

Item 1 – Cover Page

Rockridge Money Management, LLC

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Ph: 510-595-7932

Date of Brochure: March 2012

This brochure provides information about the qualifications and business practices of Rockridge Money Management. If you have any questions about the contents of this brochure, please contact Gillette Edmunds at 510-595-7932 or at gillettee@aol.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 Rockridge Money Management is also available on the Internet at www.adviserinfo.sec.gov. You can view our firm's information on this website by searching for Rockridge Money Management. You may search for information by using the firm's CRD number. The CRD number for Rockridge Money Management is **154778**.

*Registration as an investment advisor does not imply a certain level of skill or training.

Item 2 – Material Changes

As required by the Dodd–Frank Wall Street Reform and Consumer Protection Act midsize investment advisory firms (firms with Assets Under Management between \$25 Million and \$99 Million) must change their primary regulatory authority from the United States Securities and Exchange Commission to the individual states in which they do business. Due to this regulatory change Rockridge Money Management is now filing for registration with the California Department of Corporations. Since our last annual update was filed in March 2011, the material changes to this disclosure brochure are the following:

- a) An update to the amount of client assets our firm manages. As of our last annual update in March 2011, Rockridge Money Management reported assets under management in the amount of \$32,200,000. In March 2012, we updated Item 4 – Advisory Business to report that as of the fiscal year-end December 31, 2011, the amount of client assets under management is \$17,588,222.
- b) Updates were made in March 2012 related to the firm's change from SEC to state registration. Item 4 now reflects that Rockridge Money Management is registered with the California Department of Corporations, not the U.S. Securities and Exchange Commission. In addition, Item 19, which requires disclosures that are unique to state registered investment advisers has been added to this disclosure brochure.

We will ensure that you receive a summary of any material changes to this and subsequent Disclosure Brochures within 120 days after our fiscal year ends. Our fiscal year ends on December 31 so you will receive the summary of material changes no later than April 30 each year. At that time we will also offer or provide a copy of the most current Disclosure Brochure. We may also provide other ongoing disclosure information about material changes as necessary.

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Item 4 – Advisory Business

Rockridge Money Management is an investment advisor registered with the State of California and is a Limited Liability Company formed under the laws of the State of California.

- Gillette Edmunds is the Managing Member and Chief Compliance Officer for Rockridge Money Management.
- Rockridge Money Management has been registered as an investment advisor since September 2010.

General Description of Primary Advisory Services

The investment advisory service that Rockridge Money Management provides is Asset Management Services, which are generally described in this Item 4. A more detailed description of our Asset Management Services is provided in *Item 5 – Fees and Compensation* so that you can review our description of services and description of fees in a side-by-side manner.

Asset Management Services - Rockridge Money Management provides advisory services in the form of Asset Management Services. Asset Management Services involve providing clients with continuous and on-going supervision over client accounts. This means that Rockridge Money Management will continuously monitor a client's account and make trades in client accounts when necessary.

Specialization

The firm specializes in providing individualized investment advice through its Asset Management Services.

Limits Advice to Certain Types of Investments

Rockridge Money Management provides investment advice on the following types of investments:

- No-Load (i.e. no trading fee) and Load-Waived (i.e. trading fee waived) Mutual Fund Shares
- Exchange-listed securities (i.e. stocks)
- Securities traded over-the-counter (i.e. stocks)
- Fixed income securities (i.e. bonds)
- Closed-End Funds and Exchange Traded Funds (ETFs)
- Foreign Issues
- Corporate debt securities (other than commercial paper)
- Municipal securities
- United States government securities

Rockridge Money Management does not provide advice on warrants, commercial paper, certificates of deposit, variable life insurance, variable annuities, options contracts on securities or commodities, futures contracts on tangibles or intangibles, interests in partnerships investing in real estate or oil and gas interests, and hedge funds and other types of private (i.e. non-registered) securities.

When providing Asset Management Services, we will typically construct each client's account holdings using mutual funds and equities to build diversified portfolios. We may modify our investment strategy to accommodate

special situations such as low basis stock, stock options, legacy holdings, inheritances, closely held businesses, collectibles, or special tax situations.

(Please refer to Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss for more information.)

Tailor Advisory Services to Individual Needs of Clients

Rockridge Money Management's services are always provided based on the individual needs of each client. This means, for example, that you are given the ability to impose restrictions on the accounts we manage for you, including specific investment selections and sectors. We work with each client on a one-on-one basis through interviews to determine the client's investment objectives and suitability information.

