above information, we agree upon an investment objective with the client which serves as a guidepost to asset allocation and how we manage the portfolio. The client’s investment objective in tandem with their risk tolerance influences the equity allocation of the portfolio. After working with the client to select an appropriate asset allocation, we generally implement it across the client relationship, or all of the client’s accounts (“allocation group”), to the extent feasible. Generally, we manage an asset allocation at the allocation group level, which means there will be variation as to asset allocation within a specific underlying account. In addition, if a client adds an account to their relationship with us, we will add the account to the existing allocation group, with the agreed-upon asset allocation, unless circumstances dictate otherwise. We meet regularly with our clients to understand their needs, circumstances and objectives, work with our clients’ other advisers, and periodically reviewing the client’s asset allocation. We re-balance portfolios regularly in accordance with market conditions, client circumstances, tax considerations and portfolio positioning. We will consider the client’s individual situation and the nature, position size, and suitability of specific securities when reviewing and making purchase and sale decisions for each of our clients. In this manner, we tailor our investment management services to the needs of our clients.



Our clients may restrict us in the management of their accounts, such as the amount, type, or identity of securities to buy or sell, as long as they are reasonable, consistent with our professional responsibility and investment philosophy, and allow us to substantially implement our investment strategies. Additionally, a client may direct RISE Investments to purchase and maintain certain securities that we will honor as long as they are reasonable, consistent with our professional responsibility and investment philosophy, and allow us to substantially implement our investment strategies

As a fiduciary, we have duties of care and of loyalty to our clients and are subject to obligations imposed on us by the federal and state securities laws. As a result, our clients have certain rights that cannot be waived or limited by contract. Nothing in our agreement with a client should be interpreted as a limitation of our obligations under the federal and state securities laws or as a waiver of any unwaivable rights clients possess.

Financial Planning and Consulting Services
Clients can engage RISE for financial planning and consulting services.

Financial planning is 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 and recommendations designed to achieve his or her stated financial goals and objectives.

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

- Cash Flow and Debt Management: We will conduct a review of a client's income and expenses to determine their 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 and 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.

- 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 for the client 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 children or grandchildren college savings programs (if appropriate).

- Employee Benefits Optimization: We will provide review and analysis as to whether the client, as an employee, are taking the maximum advantage possible of their employer's 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: We offer estate planning services as part of our one-time and recurring Financial Planning services for our clients to assist with general information as it applies to reviews of existing plans, gathering information as it applies to reviews of existing plans, gathering information needed to provide outside first in the creation of documents, and updating existing plans for clients. Estate planning services may also include an analysis of the client's exposure to estate taxes and our advice regarding ways the client may be able 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. Depending on the client's needs and desires for estate planning document review, preparation, or updates, we may engage with EncorEstate Plans, a third-party scrivener service, or provide clients with contact information for attorneys who specialize in estate planning when they wish to hire an attorney for such purposes. From time-to-time, we will participate in meetings or phone calls between the client and their attorney with prior approval or by request by the client.

- Financial Goals: We help clients identify financial goals and develop a plan to reach them. We will identify what the client plans to accomplish, what resources will be needed to make it happen, how much time it may take to reach the goal, and how much should budgeted for the goal.

- Insurance: Review of existing policies to ensure proper coverage for life, health, disability, long-term care, liability, home, and automobile.

- Investment Analysis and Planning: This involves developing an asset allocation strategy to meet clients' financial goals within an agreed upon risk tolerance, providing information on investment vehicles and strategies, reviewing employee stock options, as well as assisting clients in establishing their investment account at a selected broker/dealer 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 their 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 your exposure to major risks that could have a significant 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 the 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 consideration that there is always a possibility of future changes to federal, state, or local tax laws and rates that may impact your situation.

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



A comprehensive financial plan entails recommendations made by the advisor regarding the client's expenses and cashflow, debt management, financial goals, estate planning, education funding, insurance, investment planning and analysis, retirement planning, risk management, and tax minimization strategies, and other applicable financial topics.

Financial planning can be a recurring or non-recurring service. Depending on a client's specific needs, some clients also choose to engage in recurring consulting services after a financial planning engagement has concluded. On average, it can take an advisor between 10 and 20 hours to produce and deliver a comprehensive financial plan.

