



Item 1 – Cover Page

R.R. Gordon Advisors, LLC

Form ADV Part 2A – Brochure and Form ADV Part 2B – Brochure Supplement

1110 Brickell Ave Suite #403
Miami, FL 33131
(786) 265-9883

Established: July 19, 2016

This Brochure provides information about the business practices of R.R. Gordon Advisors, LLC and the qualifications of its advisors. It is available, free of charge, to all clients and prospective clients of the firm by contacting Ronald Gordon at (786) 265-9883 or by visiting our website at www.rrgordonadvisors.com.

The purpose of this brochure is to provide you with information about the firm that may help you make a decision on whether or not to retain our services.

R.R. Gordon Advisors, LLC. (“RRGA”, “We”, or “Us”) is a Registered Investment Advisor in the State of Florida. The information in this Brochure has not been approved or verified by the State of Florida or by the Securities and Exchange Commission or by any other State securities authority, and registration as an investment advisor does not imply any specified level of skill or training.



Item 2 – Material Changes

This brochure was last updated on June 29, 2018 to comply with requests for clarification made by the State of Florida.

The Form ADV Part 2A and 2B will be made available each year to all clients by Dec 31st, and will be offered to prospective clients prior to engagement of our services, along with our firm's Investment Advisory Agreement. We will further provide clients and prospective clients with a new brochure as necessary based on material changes to or new information about our firm.



Item 3 -Table of Contents for Form ADV Part 2A

(Form ADV Part 2, Brochure Supplement, starts on page 12)

Contents

Item 1 – Cover Page	1
Item 2 – Material Changes	2
Item 3 -Table of Contents for Form ADV Part 2A	3
Item 4 – Advisory Business	5
Item 5 – Fees and Compensation	6
Item 6 – Performance-Based Fees and Side-By-Side Management	7
Item 7 – Types of Clients	7
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss	7
Item 9 – Disciplinary Information	7
Item 10 – Other Financial Industry Activities and Affiliations	8
Item 11 – Code of Ethics	8
Item 12 – Brokerage Practices	8
Item 13 – Review of Accounts	9
Item 14 – Client Referrals and Other Compensation	10
Item 15 – Custody	10
Item 16 – Investment Discretion	10
Item 17 – Voting Client Securities	11
Item 18 – Financial Information	11
Item 19 – Requirements for State-Registered Advisers	11
Item 1 – Cover Page	13
Item 2 – Educational Background and Business Experience	11
Item 3 – Disciplinary Information	11
Item 4 – Other Business Activities	11
Item 5 – Additional Compensation	11
Item 6 – Supervision	12
Item 7 – Requirements for State-Registered Advisers	12



Item 1 — Cover Page	13
Item 2 — Educational Background and Business Experience	14
Item 3 — Disciplinary Information	14
Item 4 — Other Business Activities	14
Item 5 — Additional Compensation	14
Item 6 — Supervision	14
Item 7 — Requirements for State-Registered Advisers	14



Item 4 – Advisory Business

A. Advisory Firm

R.R. Gordon Advisors, LLC (RRGA) was founded in 2016 by Ronald Gordon, as a limited liability corporation under the name of R.R. Gordon Advisors, LLC.

B. Advisory Services

Investment Management

RRGA provides investment management services that include the development of an investment policy that is unique to each client, presentation and implementation of investment recommendations, and ongoing supervision and management of client investment assets. Other services include tax-related management and reporting, periodic rebalancing, semi-annual and annual reviews with clients, quarterly newsletter and periodic market commentary communications, and annual performance reporting. RRGA does not provide tax or legal services.

Financial Planning

In addition to investment management services, RRGA provides financial planning services to clients, which may include goal-based planning, cash-flow management, and *general* advice regarding mortgages, insurance, estate planning, tax planning, etc.. Financial planning services are typically offered to investment management clients at no additional charge. RRGA may also from time to time offer stand-alone planning services charged at an hourly rate.

C. Customized Portfolios

RRGA tailors individual client portfolios in the following ways:

- We review a client's personal risk tolerance and time horizon, and then allocate investments among stocks, bonds, options and cash in order to optimize the trade-off between risk and return for that particular client. **Allocations are not exclusively one product or inclusively all products.**
- We review a client's liquidity needs to make sure they have sufficient cash on hand to fund either regular or unexpected portfolio withdrawals.
- We gather information about each client's tax situation to make sure that we are achieving the best possible investment returns on an after-tax basis.
- We make accommodations for investments that a client may hold that is outside of our normal set of recommendations. We also make accommodations for those clients who wish to engage in Socially Responsible Investing by researching and using SRI-strategy mutual funds.

D. Wrap Fee Programs



RRGA does not participate in Wrap Fee programs.