Client Assets Managed by Rockridge Money Management

The amount of clients assets managed by Rockridge Money Management totaled \$17,588,222 as of December 31, 2011. All of these assets are managed on a discretionary basis.

Item 5 – Fees and Compensation

In addition to the general information provided in *Item 4 – Advisory Business*, this section provides additional details regarding our investment advisory services along with descriptions of each service's fees and compensation arrangements.

Asset Management Services and Fees

Rockridge Money Management provides investment supervisory services defined as giving continuous investment advice and making investments for a client based on the individual needs of the client. Through this service, Rockridge Money Management offers a customized and individualized investment program for clients. Management services are provided on a discretionary basis only. Clients must give us written authorization to make all decisions to buy, sell or hold securities, cash or other investments in the managed account in our sole discretion without consulting with clients prior to transactions being made. Clients may place reasonable restrictions and guidelines on portfolio holdings.

Rockridge Money Management provides asset management services through accounts maintained for clients at a qualified custodian designated by the client. At no time will Rockridge Money Management have direct access to client funds and securities. The client's qualified custodian will maintain custody of all funds and securities.

Clients are charged for Rockridge Money Management's asset management services based on a percentage of assets under management. Charges for asset management services will generally be according to the fee schedule below:

<u>Value of Assets Under Management</u>	<u>Annual Fee</u>
\$0 - \$1,000,000.00	1.0%
\$1,000,000.01 - \$3,000,000.00	0.75%
\$3,000,000.01 - \$6,000,000.00	0.60%
>\$6,000,000.00	0.50%

The actual fee charged to each client is negotiable based on factors such as the client's financial situation and circumstances, and the overall complexity of the services provided. The exact services and fees will be agreed upon and disclosed in the agreement for services prior to services being provided.

Fees for Rockridge Money Management's services are billed quarterly in arrears based on the value of the account at the end of the quarter. The quarterly fee will be pro-rated for assets deposited to the account during the quarter. Rockridge Money Management will send the client a fee statement at the end of each quarter or we will send a fee statement to the custodian at the end of each quarter if requested by the client. Clients must provide the custodian with written authorization to have fees deducted from the account and paid to Rockridge Money Management. The custodian will send client statements, at least quarterly, showing all disbursements for the client's account including the amount of the advisory fee deducted directly from the account. Rockridge Money Management provides monthly performance reports to all advisory clients. Clients are strongly urged to compare all reports received from Rockridge Money Management against their brokerage account statements received from the custodian. Discrepancies between reports received from Rockridge Money Management and the statements received from the custodian should be immediately reported to Rockridge Money Management and/or the custodian.

Brokerage commissions and/or transaction ticket fees charged by the custodian will be billed directly to the client. Rockridge Money Management will not receive any portion of such commissions or fees from the custodian or client. In addition, clients may incur certain charges imposed by third parties other than Rockridge Money Management in connection with investments made through the account, including but not limited to: mutual fund sales loads, 12(b)-1 fees and surrender charges and IRA and qualified retirement plan fees. Management fees charged by Rockridge Money Management are separate and distinct from the fees and expenses charged by investment company securities that may be recommended to clients. A description of the investment company fees and expenses are available in each investment company security's prospectus.

Either party may terminate the agreement for services at any time. If services are terminated within five (5) business days of executing the agreement, services will be terminated without penalty and no fees shall be due. If services are terminated after the initial five day period, any fees due will be pro-rated and billed to client. In the event a client terminates services, termination shall be effective from the time Rockridge Money Management receives written notification or such other time as may be mutually agreed upon, subject to the settlement of transactions in progress and the final payment of advisory fees. There will be no penalty charge upon termination. In the event we terminate the relationship, the agreement will be terminated upon notice to you of the termination with any verbal notice confirmed by a written termination notice or at such time as may be mutually agreed upon, also subject to the settlement of transactions in progress and the final payment of advisory fees. You may not assign the agreement for services without our prior written consent; nor shall we make any assignment without prior notice and consent from you.

Class Action Lawsuits: You retain the right under the applicable securities laws to initiate individually a lawsuit or join a class-action lawsuit against the issuer of a security that was held, purchased or sold by or for you. Rockridge Money Management will not initiate such a legal proceeding on your behalf and does not provide legal advice to clients regarding potential causes of action against such a security issuer and whether any client should join a class-action lawsuit. Rockridge Money Management recommends that you seek legal counsel prior to making a decision regarding whether to participate in such a class-action lawsuit. Moreover, our services do not include monitoring or informing you of any potential or actual class-action lawsuits against the issuers of the securities that were held, purchased or sold by or for you.