Consulting services are typically ad-hoc or al a carte financial planning services, as opposed to a comprehensive financial plan. Clients may seek analysis and advice on a variety of topics, which frequently include the topics described above or other financial topics. Consulting services relate to one or several of the aforementioned topics, whereas a comprehensive financial plan typically entails all of the aforementioned topics. Consulting services usually entail advisor recommendations for a course of activity or specific actions to be taken by the client. Consulting services can be one-time or recurring, depending on the client's specific needs. On average, one-time consulting services can take an advisor between 1 and 5 hours to produce and deliver to a client depending on the nature of the client's specific needs.

We may refer clients to other investment providers, accountants, attorneys, and other specialists as necessary. Implementation of recommendations is at the discretion of clients.

Retirement Plan Consulting Services
Our clients can engage us for retirement plan consulting services, where RISE acts as an ERISA Section 3(21) investment co-fiduciary to the Retirement Plan. In this capacity, the Advisor provides recommendations for investment lineups. We do not exercise discretionary authority over the management of plan assets or the execution of fund changes. The services provided are in line with Section 408(b)(2) of ERISA. The Plan Sponsor retains final decision-making authority and discretion over all plan investments. Services included in this capacity include:

- Investment Advice: Advisor shall provide ongoing, non-discretionary investment advice and recommendations regarding the selection, monitoring, and replacement of investment options available to the Plan.

- Fiduciary Status: Advisor acknowledges that it is a fiduciary under Section 3(21)(A)(ii) of the Employee Retirement Income Security Act of 1974 (ERISA) solely with respect to the provision of investment advice provided to the Plan.

- Client Discretion: Client (Plan Sponsor) retains final discretionary authority and responsibility for the implementation of any recommendations provided by the Advisor. The Client may accept, modify, or reject any of the Advisor's investment recommendations.

- Investment Policy Statement (IPS): Advisor shall assist the Plan Sponsor in developing, drafting, and maintaining an Investment Policy Statement, and shall evaluate the Plan's investment lineup against the criteria established therein.

- Plan Participation Education: Advisor shall assist Plan participants with Plan education and enrollment services within the context of the program.

- Retirement Plan Services Analysis: Advisor will conduct an analysis of Client's Retirement Plan to evaluate the services currently provided to the Client by third parties. This analysis includes asset management services, record keeping, administration, customer service, plan participation and

overall plan health. This service will include a cost/benefit analysis, recommendation of alternative vendors and assistance in fee negotiations for proposed vendors.

Tailoring of Advisory Services
RISE offers the same suite of services to all our clients, and our services are tailored to the individual needs of each client based on their financial situation. Advice offered to each specific client is dependent upon the client's current situation (income needs, tax levels, and risk tolerance levels) and is used to construct a client specific plan to aid in the construction of a portfolio that matches the client's goals and objectives. Clients may impose reasonable restrictions on the management of their assets.

Wrap Fee Programs
We do not participate in wrap fee programs.

Assets Under Management
As of November 8, 2026, RISE had $20,817,813 of client assets under management, all of which are managed on a discretionary basis.

Item 5. Fees and Compensation

Investment Management Fees
Investment management services are provided for an annualized fee which is prorated and billed monthly or quarterly, in arrears. The fee is based on the value of assets on the final day of the month or quarter using the tapered schedule listed below. The fee may be prorated up or down based on intra-month or intra-quarter contributions and distributions.

Assets Under Management	Annualized Fee
$100,000 - $999,999	0.80% - 1.00%
$1,000,000 - $2,999,999	0.70% – 0.90%
$3,000,000 - $4,999,999	0.60% - 0.80%
$5,000,000 - $10,000,000	0.50% - 0.75%
$10,000,000 or Above	Negotiable

Example: A client with a $2,000,000 portfolio would pay an effective annual rate ranging from 0.70% - 0.90% depending on their specific needs that they engage us for.

We typically deduct investment management fees directly from client accounts on a monthly or quarterly basis, although clients may request an invoice that can be paid by check or other payment method.

Financial Planning & Consulting Fees
Financial planning and consulting services are billed on a flat fee or hourly basis.