E. Discretionary Management

RRGA manages client accounts on a discretionary basis, which means that clients do not approve transactions prior to their execution. As of this writing (August, 2019), approximately 100% of assets under management (\$ 300,000) is managed on a discretionary basis.

Item 5 – Fees and Compensation

A. Advisory fees are charged quarterly in advance. The fee is calculated by taking the quarter-end portfolio value, assigning the following rate schedule, and then dividing by four to arrive at a quarterly fee amount. The annual rates are:

<u>Assets Under Management</u>	<u>Fee</u>
\$0- 249,999	2.50%
\$250,000-499,999	2.00%
\$500,000-749,000	1.75%
\$750,000- \$1,000,000	1.50%
\$1,000,000 - \$3,000,000	1.00%
\$3,000,000 - \$5,000,000	0.75%
\$5,000,000 - \$10,000,000	0.35%
\$10,000,000 and above	0.25%

The minimum fee for new clients is \$5,000 per year. Fees are negotiable. Lower fees for comparable services may be available from other sources.

Advisory fees include the provision of financial planning services at no additional charge.

RRGA may from time to time, at its discretion, provide stand-alone financial planning services to individuals who do not retain our investment management services. These financial planning services will be charged a fee for service at an hourly rate of \$500.

B. Clients may elect to pay fees directly by cash or check, or authorize RRGGA to automatically debit fees from client accounts.

C. The fees listed above are in addition to any fees charged by the account custodian or costs associated with the implementation of the investment plan. These costs may include brokerage commissions, transaction fees, mutual fund operating expenses, custodial fees, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. RRGGA does not receive any portion of these commissions, fees or costs, and seeks to minimize them on clients' behalf whenever possible.

R.

Item 12 further describes the factors that RRGGA considers in selecting or recommending broker-dealers for client transactions and determining the reasonableness of their compensation (e.g., commissions).

D. Investment Advisory contracts may be terminated at any time for any reason with written notice at the will of the client or R.R. Gordon Advisors, LLC. RRGGA will refund any prepaid, unearned fees, and any earned but unpaid fees will be promptly due and payable.

E. Accounts initiated or terminated during a calendar quarter will be charged a pro-rated fee calculated based on a 30-day month, 360-day year calendar. Refunds will be paid by check and sent via U.S. mail within 30 days of receipt of termination notice.

F. RRGGA and its advisors do not receive compensation from the sale of securities or any compensation other than client fees as described above.

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

RRGGA does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

Item 7 – Types of Clients

RRGGA provides investment management and financial planning services to high net worth individuals, families, trusts, corporate pension and profit-sharing plans, and charitable institutions.

RRGGA does not have a mandatory minimum account size. Rather, we charge a minimum annual fee, which is currently \$5,000. This minimum fee may be negotiable for those clients with less than \$250,000 under management.

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

RRGGA follows no set method of school of investment strategy. Our strategy is a living, breathing organism that is not centered around one set strategy, but more so toward the strategy that yields the best performance and protection given the goals of each client.

Item 9 – Disciplinary Information



Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of RRGGA or the integrity of our management. RRGGA has received no legal or disciplinary action.

Item 10 – Other Financial Industry Activities and Affiliations

RRGA currently has no other Financial Industry Activities and Affiliations.

Item 11 – Code of Ethics

RRGA has adopted a Code of Ethics for the firm describing our high standard of business conduct and fiduciary duty to our clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at RRGGA must acknowledge the terms of the Code of Ethics annually, or as amended.

The owners and advisors of RRGGA follow the same investment strategy for their personal assets as is recommended to clients and, as a result, have ownership interest in many of the same mutual fund investments. Employee trading is continually monitored in order to reasonably prevent conflicts of interest between RRGGA and its clients.

RRGA clients or prospective clients may request a copy of the firm's Code of Ethics by contacting Ronald Gordon at (786) 265-9883.

Item 12 – Brokerage Practices

RRGA may require that clients establish brokerage accounts with the Interactive Brokers, a registered broker-dealer, member SIPC, to maintain custody of clients' assets and to effect trades for their accounts. RRGGA is independently owned and operated and not affiliated with Interactive Brokers. Interactive Brokers provides RRGGA with access to its institutional trading and custody services, which are typically not available to Interactive Brokers retail investors. These services generally are available to independent investment advisors on an unsolicited basis, at no charge. Interactive Brokers' services include brokerage, custody, research and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

For RRGGA's clients' accounts maintained in its custody, Interactive Brokers generally does not charge separately for custody but is compensated by account holders through commissions or other transaction-related fees for securities trades that are executed through Interactive Brokers or that settle into Interactive Brokers accounts.