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

This Item 6 is not applicable to our Disclosure Brochure because Rockridge Money Management **does not charge or accept performance-based fees**, which can be defined as fees based on a share of capital gains on or capital appreciation of the assets held within a client's account.

Item 7 – Types of Clients

Rockridge Money Management generally provides investment advice to the following types of clients:

- Individuals
- High-Net Worth Individuals
- Trusts, estates, or charitable organizations

All clients are required to execute an agreement for services in order to establish a client arrangement with Rockridge Money Management.

Minimum Investment Amounts Required

Generally, Rockridge Money Management will require a minimum account value of \$500,000 for new accounts. At our discretion, we may waive this account minimum.

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

Method of Analysis

Rockridge Money Management uses the following method of analysis in formulating investment advice:

Fundamental - A method of evaluating a security by attempting to measure its intrinsic value by examining related economic, financial and other qualitative and quantitative factors. Fundamental analysts attempt to study everything that can affect the security's value, including macroeconomic factors (like the overall economy and industry conditions) and individually specific factors (like the financial condition and management of companies). The end goal of performing fundamental analysis is to produce a value that an investor can compare with the security's current price in hopes of figuring out what sort of position to take with that security (underpriced = buy, overpriced = sell or short). This method of security analysis is considered to be the opposite of technical analysis. Fundamental analysis is about using real data to evaluate a security's value. Although most analysts use fundamental analysis to value stocks, this method of valuation can be used for most types of securities.

Investment Strategies

Rockridge Money Management uses the following investment strategies when managing client assets and/or providing investment advice:

Long term purchases. Investments held at least a year.

Short term purchases. Investments sold within a year.

Trading. Investments sold within 30 days.

Use of Primary Method of Analysis or Strategy

Rockridge Money Management's primary method of analysis or strategy is fundamental analysis. Some of the risks involved with using this method include market breaks during which all stocks plunge regardless of fundamental values.

Rockridge Money Management's secondary strategy involves frequent trading of securities. The frequent trading of securities may have a positive or negative impact on investment performance. Performance from active trading can be lowered due to an increase in brokerage and other transaction costs.

Primarily Recommend One Type of Security

Rockridge Money Management primarily recommends dividend paying stocks. Some of the risks involved with this type of security include a loss of principal value when dividends are cut or eliminated.

Risk of Loss

Past performance is not indicative of future results. Therefore, you should never assume that future performance of any specific investment or investment strategy will be profitable. Investing in securities (including stocks, mutual funds, and bonds) involves risk of loss. Further, depending on the different types of investments there may be varying degrees of risk. You should be prepared to bear investment loss including loss of original principal.

Because of the inherent risk of loss associated with investing, we are unable to represent, guarantee, or even imply that our services and methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to market corrections or declines. There are certain additional risks associated when investing in securities through our asset management services program.

- Market Risk – Either the stock market as a whole, or the value of an individual company, goes down resulting in a decrease in the value of client investments. This is also referred to as systemic risk.
- Equity (stock) market risk – Common stocks are susceptible to general stock market fluctuations and to volatile increases and decreases in value as market confidence in and perceptions of their issuers change. If you held common stock, or common stock equivalents, of any given issuer, you would generally be exposed to greater risk than if you held preferred stocks and debt obligations of the issuer.
- Company Risk. When investing in stock positions, there is always a certain level of company or industry specific risk that is inherent in each investment. This is also referred to as unsystematic risk and can be reduced through appropriate diversification. There is the risk that the company will perform poorly or have its value reduced based on factors specific to the company or its industry. For example, if a company's employees go on strike or the company receives unfavorable media attention for its actions, the value of the company may be reduced.

- Fixed Income Risk. When investing in bonds, there is the risk that issuer will default on the bond and be unable to make payments. Further, individuals who depend on set amounts of periodically paid income face the risk that inflation will erode their spending power. Fixed-income investors receive set, regular payments that face the same inflation risk.
- Options Risk. Options on securities may be subject to greater fluctuations in value than an investment in the underlying securities. Purchasing and writing put and call options are highly specialized activities and entail greater than ordinary investment risks.
- ETF and Mutual Fund Risk – When you invest in an ETF or mutual fund, you will bear additional expenses based on your pro rata share of the ETF's or mutual fund's operating expenses, including the potential duplication of management fees. The risk of owning an ETF or mutual fund generally reflects the risks of owning the underlying securities the ETF or mutual fund holds. You will also incur brokerage costs when purchasing ETFs.
- Management Risk – Your investment with our firm varies with the success and failure of our investment strategies, research, analysis and determination of portfolio securities. If our investment strategies do not produce the expected returns, the value of the investment will decrease.