Flat Fee
Flat fees are based on client complexity and the scope of the engagement. Generally, a flat fee is a one-time assessment that may range from $250 to $15,000 or a recurring monthly flat fee that may range from $50 to $1,000. One-time flat fee engagements are complete upon rendering of the service and fees are billed in arrears after services have been rendered. The aforementioned one-time fee is applicable for a client that has engaged us for non-recurring financial planning or consulting services. The exact fee a client will be subject to within the stated range is dependent on the complexity of the client's financial situation and the scope of the financial plan agreed upon with the client. Depending on the scope of estate planning services that the client desires us to include in our Financial Planning services, we may engage with EncorEstate Plans or another third-party scrivener service. In these cases, the total one-time flat fee for Financial Planning services will include and account for any fees payable to EncorEstate Plans or other third-party scrivener service utilized.



Depending on the complexity and scope of the financial plan agreed upon with the client, we may require a retainer fee (to be determined in the sole discretion of the Advisor). A retainer fee secures the client's services and the advisor's availability for future work. Retainer fees are billed in advance of rendering services, but only for services that can be rendered within six months. Retainer fees generally range from 25% to 50% of the total one-time flat fee.

We have a fiduciary duty to our clients, which can include recurring services, advice, and being available for clients as they need us. As such, recurring monthly flat fees are typically applicable for clients that have engaged us for ongoing and recurring consulting services and advice. Recurring monthly flat fees are generally billed monthly, in arrears.

Hourly Fee
RISE's hourly fees are $250/hour advisory related services. Hourly fees are generally billed and invoiced monthly, in arrears.

Retirement Plan Consulting Fees
Retirement Plan consulting services are provided for an annualized fee which is pro-rated and billed quarterly, in arrears. The fee is a fixed percentage based on the average daily balance of Plan assets throughout the quarter. Client represents and determines that any fees paid out of Plan assets are permissible in all respects under the Plan's governing documents and ERISA. The fee does not include fees charged by the Service Provider or investments. Generally, the annual fee may range from 0.25% to 0.75% depending on the amount of Plan Assets. The fee may be paid by the Plan participant or the Plan Sponsor. Fees paid out of Plan assets will be automatically deducted by the Plan's custodian or recordkeeper upon authorization by the Client and remitted directly to the Advisor.

Advisory Fees in General
Although we have established the aforementioned fee schedule(s), we retain the discretion to negotiate or offer alternative fees on a client-by-client basis. Client facts, circumstances and needs are considered in determining the fee schedule. These include the complexity of the client, assets to be placed under management, anticipated future additional assets; related accounts; portfolio style, account composition, reports, among other factors. The specific annual fee schedule is identified in the contract between the adviser and each client. In Illinois, pursuant to Section 130.846 of the Administrative Rules for Registration as Investment Advisor, 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.

Discounts, not generally available to our advisory clients, may be offered to family members and friends of associated persons of our Firm. Lastly, pre-existing advisory clients are subject to the advisory fees in effect at the time the client entered into the advisory relationship. Therefore, the Firm's minimum advisory fees may differ among clients. Clients should note that similar advisory services may (or may not) be available from other registered (or unregistered) investment advisers for similar or lower fees.

Other Fees and Expenses
In addition to RISE's advisory fees, clients usually incur other fees and expenses in connection with our advisory services. Custodians, broker-dealers, and other financial institutions may impose brokerage and other transaction costs, asset-based charges, custodial fees, margin interest, and other administrative fees. Refer to the "Brokerage Practices" section (Item 12) of this Form ADV for additional information.

Mutual funds, ETFs, and other pooled investment vehicles typically pass management fees and other expenses through to their investors, so clients do incur these expenses to the extent that they invest in funds. Funds may also charge investors other types of fees such as transaction fees, early redemption fees and penalties, as well as 12b-1 fees.

Client assets may be allocated to other advisors or independent managers, who charge advisory fees, management fees, and other expenses to clients, in addition to RISE's advisory fees.

Refunds
RISE's investment management and hourly fees are paid in arrears. If an agreement is terminated before the end of a billing period, we will only bill for services provided up until the effective termination date.

However, flat fees are typically paid in advance. If an agreement is terminated before the end of a billing period, clients may request a refund based on the amount of time remaining in the billing period.