Interactive Brokers also makes available to RRGGA other products and services that benefit RRGGA but may not benefit our clients' accounts. Some of these other products and services assist RRGGA in managing and administering clients' accounts. These include software and other technology that provide access to client account data (such as trade confirmations and account statements), provide research, pricing information and other market data, facilitate payment of RRGGA's fees from its clients' accounts and assist with back-office functions, record keeping and client reporting. Many of these services generally may be used to service all or a substantial number of RRGGA's accounts.

Interactive Brokers also makes available to RRGGA other services intended to help RRGGA manage and further develop its business enterprise. These services may include consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance and marketing. In addition, Interactive Brokers may make available, arrange and/or pay for these types of services rendered to RRGGA by independent third parties. Interactive Brokers may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third party providing these services to RRGGA. While as a fiduciary, RRGGA endeavors to act in its clients' best interests, our requirement that clients maintain their assets in accounts at Interactive Brokers may be based in part on the benefit to RRGGA of the availability of some of the foregoing products and services and not solely on the nature, cost or quality of custody and brokerage services provided by Interactive Brokers, which may create a potential conflict of interest.

RRGGA does not receive or utilize soft dollars, nor do we enter into any soft-dollar arrangements with broker-dealers. We do not receive compensation directly or indirectly from any source other than fees paid to us by our clients. Ronald Gordon does not receive commissions of any sort, nor does RRGGA receive a share of any fees collected by account custodians or mutual fund companies.

Item 13 – Review of Accounts

A. All client accounts are reviewed according to a set schedule, as follows:

Daily Review: our primary custodian, Interactive Brokers, provides RRGGA with a daily electronic data file containing all client account transactions and positions. Accounts are monitored and reconciled to the custodian on a daily basis.

Semi-Annual Review: All accounts are reviewed every six months in relation to their target portfolio weights, market movements, changes in fund recommendations, and shifts in target asset allocations.

Annual Review: In addition to the above, we seek to meet with clients at least once per year in order to stay informed regarding their personal situation and to determine whether the established Investment Policy remains appropriate. All portfolios are rebalanced at least once per year.

R.

Upon Client Request: In addition to the above, we periodically review client accounts in relation to new information presented by the client or in order to provide information requested by the client.

All reviews, whether initiated by Client or Advisor, are performed by Ronald Gordon/Principal.

B. Factors that may trigger a review in addition to those listed above include withdrawals from a client portfolio, additions to a client portfolio, changes to our tactical investment strategies, changes to our approved list of mutual funds, and extreme market conditions that would trigger a rebalancing of the portfolio prior to the next six-month review date.

C. All Investment Management clients receive monthly account position and transaction statements from the account custodian (primarily Interactive Brokers).

Item 14 – Client Referrals and Other Compensation

It is RRGGA's policy that the firm will not engage in any compensation arrangements for client referrals.

Item 15 – Custody

Clients receive monthly statements from the custodian that holds and maintains clients' investment assets (primarily, Interactive Brokers). Clients may elect to receive these statements electronically, which requires them to establish a user ID and password at www.interactivebrokers.com and to log on to Interactive Broker's website to review their accounts.

RRGA urges clients to review our billing statements sent each quarter with the amount of fees actually deducted from client accounts.

Item 16 – Investment Discretion

RRGA manages most client accounts on a discretionary basis, which means that the client does not approve transactions prior to their execution.

At the establishment of the advisory relationship, we collaborate with new clients on the preparation of a client-specific investment policy and then draft an Investment Policy Statement, which describes the client's personal financial situation, long-term return objectives, risk-tolerance, and any special constraints on the portfolio, such as significant tax exposure, a need for liquidity, or a desire for socially responsible screening. **We invest in financial instruments such as mutual funds, exchange-traded funds, individual bonds, stock options, etc. with client agreement and documented in the Investment Policy Statement prior to the execution of any transactions.**



As a result of the above policies, decisions made by us are typically limited to the specific securities to be bought or sold, and the amount and timing of those transactions.

Item 17 – Voting Client Securities

As a matter of firm policy and practice, RRGGA does not have any authority to and does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. RRGGA may provide advice to clients regarding the clients' voting of proxies.

Item 18 – Financial Information

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about our financial condition. RRGGA has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

RRGGA does not collect management fees, of any amount, six months or more in advance.

Item 19 – Requirements for State-Registered Advisers

Ronald Gordon, Principal

Education:

- Certified Financial Analyst level 1 candidate
- Bachelor of Arts Economics program, University of Florida A&M 2007-09
- Series 63, 65, 6, 26 Licensed

Relevant Business Background:

- Owner, R.R. Gordon Advisors.
- Owner, Ronald Gordon & Associates LLC
- Investment Advisor Representative, Primerica Advisors, LLC 2013-2016
- Regional Insurance Manager, Primerica Financial Services, LLC 2007-2016
- Broker, PFS Investments LLC 2012-2016

A. Ronald Gordon is not actively engaged in any business other than providing investment and financial planning advice.

B. Ronald Gordon does not receive performance-based fees or commissions.

C. Ronald Gordon has not been involved in any event related to wrongdoing or dishonest or unethical practices, nor been found liable in a civil, self-regulatory organization or administrative proceeding.

