



Form ADV Part 3 – Customer Relationship Summary
June 25, 2020

Is An Investment Advisory Account Right For You?

There are different ways you can get help with your investments. You should carefully consider which types of accounts and services are right for you.

The Randolph Company is an investment adviser registered with the Securities and Exchange Commission. We provide advisory accounts and services rather than brokerage accounts and services. Brokerage and investment advisory services and fees differ, and it is important for you to understand these differences. This document gives you a summary of the types of services we provide and how you pay. Please ask us for more information. There are suggested questions on page 2.

Relationships and Services.
<ul style="list-style-type: none">• We offer our services via a discretionary account that allows us to buy and sell investments in your account without asking you in advance. However, you may impose restrictions on investing in certain types of securities by written notice to us.• If you open a discretionary advisory account, you will pay an on-going asset-based fee at the end of each quarter for our services which is based on the value of the cash and investments in your advisory account.• We will discuss your investment goals, design with you a strategy to achieve your investment goals, and regularly monitor your account. We will contact you by phone or email and personally meet with you at least annually which may or may not be in person based on recommended health best practices at the time to discuss your portfolio.
Our Obligations to You. <i>We must abide by certain laws and regulations in our interactions with you.</i>
<ul style="list-style-type: none">• We are held to a fiduciary standard that covers our entire investment advisory relationship with you. For example, we are required to monitor your portfolio, investment strategy and investments on an ongoing basis.• Our interests can conflict with your interests. We must eliminate these conflicts or tell you about them in a way you can understand, so that you can decide whether or not to agree to them.• For additional information, please see The Randolph Company’s ADV Form 2, Item 4.
Fees and Costs. <i>Fees and costs affect the value of your account over time. Please ask your financial professional to give you personalized information on the fees and costs that you will pay.</i>
<ul style="list-style-type: none">• The amount paid to our firm generally does not vary based on the type of investments we select on your behalf. The asset-based fee reduces the value of your account and will be deducted from your account at the end of each quarter. We only charge an asset-based fee.• Some investments (such as mutual funds) impose additional fees that will reduce the value of your investment over time.• Accounts may incur brokerage expenses relating to trades. Small incidental fees (less than .002%) may be charged by the various exchange markets to cover the costs of supervising and regulating the markets.• We retain discretion to negotiate alternative investment management fees on a client to client basis.• The more assets you have in the advisory account, including cash, the more you will pay us. We, therefore, have incentive to increase your assets in your account in order to increase our fees. You pay our fee quarterly even if there are no buys or sells in the advisory account.

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<ul style="list-style-type: none"> 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. For additional information, please see The Randolph Company’s ADV Form 2, Item 5.
<p>Conflicts of Interest. We benefit from the advisory services we provide to you.</p>
<ul style="list-style-type: none"> When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts, because they can affect the investment advice we provide you. Here are some examples to help you understand what this means: We do not participate in any material relationships or arrangements with individuals or entities; or receive incentives from the broker-dealer directly related to client transactions; or compensate any person or entity, directly or indirectly, for client referrals. If we did, that would be a conflict of interest. For additional information, please see The Randolph Company’s ADV Form 2, Item 10.
<p>Information about our Financial Professionals.</p>
<p>How do your financial professionals make money?</p> <ul style="list-style-type: none"> Our financial professionals are compensated with an annual salary and have the potential of an annual bonus which is determined by RCO’s management. Do you or your financial professionals have legal or disciplinary history? No, none of The Randolph Company’s financial professionals have legal or disciplinary disclosures. Visit Investor.gov/CRS for a free and simple search tool to research us and our financial professionals.
<p>Additional Information. <i>We encourage you to seek additional information.</i></p>
<ul style="list-style-type: none"> For additional information on our advisory services and financial professionals, see our Form ADV Part 2A Brochure on IAPD on Investor.gov or on our website, therandolphcompany.com. To report a problem to the SEC, visit Investor.gov or call the SEC’s toll-free investor assistance line at (800) 732-0330. If you have a problem with your investments, investment account or a financial professional, contact us in writing at 4200 Malsbary Road, Cincinnati, OH 45242.
<p>Key Questions to Ask. <i>Ask our financial professionals these key questions about our investment services and accounts.</i></p>
<ol style="list-style-type: none"> Given my financial situation, why should I choose an advisory account? Do the math for me. How much would I pay per year for an advisory account? What would make those fees more or less? What services will I receive for those fees? What additional costs should I expect in connection with my account? Tell me how you and your firm make money in connection with my account. Do you or your firm receive any payments from anyone besides me in connection with my investments? What are the most common conflicts of interest in your advisory accounts? Explain how you will address those conflicts when providing services to my account. How will you choose investments to recommend for my account? How often will you monitor my account’s performance and offer investment advice? Do you or your firm have a disciplinary history? For what type of conduct? What is your relevant experience, including your licenses, education and other qualifications? Please explain what the abbreviations in your licenses are and what they mean. Who is the primary contact person for my account? What can you tell me about his or her legal obligations to me? If I have concerns about how this person is treating me, who can I talk to?