

FORM ADV PART 3 – FORM CRS

R.H. BLUESTEIN & COMPANY

R.H. Bluestein & Company is registered with the Securities and Exchange Commission as an Investment Adviser.

The advisory services we provide and the fees we charge are different from those of a broker-dealer, and it is important for you to understand the differences. Free and simple tools are available to you to research firms and financial professionals at Investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers, and investing.

What investment services and advice can you provide me?

We offer investment advisory services. These include equity and fixed income asset management, financial planning, and family office services. These accounts are actively managed and continuously monitored by our investment professionals. Additionally, we may recommend that you invest in one or more private investment funds that we manage or that are managed by other firms.

In addition to investment advisory services, we may also advise clients on a variety of other financial issues, including college and retirement planning, mortgage financing, general liabilities management, insurance, charitable giving, estate planning, and wealth transfer. Currently, we also participate in a wrap-fee program sponsored by Wells Fargo Advisors. Our investment advisory services do not differ based on whether or not you are part of a wrap-fee program.

We review all portfolio investments frequently on behalf of each client account, and we send quarterly and annual written reports to each client. These reports contain a detailed listing of current investments, realized gains and losses, and income and expenses for each account.

We are generally granted discretionary authority by clients to determine the type, amount, and price of securities and investments to be bought and sold on behalf of each client account, including the selection of, and determination of commissions paid to, brokers. We also manage non-discretionary accounts where we provide clients with advice, reporting and other services, but the client makes all investment decisions. Non-discretionary clients should be aware that we may not be able to obtain the best transaction pricing and/or volume discounts.

The minimum amount required to open an account with us is \$2.5 million, but lesser amounts may be accepted at our discretion. The account must also be held with an independent custodian such as a bank or trust company.

Please see our Form ADV, Part 2 for more detailed information.

Conversation Starters:

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

What fees will I pay?

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

Our fees are ordinarily calculated as a percentage of the average capital under management in your account and are billed quarterly in arrears. The management fee is deducted directly from the assets of your account as the fee becomes payable. You can also request to be invoiced directly.

Our current fee schedule for new accounts is: 1.00% annually on the first \$5 million; 0.75% from \$5 million to \$15 million; 0.50% from \$15 million to \$25 million; 0.40% from \$25 million to \$45 million; 0.35% from \$45 million to \$65 million; 0.20% over \$65 million. Client accounts are generally subject to a minimum annual fee of \$25,000.

You are also responsible for the payment of any brokerage commissions and custodial fees. Brokerage commissions can range from \$0.00 to \$0.05 per share. Custodial fees are dependent on account size. Investments

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in mutual funds, ETFs, and closed-end funds are subject to the fees and expenses of those funds in addition to the fees you pay to us.

You can find more detail about our fees and costs in our Form ADV, Part 2.

Conversation Starters:

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

What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means.

On occasion, we (and our principals and employees) may buy and sell securities for ourselves that we also recommend to you. We and our principals and employees are also investors in some of the private investment funds that we manage.

From time to time, we may cause a client account to engage in a “cross trade” involving the purchase of an investment from or sale of an investment to another client account, provided that the sale or purchase is executed at the current market price of the investment being transferred and is in the best interests of both accounts.

In cases where we discuss estate planning, inter-generational gifting, or other related matters with a client, and other family members are also clients, a potential conflict (or the appearance thereof) may arise.

We may recommend that you invest in funds that we manage, which may create a conflict of interest.

Please see our Form ADV, Part 2 for more detailed information.

Conversation Starters:

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

How do your financial professionals make money?

Our financial professionals are compensated through salary and benefits. They are not compensated based on the amount of client assets they service, the time and complexity required to meet a client’s need, or commissions from purchase or sale of securities or other investment products.

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

No. Please visit Investor.gov/CRS for a free and simple search tool to research us and our financial professionals.

Conversation Starters:

As a financial professional, do you have any disciplinary history? For what type of conduct?

Additional Information

For additional information about our services, please see our Form ADV, Part 2. If you would like additional, up-to-date information or a copy of this disclosure, please call Jeffrey Bluestein, Senior Managing Director, at (248) 646-4000 or email to jbluestein@rhbc.com.

Conversation Starters:

Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?

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