Item 9 – Disciplinary Information

Item 9 is not applicable to our Disclosure Brochure because there are no legal or disciplinary events that are material to a client's or prospective client's evaluation of our business or integrity.

Item 10 – Other Financial Industry Activities and Affiliations

Rockridge Money Management is **not** and does **not** have a related company that is a (1) broker/dealer, municipal securities dealer, government securities dealer or broker, (2) 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), (3) other investment adviser or financial planner, (4) futures commission merchant, commodity pool operator, or commodity trading advisor, (5) banking or thrift institution, (6) accountant or accounting firm, (7) lawyer or law firm, (8) insurance company or agency, (9) pension consultant, (10) real estate broker or dealer, or (11) sponsor or syndicator of limited partnerships.

Outside Business Activities and Affiliations

Gillette Edmunds is the author of three investment books, the co-author of one investment book and the author of one novel. He is currently working on a nonfiction manuscript.

Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading

Code of Ethics Summary

All investment advisers are required to establish, maintain and enforce a Code of Ethics. Rockridge Money Management has established a Code of Ethics that applies to all of its associated persons. 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. Rockridge Money Management acknowledges that it has a fiduciary duty to all clients. This fiduciary duty is considered the core underlying principle for our Code of Ethics,

which also covers our Insider Trading and Personal Securities Transactions Policies and Procedures. We require all of our supervised persons to conduct business with the highest level of ethical standards and to comply with all federal and state securities laws at all times. Upon employment or affiliation and when changes occur, all supervised persons will sign an acknowledgement that they have read, understand and agree to comply with our Code of Ethics. Rockridge Money Management has the responsibility to make sure that the interests of all clients are placed ahead of the firm's or its supervised person's own investment interest. Full disclosure of all material facts and potential conflicts of interest will be provided to clients prior to any services being conducted. Rockridge Money Management and its supervised persons must conduct business in an honest, ethical and fair manner and avoid all circumstances that might negatively affect or appear to affect our duty of complete loyalty to all clients. This disclosure is provided to give all clients a summary of our Code of Ethics. However, if you wish to review our Code of Ethics in its entirety, a copy will be provided promptly upon receipt of your request.

Affiliate and Employee Personal Securities Transactions Disclosure

Rockridge Money Management or its associated persons may buy or sell for their personal accounts, investment products identical to those recommended to clients. This creates a potential conflict of interest. It is the express policy of Rockridge Money Management that all persons associated in any manner with our firm must place the interests of our clients ahead of their own when implementing personal investments. Rockridge Money Management and its associated persons shall not buy or sell securities for their personal account(s) where their decision is derived, in whole or in part, by information obtained as a result of his/her employment unless the information is also available to the investing public upon reasonable inquiry. In order to minimize this conflict of interest, securities recommended by Rockridge Money Management are widely held and publicly traded.

Item 12 – Brokerage Practices

Clients wishing to implement the advice of Rockridge Money Management are free to select any broker/dealer or investment advisor they wish and are so informed. Broker-dealers serving as custodians to clients of Rockridge Money Management may make available at reduced or no cost to our firm other products and services that benefit our firm but may not benefit the clients' accounts. Some of these other products and services assist us 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); facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts); provide research, pricing information and other market data; facilitate payment of fees to our firm from clients' accounts; and assists with back-office functions, record-keeping and client reporting. Such broker-dealers serving as a custodian to Rockridge Money Management's clients may also offer other services intended to help us manage and further develop our business enterprise such as consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, and marketing.

Handling Trade Errors

Rockridge Money Management has implemented procedures designed to prevent trade errors; however, trade errors in client accounts cannot always be avoided. Consistent with its fiduciary duty, it is the policy of Rockridge Money Management to correct trade errors in a manner that is in the best interest of the client. Rockridge Money Management will never benefit or profit from trade errors.