Compensation for The Sale of Securities
Neither RISE or its supervised persons accept any compensation for the sale of investment products, including asset-based sales charges or service fees from the sale of mutual funds.

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

Neither RISE Investment Management, LLC or any of our employees accept performance-based fees.

Item 7. Types of Clients

We primarily serve individuals, high net worth individuals, couples, families, trusts, businesses, retirement plans, and non-profit organizations. We do not have a stated minimum for investment management services, and there is no minimum fee for financial planning and consulting services.

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

Methods of Analysis
We review information from many sources to understand economic and market conditions, financial and tax issues, as well as information relating to specific investment managers, strategies, and vehicles. We evaluate information from multiple angles, including fundamental analysis, technical analysis, behavioral finance, statistical analysis, and other objective and subjective criteria.

Investment Strategies
RISE's investment recommendations are driven by individual client needs. We attempt to understand each client's unique financial situation in order to develop an appropriate strategic asset allocation. The strategic asset allocation provides allocation targets for the major asset classes, such as public equities and fixed-income, and when appropriate, private equity and debt, and real estate equity and debt. The strategic asset allocation may also include other alternative asset classes including commodities and digital asset securities.

We primarily use the following to gain exposure to various asset classes:

- Index-based strategies for publicly-traded equities
- Open-end mutual funds
- Exchange-traded funds (ETFs)
- Exchange-traded closed-end funds
- Closed-end interval funds
- Government securities
- Individual stock securities
- Limited partnerships
- Offshore corporations



- Pooled or collective investment vehicles and/or private placements

We do not typically engage in options strategies or insurance products such as annuities but may do so upon request and/or to meet specific client objectives.

We believe in investing for the long-term, but opportunities, risks, and tax considerations may call for short-term purchases or trading. Long-term purchases are investments held at least a year, short-term purchases are investments sold within a year, and trading refers to investments sold within 30 days.

Risk of Loss
All investing involves a risk of loss. Past performance is not indicative of future results. Current and prospective clients should never assume that the future performance of any specific investment or investment strategy will be profitable. Clients and prospective clients should be prepared to bear investment loss, including the loss of the original principal. It is important that you understand the inherent risks of investing and that we cannot imply, represent, or guarantee that our recommendations or strategies will not suffer losses.

Private Placements
We may recommend privately placed collective investment vehicles (some of which may be referred to as "hedge funds," "private equity," "private debt," "private real estate," "fund of funds," "digital assets", and other names) for certain accredited investor clients.

There are few limitations on the types of securities or other financial instruments which may be traded and no requirement to diversify. The funds may trade on margin, borrowed capital, or otherwise leverage positions, thereby potentially increasing the risk to the vehicle. In addition, because the vehicles are not registered as investment companies, there is an absence of regulation. There are substantial risks incidental to the ownership of such investments and any investment is speculative and involves a high degree of risk of loss by the client of their entire investment. Investments in such are typically only for investors who qualify as accredited investors or qualified purchasers, as those terms are defined in the Securities Act. Investors in such must be able to bear the economic risk of losing their entire investment and understand that such an investment cannot readily be sold and is not suitable for an investor unless the investor has available other personal liquid assets to assure that their investment will not cause any undue financial difficulties or affect the investor's ability to provide for current needs and possible personal financial contingencies. Clients should consult their attorney concerning such an investment and consult with independent tax counsel regarding the tax considerations of investing. No public market exists or is anticipated to exist for such investments. Therefore, each prospective investor must consider its investment to be illiquid. There are numerous other risks in investing in these securities. The client will receive a private placement memorandum and/or other documents explaining such risks.

Description of Material, Significant, or Unusual Risks

Market Risk
The prices of individual investments or the entire stock market, bond market, real estate market, and other markets have and can decline in value. Future declines may be greater than past declines.

Manager Risk
Whether investing in a passively-managed index strategy or actively-managed strategy, there is a possibility that the manager misrepresents itself, commits fraudulent acts, and/or will not perform as expected and a loss of value is possible.

Fund Risk
Open-end, closed-end, and exchange-traded fund objectives and holdings vary widely. Owning

investments with other shareholders exposes you to investment risks that you may not be otherwise exposed to, including but not limited to forced selling and/or taxable events. Funds also incur expenses, fees, and transaction costs which you may not incur if investments were held directly.