R.

D. Ronald Gordon does not have any relationships or arrangements with issuers of securities not listed in Item 10C.

F. All material conflicts of interest under CCR Section 260.238(k) are disclosed regarding RRGA and our representatives which could be reasonably expected to impair the rendering of unbiased and objective advice.



Item 1 – Cover Page

Form ADV Part 2B – Brochure Supplement

Ronald Gordon, R.R. Gordon Advisors, LLC

1110 Brickell Ave Suite #403
Miami, FL 33131
(772) 291-2137

Updated: August 28, 2019

This Brochure Supplement provides information about Ronald Gordon that supplements the R.R. Gordon Advisors, Inc. (RRGA) Brochure. Please contact Ronald Gordon at (786) 265-9883 if you did not receive RRGA's Brochure or if you have any questions about the contents of this supplement.

Additional information about Ronald Gordon is available on the SEC's website at www.adviserinfo.sec.gov.



Item 2 — Educational Background and Business Experience

Ronald Gordon, Principal

Education:

- Certified Financial Analyst level 1 candidate
- Bachelor of Arts Economics program, University of Florida A&M 2007-09
- Series 63,65,6,26 Licensed

Relevant Business Background:

- Owner, R.R. Gordon Advisors.
- Owner, Ronald Gordon & Associates LLC
- Investment Advisor Representative, Primerica Advisors, LLC 2013-2016
- Regional Insurance Manager, Primerica Financial Services, LLC 2007-2016
- Broker, PFS Investments LLC 2012-2016

A. Ronald Gordon is not actively engaged in any business other than providing investment and financial planning advice.

B. Ronald Gordon does not receive performance-based fees or commissions.

C. Ronald Gordon has not been involved in any event related to wrongdoing or dishonest or unethical practices, nor been found liable in a civil, self-regulatory organization or administrative proceeding.

D. Ronald Gordon does not have any relationships or arrangements with issuers of securities not listed in Item 10C.

Item 3 — Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this item.

Item 4 — Other Business Activities

Ronald is not engaged in any business activities other than the provision of investment management and financial planning services through R.R. Gordon Advisors, LLC

Item 5 — Additional Compensation



Ronald does not receive commissions, performance based fees or any other compensation other than fees paid directly by clients to R.R. Gordon Advisors, LLC.

Item 6 – Supervision

Ronald is a 100 % owner of R.R. Gordon Advisors, LLC. and is not supervised by any other employees.

Item 7 – Requirements for State-Registered Advisers

- A. Ronald has not been involved in any arbitration or judiciary proceedings.
- B. Ronald has not been the subject of a bankruptcy petition.



Item 1 – Cover Page

Form ADV Part 2B – Brochure Supplement

Dwayne Burns, R.R. Gordon Advisors, Inc.

1110 Brickell Ave Suite #403
Miami, FL 33179
(786) 778-0652

Updated: August 28, 2019

This Brochure Supplement provides information about Dwayne Burns that supplements the R.R. Gordon Advisors, Inc. (RRGA) Brochure. Please contact Ronald Gordon at (786) 778-0652 if you did not receive RRGA's Brochure or if you have any questions about the contents of this supplement.

Additional information about Dwayne Burns is available on the SEC's website at www.adviserinfo.sec.gov.



Item 2 — Educational Background and Business Experience

Dwayne Burns, Senior Advisor

Education:

- Bachelor of Science in Economics and Finance, Florida State University 2010-14
- Series 65 Licensed

Relevant Business Background:

- Financial Examiner/Analyst II, Florida Office of Financial Regulation
- Financial Examiner/Analyst I, Florida Office of Financial Regulation

Item 3 — Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this item.

Item 4 — Other Business Activities

- A. Dwayne is not engaged in any other investment-related business or occupation.
- B. Dwayne is actively engaged as an insurance agent with R.R. Gordon Financial. This occupation is non investment-related and involves the sale of non-variable insurance products. Time commitment is approximately 10 hours per week.

Item 5 — Additional Compensation

Dwayne does not receive commissions, performance based fees or any other compensation other than fees paid directly by clients to R.R. Gordon Advisors, LLC.

Item 6 — Supervision

Dwayne is supervised by the principal Ronald Gordon.

Item 7 — Requirements for State-Registered Advisers

- A. Dwayne has not been involved in any arbitration or judiciary proceedings.
- B. Dwayne has not been the subject of a bankruptcy petition.