Block Trading Policy

Rockridge Money Management does not trade accounts on a block basis (each client has unique trades and Rockridge Money Management does not "allocate" shares to a group of clients by aggregating accounts in one trade. As previously noted, clients of Rockridge Money Management select the broker-dealer or custodian for their account(s) and Rockridge Money Management does not recommend any particular broker-dealer or custodian to clients. It should be noted that implementing trades on a block or aggregate basis can be less expensive for client accounts; however, it is the policy of Rockridge Money Management to always trade on an individual account basis. One potential benefit of block trading is to achieve the same or more consistent execution price of the same security across multiple accounts. Rockridge Money Management is not currently aware of any material savings that would be obtained by block trading for clients. Based on the low number of accounts managed by Rockridge Money Management and the fact that Rockridge Money Management is able to trade client accounts at or around the same time (when holding the same security), the firm has determined that the minor variances in execution prices achieved are not significant enough to justify block trading.

Item 13 – Review of Accounts

Account Reviews and Reviewers

All account reviews are conducted by Gillette Edmunds. Accounts are reviewed at least once a month, but generally are reviewed several times a week. The review checks for performance, asset allocation, additions and withdrawals, dividend and interest payments and other changes in the account.

Statements and Reports

Clients will receive statements at least quarterly from the custodian at which their accounts are maintained. In addition, clients will receive monthly performance reports from Rockridge Money Management.

Item 14 – Client Referrals and Other Compensation

Rockridge Money Management does not directly or indirectly compensate any person for client referrals.

The only form of other compensation received from advisory services is the fees charged for providing investment advisory services as described in Item 5 of this brochure. Rockridge Money Management receives no other forms of compensation in connection with providing investment advice.

Item 15 – Custody

Custody, as it applies to investment advisors, has been defined by regulators as having access or control over client funds and/or securities. In other words, custody is not limited to physically holding client funds and securities. If an investment advisor has the ability to access or control client funds or securities, the investment advisor is deemed to have custody and must ensure proper procedures are implemented.

Rockridge Money Management is deemed to have custody of client funds and securities whenever Rockridge Money Management is given the authority to have fees deducted directly from client accounts. However, this is the only form of custody Rockridge Money Management will ever maintain. It should be noted that authorization to trade in client accounts is not deemed by regulators to be custody.

For accounts in which Rockridge Money Management is deemed to have custody, our firm has established procedures to ensure all client funds and securities are held at a qualified custodian in a separate account for each client under that client's name. Clients or an independent representative of the client will direct, in writing, the establishment of all accounts and therefore are aware of the qualified custodian's name, address and the manner in which the funds or securities are maintained. Finally, account statements are delivered directly from the qualified custodian to each client, or the client's independent representative, at least quarterly. Clients should carefully review those statements and are urged to compare the statements against reports received from Rockridge Money Management. When clients have questions about their account statements, they should contact Rockridge Money Management or the qualified custodian preparing the statement.

When fees are deducted from an account, Rockridge Money Management is responsible for calculating the fee and delivering instructions to the custodian. At or prior to the time Rockridge Money Management instructs the custodian to deduct fees from your account, Rockridge Money Management will send you an invoice itemizing the fee. Itemization will include the formula used to calculate the fee, the amount of assets under management the fee is based on, and the time period covered by the fee.

Item 16 – Investment Discretion

Through its asset management services and upon receiving written authorization from a client, Rockridge Money Management will maintain trading authorization over client accounts. Upon receiving written authorization from the client, Rockridge Money Management may implement trades on a **discretionary** basis. When discretionary authority is granted, Rockridge Money Management will have the authority to determine the type of securities and the amount of securities that can be bought or sold for the client's portfolio without obtaining the client's consent for each transaction.

All clients have the ability to place reasonable restrictions on the types of investments that may be purchased in an account. Clients may also place reasonable limitations on the discretionary power granted to our firm so long as the limitations are specifically set forth or included as an attachment to the client agreement.

Item 17 – Voting Client Securities

Rockridge Money Management will not vote proxies on behalf of your account. While there are some investment advisors that will vote proxies and other corporate decisions on behalf of their clients, we have determined that taking on the responsibility for voting client securities does not add enough value to the services provided to clients to justify the additional compliance and regulatory costs associated with voting client securities. You will receive proxies directly from your custodian or transfer agent and such documents will not be delivered by our firm. It is your responsibility to vote all proxies for securities held in accounts managed by our firm.

Item 18 – Financial Information

This Item 18 is not applicable to our Disclosure Brochure. Rockridge Money Management does not require or solicit prepayment of more than \$1200 in fees per client, six months or more in advance. Therefore, we are not required to include a balance sheet for our most recent fiscal year. We are not subject to a financial condition that is reasonably likely to impair our ability to meet contractual commitments to clients. Finally, Rockridge Money Management has not been the subject of a bankruptcy petition at any time *(Please refer to the Information Required by Part 2B of Form ADV: Brochure Supplement following this Part A Disclosure Brochure for more information)*.