Illiquidity
If you want to sell an investment that you own, you may not be able to sell it. There may not be a secondary market or it may not function properly during times of market stress.

Investing involves the risk of loss and there are many more risks that listed above. Clients should be prepared to bear such loss.

Item 9. Disciplinary Information

We are required to disclose the material facts of any legal or disciplinary events that are material to a client's evaluation of our advisory business or the integrity of our management.

Criminal or Civil Actions
There are no criminal or civil actions to report.

Administrative Enforcement Proceedings
There are no administrative proceedings to report.

Self-Regulatory Organization Proceedings
There are no self-regulatory organization proceedings to report.

Item 10. Other Financial Industry Activities and Affiliations

Neither RISE or any of our management persons are registered, or have any applications pending to register, as a broker-dealer, registered representative of a broker-dealer, futures commission merchant, commodity pool operator, commodity trading advisor, or an associated person of the aforementioned entities.

Neither RISE or any of our management persons have material relationships with any the following companies or entities that are material to our advisory business:

- Broker-dealer, municipal securities dealer, or government securities dealer or broker;
- Investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund);
- Other investment adviser or financial planner;
- Futures commission merchant, commodity pool operator, or commodity trading advisor;
- Banking or thrift institution;
- Accountant or accounting firm;
- Lawyer or law firm;
- Insurance company or agency;
- Pension consultant;
- Real estate broker or dealer; or
- Sponsor or syndicator of limited partnerships.

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

Code of Ethics
We have adopted a Code of Ethics (the "Code"), which sets forth high ethical standards of business conduct for any related person of the Firm, including but not limited to our Principals, Officers and employees. The Code governs a number of potential conflicts of interest that we may encounter. The Code is based on the principle that we owe a fiduciary duty to our clients for which we serve as an adviser.

In adherence with the Code, RISE and its related persons must avoid activities, interests and relationships that might interfere or appear to interfere with making decisions in the best interests of their clients. The Code seeks to place the interests of RISE's clients over the interests of the Firm and any of its employees, and to comply with the applicable federal securities laws and other applicable laws. Each new RISE employee receives a copy of the Code when hired. Each employee is required to sign the Code acknowledging that they have read, understand, and will abide by the Code and its requirements. All employees receive training as necessary but no less than at least annually and are monitored for compliance with the Code. The Chief Compliance Officer of RISE sends copies of any amendments to the Code to all employees, partners and directors of the Firm, who must acknowledge in writing having received the Code and the amendments. Each access person must also annually attest to the adherence to the Code.

A copy of the Code is made available to any client or prospective client upon request by contacting us at clientservice@riseinvestmentsusa.com.

The Code includes, but is not limited to the following:

- Prohibition on the acceptance of gifts and entertainment that exceed policy standards
- Prohibition on insider trading and communication and handling of material non-public information
- Requirements related to the handling of confidential information
- Restrictions related to employee trading transactions
- Requirements for reporting applicable personal securities transactions
- Record retention requirements

Participation or Interest in Client Transactions and Personal Trading
As a fiduciary, it is an investment adviser's responsibility to provide fair and full disclosure of all material facts and to act solely in the best interest of each of our clients at all times. We have a fiduciary duty to all clients. We also believe that if investment goals are similar for clients and for the Firm's related persons, then it is logical that there be common ownership of certain securities. Therefore, in order to prevent conflicts of interest as a fiduciary to our clients, we have in place a set of procedures with respect to transactions effected by our Firm and its related persons for their personal accounts[1]. In order to monitor compliance with our personal trading policy, we require quarterly securities transaction reporting for all of our Firm's related persons.

RISE and its related persons may buy or sell for their personal accounts, securities identical to those recommended to the Firm's clients. This creates a conflict of interest in situations including but not limited to the following:

- The Firm's related person already owns the security prior to the client owning it; or

[1] For purposes of the policy, personal account generally includes any account (a) in the name of the Firm's related person (including but not limited to Principals, Officers and employees), his/her spouse, his/her minor children or other dependents residing in the same household, (b) for which the Firm's related person is a trustee or executor, or (c) an account controlled by the Firm's related person, including our client accounts which our related persons control and/or a member of his/her household has a direct or indirect beneficial interest in.



