



## **Rolek Wealth Management LLC d/b/a Rolek Retirement Planning**

### **Form ADV Part 2A – Disclosure Brochure**

**Effective: January 11, 2024**

This Form ADV Part 2A ("Disclosure Brochure") provides information about the qualifications and business practices of Rolek Wealth Management LLC d/b/a Rolek Retirement Planning ("RWM" or the "Advisor"). If you have any questions about the content of this Disclosure Brochure, please contact the Advisor at (267) 427-5667.

Rolek Wealth Management is a registered investment adviser with the U.S. Securities and Exchange Commission ("SEC"). The information in this Disclosure Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment adviser does not imply any specific level of skill or training. This Disclosure Brochure provides information through Rolek Wealth Management to assist you in determining whether to retain the Adviser.

Additional information about RWM and its Advisory Persons is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or CRD# 285351.

**Rolek Wealth Management LLC d/b/a Rolek Retirement Planning**  
1055 Westlakes Drive, Suite 300, Berwyn, PA 19312  
Phone: (267) 427-5667  
[www.rolekretirement.com](http://www.rolekretirement.com)

## Item 2 – Material Changes

---

Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about the Advisory Persons of RWM. For convenience, the Advisor has combined these documents into a single disclosure document.

RWM believes that communication and transparency are the foundation of its relationship with clients and will continually strive to provide you with complete and accurate information at all times. RWM encourages all current and prospective clients to read this Disclosure Brochure and discuss any questions you may have with the Advisor.

### Material Changes

The following material changes have been made to this Disclosure Brochure since the last filing and distribution to Clients:

- The Advisor is transitioning as a state registered advisor to an advisor registered with the U.S. Securities and Exchange Commission ("SEC").

### Future Changes

From time to time, the Advisor may amend this Disclosure Brochure to reflect changes in business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to you annually and if a material change occurs.

You may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or CRD# 285351. You may also request a copy of this Disclosure Brochure at any time by contacting the Advisor at (267) 427-5667.

## **Item 3 – Table of Contents**

---

<b>Item 1 – Cover Page</b>	<b>1</b>
<b>Item 2 – Material Changes</b>	<b>2</b>
<b>Item 3 – Table of Contents</b>	<b>3</b>
<b>Item 4 – Advisory Services</b>	<b>4</b>
A. Firm Information	4
B. Advisory Services Offered	4
C. Client Account Management	5
D. Wrap Fee Program	6
E. Assets Under Management	6
<b>Item 5 – Fees and Compensation</b>	<b>6</b>
A. Fees for Advisory Services	6
B. Fee Billing	7
C. Other Fees and Expenses	7
D. Advance Payment of Fees and Termination	7
E. Compensation for Sales of Securities	8
<b>Item 6 – Performance-Based Fees and Side-By-Side Management</b>	<b>8</b>
<b>Item 7 – Types of Clients</b>	<b>8</b>
<b>Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss</b>	<b>9</b>
A. Methods of Analysis	9
B. Risk of Loss	9
<b>Item 9 – Disciplinary Information</b>	<b>10</b>
<b>Item 10 – Other Financial Industry Activities and Affiliations</b>	<b>10</b>
<b>Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading</b>	<b>10</b>
A. Code of Ethics	10
B. Personal Trading with Material Interest	11
C. Personal Trading in Same Securities as Clients	11
D. Personal Trading at Same Time as Client	11
<b>Item 12 – Brokerage Practices</b>	<b>11</b>
A. Recommendation of Custodian[s]	11
B. Aggregating and Allocating Trades	12
<b>Item 13 – Review of Accounts</b>	<b>12</b>
A. Frequency of Reviews	12
B. Causes for Reviews	12
C. Review Reports	12
<b>Item 14 – Client Referrals and Other Compensation</b>	<b>12</b>
A. Compensation Received by RWM	12
B. Compensation for Client Referrals	13
<b>Item 16 – Investment Discretion</b>	<b>13</b>
<b>Item 17 – Voting Client Securities</b>	<b>13</b>
<b>Item 18 – Financial Information</b>	<b>13</b>
<b>Item 19 – Requirements for State Registered Advisors</b>	<b>13</b>
A. Educational Background and Business Experience of Principal Officer	13
B. Other Business Activities of Principal Officer	14
C. Performance Fee Calculations	14
D. Disciplinary Information	14
E. Material Relationships with Issuers of Securities	14
<b>Form ADV Part 2A – Appendix 1</b>	<b>15</b>
<b>Form ADV Part 2B – Brochure Supplement</b>	<b>22</b>
<b>Privacy Policy</b>	<b>26</b>

---

## **Item 4 – Advisory Services**

---

### **A. Firm Information**

Rolek Wealth Management LLC d/b/a Rolek Retirement Planning (“RWM” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). The Advisor is organized as a Limited Liability Company (“LLC”) under the laws of Pennsylvania. RWM was founded in September 2016 and is owned and operated by Kyle J. Rolek (Principal and Chief Compliance Officer). This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by RWM.