Item 19 – Requirements for State-Registered Advisers

Executive Officer and Management Personnel

Gillette Edmunds

Educational Background:

Bachelor of Arts - Stanford University
Juris Doctor – University of New Mexico
LLM in Taxation – New York University

Business Experience (Five Years):

For the five years from 2005 – 2010, Mr. Edmunds was a self-employed family money manager. Additionally, during this time period, Mr. Edmunds has been self-employed as a writer. He has written books and articles related to investing as well as written fiction.

Other Business Activities

See Item 10 – Other Financial Industry Activities and Affiliations.

No Performance Based Fees

As previously disclosed in Item 6, Rockridge Money Management does not charge or accept performance-based fees.

No Arbitrations

Rockridge Money Management or any of its associated persons have not been the subject of any client arbitrations or similar legal disputes.

Item 20 – Privacy Policy

Commitment to Your Private Information: Rockridge Money Management has a policy of protecting the confidentiality and security of information we collect about our clients. Rockridge Money Management does not, and will not, share nonpublic personal information about clients (“Information”) with outside third parties without client’s consent, except for the specific purposes described below. This notice has been provided to clients to describe the Information we may gather and the situations under which we may need to share it.

Why We Collect and How We Use Information. Rockridge Money Management limits the collection and use of Information within our firm to only those individuals associated or employed with us that must have Information to provide financial services to clients. Such services include maintaining client accounts, processing transaction requests, providing financial planning, financial consultation, and other services described in our Form ADV.

How We Gather Information. Rockridge Money Management gets most Information directly from you, the client, when you provide us with information from any of the following sources:

- Applications or forms (for example: name, address, social security number, birth date, assets, income, financial history)

- Transactional activity in your account (for example: trading history and account balances)
- Information services and consumer reporting sources (for example: to verify your identity or to assess your credit history)
- Other sources with your consent (for example: your insurance professional, attorney, or accountant)

How We Protect Information. Our employees and affiliated persons are required to protect the confidentiality of Information and to comply with our stated policies. They may access Information only when there is an acceptable reason to do so, such as to service your account or provide you with financial services. Employees who violate our Privacy Policy are subject to disciplinary action, up to and including termination from employment with us. We also maintain physical, electronic, and procedural safeguards to protect information, which comply with applicable SEC, state, and federal laws.

Sharing Information with Other Companies Permitted Under Law. We do not disclose Information obtained in the course of our practice except as required or permitted under law. Permitted disclosures include, for instance, providing information to unrelated third parties who need to know such Information in order to assist us with providing services to you. Unrelated third parties may include broker/dealers, mutual fund companies, insurance companies, and the custodian with which your assets are held. In such situations, we stress the confidential nature of information being shared.

Former Customers. Even if we cease to provide you with financial products or services, our Privacy Policy will continue to apply to you and we will continue to treat your nonpublic information with strict confidentiality.

Information Required by Part 2B of Form ADV: *Brochure Supplement*

Gillette Edmunds

The following are responses to each item found in the Form ADV Part 2B instructions.

Item 1 – Cover Page

All cover page information required in the Form ADV Part 2B instructions can be found on the cover page of this Disclosure Brochure.

Item 2 – Educational Background and Business Experience

Gillette Edmunds

Year of Birth: 1951

Educational Background:

Bachelor of Arts - Stanford University

Juris Doctor – University of New Mexico

LLM in Taxation – New York University

Business Experience (Five Years):

For the previous five years (2005 – 2010), Mr. Edmunds has been a self-employed family money manager.

Additionally, during this time period, Mr. Edmunds has been self-employed as a writer. He has written books and articles related to investing as well as written fiction.

Item 3 – Disciplinary Information

As previously stated in Item 9 of this Disclosure Brochure, I have never been subject to a legal or disciplinary event.

Item 4 – Other Business Activities

Please see Item 10 of this Disclosure Brochure for details regarding my other business activities.

Item 5 – Additional Compensation

Other than the fees detailed in Item 5 of this Disclosure Brochure, I receive no other compensation related to advisory services provided to clients.

Item 6 – Supervision

I am the sole affiliate of my investment advisor firm and ultimately responsible for all activities and services provided by my firm.

Item 7 – Requirements for State-Registered Advisers – Legal and Financial Disclosure

I have not been the subject of any client arbitrations or similar legal disputes.