- The Firm's related person buys or sells the security at/or about the same time the recommendation is made to the client.

The conflict of interest arises since the client's purchase of the security could push the price of the security up, creating a profit for the Firm's related person. It is our expressed policy that it must be disclosed to the client if the security is already owned by a related person of the Firm. The disclosure must be provided at the time the investment recommendation is made to the client. In order to minimize this conflict of interest, our related persons will place client interests ahead of their own interests and adhere to our Firm's Code of Ethics, a copy of which is available upon request.

Item 12. Brokerage Practices

Selecting a Brokerage Firm
We seek to recommend a custodian/broker who will hold client assets and execute transactions on terms that are overall most advantageous when compared to other available providers and their services. We consider a wide range of factors, including, among others:

- Ability to maintain the confidentiality of trading intentions
- Timeliness of execution
- Timeliness and accuracy of trade confirmations
- Liquidity of the securities traded
- Willingness to commit capital
- Ability to place trades in difficult market environments
- Research services provided
- Ability to provide investment ideas
- Execution facilitation services provided
- Record keeping services provided
- Custody services provided
- Frequency and correction of trading errors
- Ability to access a variety of market venues
- Expertise as it relates to specific securities
- Financial condition
- Business reputation

With this in consideration, we have an arrangement with Schwab Institutional, a division of Charles Schwab & Co., Inc. ("Schwab"). Schwab provides services to RISE which include custody of securities, trade execution, clearance and settlement of transactions. RISE receives a benefit because it does not have to produce or pay for these services.

Schwab may charge brokerage commissions and transaction fees for effecting certain securities transactions. Schwab does not charge brokerage commissions or transaction fees for transactions of most individual securities, but they may charge brokerage commissions for certain no-load mutual funds, individual fixed-income securities, and derivative contracts such as equity stock options. The commission and transaction fees charged by Schwab for certain no-load mutual funds, individual fixed-income securities, and derivative contracts may be higher or lower than those charged by other custodians and broker-dealers.

Our clients may pay a commission to Schwab that is higher than another qualified broker dealer might charge to affect the same transaction where we determine in good faith that the commission is reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including the value of research provided, execution capability, commission rates, and responsiveness.

Accordingly, although we will seek competitive rates, to the benefit of all clients, we may not necessarily obtain the lowest possible commission rates for specific client account transactions.

Soft Dollars
We do not accept products or services that do not qualify for Safe Harbor outlined in Section 28(e) of the Securities Exchange Act of 1934, such as those services that do not aid in investment decision-making or trade execution.

Schwab may make certain research and brokerage services available at no additional cost to our Firm all of which qualify for the safe harbor exemption defined in Section 28(e) of the Securities Exchange Act of 1934. These services may be directly from independent research companies, as selected by our Firm (within specific parameters). Research products and services provided by may include research reports on recommendations or other information about, particular companies or industries; economic surveys, data and analyses; financial publications; portfolio evaluation services; financial database software and services; computerized news and pricing services; quotation equipment for use in running software used in investment decision-making; and other products or services that provide lawful and appropriate assistance by Schwab to our Firm in the performance of our investment decision-making responsibilities.

We do not use client brokerage commissions to obtain research or other products or services, beyond the aforementioned safe harbor exemptions of research and brokerage services which are used by our Firm to manage accounts for which we have investment discretion. Without this arrangement, our Firm might be compelled to purchase the same or similar services at our own expense. Thus, as a result of receiving these services, we may have an incentive to continue to use or expand the use of Schwab. Our Firm examined this potential conflict of interest when we chose to enter into the relationship with Schwab and we have determined that the relationship is in the best interest of our Firm's clients and satisfies our fiduciary obligations, including our duty to seek best execution.

Brokerage for Client Referrals
RISE and its related persons do not receive client referrals from broker-dealers or third-parties in exchange for using any broker-dealer or third-party services.

Directed Brokerage
We do not allow clients to direct brokerage.