### **B. Advisory Services Offered**

RWM offers financial planning and investment advisory services to individuals, high net worth individuals, trusts, and retirement accounts (each referred to as a “Client”).

The Advisor serves as a fiduciary to Clients, as defined under the applicable laws and regulations. As a fiduciary, the Advisor upholds a duty of loyalty, fairness and good faith towards each Client and seeks to mitigate potential conflicts of interest. RWM's fiduciary commitment is further described in the Advisor's Code of Ethics. For more information regarding the Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

#### Financial Planning Services

RWM will typically provide a variety of financial planning and consulting services to Clients, pursuant to a written financial planning agreement. Services are offered in several areas of a Client's financial situation, depending on their goals and objectives. Generally, such financial planning services involve preparing a formal financial plan or rendering a specific financial consultation based on the Client's financial goals and objectives. This planning or consulting may encompass one or more areas of need, including but not limited to, retirement planning, investment planning, cash flow planning, healthcare planning and other areas of a Client's financial situation.

A financial plan developed for or financial consultation rendered to the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs, commence or alter retirement savings, establish or revise retirement cash flow plans, and establish or alter charitable giving programs. RWM may also refer Clients to an accountant, attorney or another specialist, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of Client's financial situation, observations, and recommendations. For consulting or ad-hoc engagements, the Advisor may not provide a written summary. Plans or consultations are typically completed within six (6) months of the contract date, assuming all information and documents requested are provided promptly.

Financial planning and consulting recommendations pose a conflict between the interests of the Advisor and the interests of the Client. For example, the Advisor has an incentive to recommend that Clients engage the Advisor for investment management services or to increase the level of investment assets with the Advisor, as it would increase the advisory fees paid to the Advisor. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to implement the transaction through the Advisor.

#### Investment Management Services

RWM provides customized investment advisory solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary and non-discretionary investment management and related advisory services. RWM works closely with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create a portfolio strategy.

RWM will construct an investment portfolio, consisting of low-cost, diversified mutual funds and/or exchange-traded funds ("ETFs") to achieve the Client's investment goals. The Advisor may also utilize individual stocks and bonds to meet the needs of its Clients. The Advisor may retain certain legacy investments based on portfolio fit and/or tax considerations.

RWM's investment strategy is primarily long-term focused, but the Advisor may buy, sell or re-allocate positions that have been held for less than one year to meet the objectives of the Client or due to market conditions. RWM will construct, implement and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to acceptance by the Advisor.

RWM evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. RWM may recommend, on occasion, redistributing investment allocations to diversify the portfolio. RWM may recommend specific positions to increase sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement. RWM may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of the Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client's risk tolerance.

*Retirement Accounts* – When deemed to be in the Client's best interest, the Advisor will recommend that a Client take a distribution from an ERISA sponsored plan or to roll over the assets to an Individual Retirement Accounts ("IRAs"), or recommend a similar transaction including rollovers from one ERISA sponsored Plan to another, one IRA to another IRA, or from one type of account to another account (e.g. commission-based account to fee-based account). In such instances, the Advisor will serve as an investment fiduciary as that term is defined under The Employee Retirement Income Security Act of 1974 ("ERISA") and/or the Internal Revenue Code ("IRC"), as applicable, which are laws governing retirement accounts. Such a recommendation creates a conflict of interest if the Advisor will earn a new (or increase its current) advisory fee as a result of the transaction. No client is under any obligation to roll over a retirement account to an account managed by the Advisor.

At no time will RWM accept or maintain custody of a Client's funds or securities, except for the limited authority as outlined in Item 15 – Custody. All Client assets will be managed within their designated account at the Custodian, pursuant to the terms of the Client investment advisory agreement. Please see Item 12 – Brokerage Practices.

#### Retirement Planning Seminars

RWM may provide retirement planning educational seminars for individuals seeking general advice on retirement planning, investing, and other areas of personal finance. RWM's seminars and workshops are educational in nature and do not involve the sale of investment products. Information presented will not be based on any one person's need, nor do we provide individualized investment advice to attendees during our general sessions.

#### Rolek Retirement Planning Book

RWM has published a book titled '*Rolek Retirement Planning*.' The book addresses important topics related to retirement planning such as lifestyle planning, expense planning, income planning, investment planning, tax planning, healthcare planning, and estate planning. The contents of the book are provided for general education and informational purposes only. The information found in the book is not tailored to a consumer's individual financial circumstances, goals, investment objectives, risk tolerance, or other relevant factors. The consumer should not use the book as the basis for making any financial decisions and should instead consult a financial, tax, or legal professional to determine the applicability of the information to their unique situation. RWM and/or Kyle Rolek may receive compensation in the form of book royalties from the sale of this book.

### **C. Client Account Management**

Prior to engaging RWM to provide investment advisory services, each Client is required to enter into one or more agreements with the Advisor that define the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Strategy – RWM, in connection with the Client, will develop a strategy that seeks to achieve the Client's investment goals and objectives.
- Asset Allocation – RWM will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance for risk of each Client.
- Portfolio Construction – RWM will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – RWM will provide investment management and ongoing oversight of the Client's investment portfolio.

#### **D. Wrap Fee Program**

RWM generally includes securities transaction fees for certain mutual funds, equities, fixed income and options (herein "Covered Costs") together with its investment management fees. Including these fees into a single asset-based fee is considered a "Wrap Fee Program." The Advisor customizes its investment management services for its Clients. The Advisor sponsors the RWM Wrap Fee Program solely as a supplemental disclosure regarding the combination of fees. Depending on the level of trading required for the Client's account[s] in a particular year, the Client may pay more or less in total fees than if the Client paid its own transaction fees. Please see Appendix 1 – Wrap Fee Program Brochure, which is included as a supplement to this Disclosure Brochure.

#### **E. Assets Under Management**

As of December 31, 2023 the Advisor manages \$108,106,392 in Client assets, all of which are on a discretionary basis. Clients may request more current information at any time by contacting the Advisor.

### **Item 5 – Fees and Compensation**

---

The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client engaging the Advisor for services described herein shall be required to enter into one or more written agreements with the Advisor.

#### **A. Fees for Advisory Services**

##### Financial Planning Services

RWM offers financial planning services for a fixed fee ranging from \$500 to \$5,000. An estimate for total costs will be provided to the Client prior to engaging in these services. Financial planning fees may be negotiable based on the nature and complexity of the services to be provided and the overall relationship with the Advisor.

##### Investment Management Services

Investment advisory fees are paid quarterly, in advance of each calendar quarter, pursuant to the terms of the agreement. Investment advisory fees are based on the market value of assets under management at the end of the prior calendar quarter and range from 0.50% to 1.00% annually based on several factors, including: the complexity of the services to be provided, the level of assets to be managed, and the overall relationship with the Advisor. Relationships with multiple objectives, specific reporting requirements, portfolio restrictions and other complexities may be charged a higher fee.

The investment advisory fee in the first quarter of service is prorated from the inception date of the account[s] to the end of the first quarter. Fees may be negotiable at the sole discretion of the Advisor. The Client's fees will take into consideration the aggregate assets under management with the Advisor. All securities held in accounts

managed by RWM will be independently valued by the Custodian. RWM will conduct periodic reviews of the Custodian's valuations.

#### Retirement Planning Seminars

Retirement planning educational seminars and workshops are offered on a fixed fee basis. The fixed fee will be agreed upon before the engagement. The fixed fee can range up to \$50 per participant and may be negotiable. The fee is based on the content, amount of research conducted, number of hours of preparation needed, and the number of attendees.

### **B. Fee Billing**

#### Financial Planning Services

Fixed financial planning fees may be invoiced up to one hundred percent (100%) of the expected total fee upon execution of the financial planning agreement. The Advisor will not collect fees that are greater than \$500 if the services will be for six months or more in the future. The balance shall be invoiced upon completion of the agreed upon deliverable[s]. Ongoing financial planning fees are invoiced monthly in advance and due upon receipt.

#### Investment Management Services

Investment advisory fees are calculated by the Advisor or its delegate and deducted from the Client's account[s] at the Custodian. The Advisor shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client's account[s] at the beginning of the respective quarter. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management with RWM at the end of the prior quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the investment advisory fee. In addition, the Advisor will provide the Client a report itemizing the fee, including the calculation period covered by the fee, the account value and the methodology used to calculate the fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the Custodian's brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting advisory fees to be deducted by RWM directly from their account[s] held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.

#### Retirement Planning Seminars

For retirement planning educational seminars paid for directly by attendees or participants, the fee is due in full prior to the event.

### **C. Other Fees and Expenses**

Clients may incur certain fees or charges imposed by third parties, other than RWM, in connection with investments made on behalf of the Client's account[s]. RWM includes Covered Costs as part of its overall investment advisory fee through the RWM Wrap Fee Program. Securities transaction fees for Client-directed trades may be charged back to the Client. Please see Item 4.D. above as well as Appendix 1 – Wrap Fee Program Brochure.

In addition, all fees paid to RWM for investment advisory services or part of the RWM Wrap Fee Program are separate and distinct from the expenses charged by mutual funds and ETFs to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client may be able to invest in these products directly, without the services of RWM, but would not receive the services provided by RWM which are designed, among other things, to assist the Client in determining which products or services are most appropriate for each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by RWM to fully understand the total fees to be paid. Please refer to Item 12 – Brokerage Practices for additional information.