Special Considerations for ERISA Clients
A retirement or ERISA plan client may direct all or part of portfolio transactions for its account through a specific broker or dealer in order to obtain goods or services on behalf of the plan. Such direction is permitted provided that the goods and services provided are reasonable expenses of the plan incurred in the ordinary course of its business for which it otherwise would be obligated and empowered to pay. ERISA prohibits directed brokerage arrangements when the goods or services purchased are not for the exclusive benefit of the plan. Consequently, we will request that plan sponsors who direct plan brokerage provide us with a letter documenting that this arrangement will be for the exclusive benefit of the plan.

Aggregation of Purchase or Sale
RISE performs investment management services for various clients. There are occasions on which portfolio transactions may be executed as part of concurrent authorizations to purchase or sell the same security for numerous accounts served by our Firm, which involve accounts with similar investment objectives. Although such concurrent authorizations potentially could be either advantageous or disadvantageous to any one or more particular accounts, they are effected only when we believe that to do so will be in the best interest of the effected accounts. When such concurrent authorizations occur, the objective is to allocate the executions in a manner which is deemed equitable to the accounts involved. In any given situation, we attempt to allocate trade executions in the most equitable manner possible, taking into consideration client objectives, current asset allocation and availability of funds using price averaging, proration and consistently non-arbitrary methods of allocation.

Item 13. Review of Accounts

Client accounts and financial plans are monitored on an ongoing basis by registered advisors of RISE. Reviews are conducted on at least a quarterly, as well in connection with reviews with clients or more often as market conditions dictate. We recommend semi-annual reviews with clients, either in person, by telephone, or by video conference. Clients may request more frequent reviews.

Clients typically receive account statements directly from the custodian on at least a quarterly basis. We typically supplement these custodial statements during client meetings or as requested.

Item 14. Client Referrals and Other Compensation

RISE receives an economic benefit from custodians in the form of the support products and services they make available to RISE and other independent investment advisors that have their clients maintain accounts with them. These products and services, how they benefit us, and the related conflicts of interest are described above *(see Item 12 –Brokerage Practices)*. The availability to us of our custodian's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

Referral Fees
We do not directly or indirectly compensate non-advisory personnel or third-party individuals for client referrals. We may compensate advisory personnel for new clients that they introduce to the Firm, but those clients' advisory fees are not increased as a result.

Events
We may host or co-host events that are fully or partially sponsored by third-parties. The third-parties may include investment sponsors, managers, custodians, vendors, or other parties that we have relationships with.

Item 15. Custody

As noted in Item 5, we have the ability to deduct advisory fees directly from client accounts. The Securities and Exchange Commission generally takes the position that any arrangement under which a registered investment adviser is authorized or permitted to withdraw client funds or securities maintained with a custodian upon the adviser's instruction to the custodian is deemed to have custody of client funds and securities.

The account custodians that we utilize for our clients send statements directly to the account owners on a monthly or quarterly basis. Clients should carefully review these statements and compare these statements to any account information provided by RISE.

Item 16. Investment Discretion

We accept and exercise discretionary authority to manage accounts on behalf of clients, pursuant to an executed advisory agreement. We take discretion over the following activities:

- The securities to be purchased or sold;
- The amount of securities to be purchased or sold;
- When transactions are made;
- The costs at which the transactions will be effected; and
- The independent managers to be hired or fired.

Limitations to the above may be imposed by clients in the form of specific constraints on any of these areas of discretion with RISE's written acknowledgement.

Item 17. Voting Client Securities

RISE does not vote or accept the authority to vote client securities. Clients receive proxies or other solicitations directly from their custodian or a transfer agent. Clients can contact RISE at clientservice@riseinvestmentsusa.com with any questions about client security voting or related solicitations.

Item 18. Financial Information

RISE is not required to disclose any balance sheet or financial information pursuant to this Item due to the following:

- The Firm does not require or solicit the prepayment of more than $500 in fees six months or more in advance of services rendered;
- The Firm does not have a financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients; and
- The Firm has not been the subject of a bankruptcy petition at any time during the past ten years.

Item 19. Requirements for State-Registered Advisers

Performance Based Fees
Neither RISE or any of our employees accept performance-based fees.

Arbitration Claims and Proceedings
Neither RISE or any of our management persons have been involved or found liable in an arbitration claim alleging damages in excess of $2,500 involving any of the following:

- An investment or an investment-related business or activity;
- Fraud, false statement(s), or omissions;
- Theft, embezzlement, or other wrongful taking of property;
- Bribery, forgery, counterfeiting, or extortion; or
- Dishonest, unfair, or unethical practices.

Neither RISE or any of our management persons have been involved in or found liable in civil, self-regulatory organization, or administrative proceedings involving any of the following:

- An investment or an investment-related business or activity;
- Fraud, false statement(s), or omissions;
- Theft, embezzlement, or other wrongful taking of property;
- Bribery, forgery, counterfeiting, or extortion; or
- Dishonest, unfair, or unethical practices.

Relationships and Arrangements with Issuers of Securities
Neither RISE or our management persons have any relationships or arrangements with any issuer of securities.

RISE Investment Management, LLC

Part 2B of Form ADV: *Brochure Supplement*

November 2026

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This brochure supplement provides information about Vincent DeCrow that supplements the RISE Investment Management, LLC Firm Brochure. You should have received a copy of that Firm Brochure. Please contact Vincent DeCrow if you did not receive RISE Investment Management, LLC's Firm Brochure or if you have any questions about the contents of this supplement.

Additional information about Vincent DeCrow is available on the SEC's website at www.adviserinfo.sec.gov or RISE Investment Management, LLC's website at www.riseinvestmentsusa.com.

Item 2. Educational Background and Business Experience

Name
Vincent DeCrow

Year of Birth
1991

Formal Education After High School

- Bryant University, Financial Planning Certificate, 2026

- The Ohio State University, Master of Science in Finance, 2015
  - Investment Management
  - Corporation Finance and Strategy
  - Mergers and Acquisitions
  - Real Estate

- Kent State University, Bachelor of Business Administration, 2013
  - Finance
  - Business Administration

Business Background

- RISE Investment Management, LLC ("RISE" or "RISE Investments")
  - Principal and Chief Compliance Officer
  - 2019 – Present

- Origin Investments Group, LLC ("Origin Investments")
  - Vice President, Investor Relations
  - 2017 – 2024

- Duff & Phelps, LLC
  - Senior Associate, Valuation Advisory
  - 2015 – 2017

Exams, Licenses & Other Professional Designations

Certified Financial Planner, CFP®

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 high standard of professional education, stringent code of conduct and standards of practice and ethical requirements that govern professional engagements with clients. To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- 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
- Attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university
- Pass the comprehensive CFP® Certification Examination
- Complete at least three years of full-time financial planning-related experience and agree to be bound by CFP® Board's Standards of Professional Conduct.

Individuals who become certified must 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 industry and 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.

Item 3. Disciplinary Information

Neither RISE Investment Management, LLC, or Vincent DeCrow have any material legal or disciplinary events to disclose.

Item 4. Other Business Activities

Vincent DeCrow does not have any outside business activities to report.

Item 5. Additional Compensation

Neither RISE Investment Management, LLC or Vincent DeCrow receive any economic benefit for providing advisory services other than those described in RISE Investment Management LLC's Form ADV Part 2A.

Item 6. Supervision

Neither RISE Investment Management, LLC, or Vincent DeCrow supervise any persons involved or related to advisory activities on behalf of the Firm.

Item 7. Requirements for State-Registered Advisors

Arbitration Claims and Proceedings
Neither RISE Investment Management, LLC or Vincent DeCrow have been involved or found liable in an arbitration claim alleging damages in excess of $2,500 involving any of the following:

- An investment or an investment-related business or activity;
- Fraud, false statement(s), or omissions;
- Theft, embezzlement, or other wrongful taking of property;
- Bribery, forgery, counterfeiting, or extortion; or
- Dishonest, unfair, or unethical practices.

Neither RISE Investment Management, LLC or Vincent DeCrow have been involved in or found liable in civil, self-regulatory organization, or administrative proceedings involving any of the following:



- An investment or an investment-related business or activity;
- Fraud, false statement(s), or omissions;
- Theft, embezzlement, or other wrongful taking of property;
- Bribery, forgery, counterfeiting, or extortion; or
- Dishonest, unfair, or unethical practices.

Bankruptcy Petitions
Neither RISE Investment Management, LLC or Vincent DeCrow have been the subject of any bankruptcy petitions.