### **D. Advance Payment of Fees and Termination**

#### Financial Planning Services

---

Rolek Wealth Management LLC d/b/a Rolek Retirement Planning  
1055 Westlakes, Suite 300, Berwyn, PA 19312  
Phone: (267) 427-5667  
<http://www.rolekretirement.com>



For ongoing financial planning services, RWM is compensated in advance of the month in which ongoing financial planning services are rendered. Additionally, RWM may require an advance deposit for one-time financial planning engagements as described above. Either party may terminate the financial planning agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the financial planning agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. The Advisor will refund any unearned, prepaid financial planning fees from the effective date of termination. The Client's financial planning agreement with the Advisor is non-transferable without the Client's prior consent.

#### Investment Management Services

RWM is compensated for its investment management services in advance of the quarter in which investment advisory services are rendered. Either party may terminate the investment advisory agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the investment advisory agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Upon termination, the Advisor will refund any unearned, prepaid investment advisory fees from the effective date of termination to the end of the quarter. The Client's investment advisory agreement with the Advisor is non-transferable without the Client's prior consent.

#### Retirement Planning Seminars

In the event of Client cancellation or rescheduling, the Client will still be responsible for reimbursement of any non-refundable travel expenses already incurred, and will provide payment for 50% of the fixed fee if the cancellation occurs within thirty (30) days of the event. Payment of 50% of the fixed fee due to Client cancellation within thirty (30) days is made to compensate RWM for time spent preparing for the event, as the majority of seminar, workshop, and speaking engagement work effort is made prior to the actual date of the event itself, and typically well in advance of thirty (30) days prior to the event.

#### **E. Compensation for Sales of Securities**

RWM does not buy or sell securities to earn commissions and does not receive any compensation for securities transactions in any Client account, other than the fees noted above.

#### Insurance Agency Affiliations

Certain Advisory Persons are also licensed as independent insurance professionals. As an independent insurance professional, the Advisory Person may earn commission-based compensation for selling insurance products, including insurance products they sell to Clients. Insurance commissions earned by these persons are separate and in addition to advisory fees. This practice presents a conflict of interest because the person providing investment advice on behalf of the Advisor who is also an insurance agent has an incentive to recommend insurance products to Clients for the purpose of generating commissions rather than solely based on your needs. However, you are under no obligation, contractually or otherwise, to purchase insurance products through any Advisory Person affiliated with the Advisor.

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

---

RWM does not charge performance-based fees for its investment advisory services. The fees charged by RWM are as described in Item 5 above and are not based upon the capital appreciation of the funds or securities held by any Client.

RWM does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

#### **Item 7 – Types of Clients**

---



RWM offers investment advisory services to individuals, high net worth individuals, trusts, and estates. The amount of each type of Client is available on the Advisor's Form ADV Part 1A. These amounts may change over time and are updated at least annually by the Advisor. RWM generally does not impose a minimum size for establishing a relationship.

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

---

### **A. Methods of Analysis**

RWM primarily employs a fundamental analysis method in developing investment strategies for its Clients. Research and analysis from RWM are derived from numerous sources, including financial media companies, third party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

*Fundamental analysis* utilizes economic and business indicators as investment selection criteria. These criteria generally consist of ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis method may lose value and may have a negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

As noted above, RWM generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. RWM will typically hold all or a portion of a security for more than a year, but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, RWM may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector or asset class.

### **B. Risk of Loss**

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. RWM will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

While the methods of analysis help the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in these methods of analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account[s]. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. The following are some of the risks associated with the Advisor's investment strategy:

#### Market Risks

The value of a Client's holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad. This risk is linked to the performance of the overall financial markets.

#### ETF Risks

The performance of ETFs is subject to market risks, including the possible loss of principal. The price of the ETFs will fluctuate with the price of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs have a large bid-ask spread and low trading volume. The price of an ETF fluctuates based upon the market movements and may dissociate from the index being tracked by the ETF or the price of the underlying investments. An ETF purchased or sold at one point in the day may have a different price than the same ETF purchased or sold a short time later.

#### Bond Risks

Bonds are subject to specific risks, including the following: (1) interest rate risks, i.e. the risk that bond prices will fall if interest rates rise, and vice versa, the risk depends on two things, the bond's time to maturity, and the coupon rate of the bond. (2) reinvestment risk, i.e. the risk that any profit gained must be reinvested at a lower rate than was previously being earned, (3) inflation risk, i.e. the risk that the cost of living and inflation increase at a rate that exceeds the income investment thereby decreasing the investor's rate of return, (4) credit default risk, i.e. the risk associated with purchasing a debt instrument which includes the possibility of the company defaulting on its repayment obligation, (5) rating downgrades, i.e. the risk associated with a rating agency's downgrade of the company's rating which impacts the investor's confidence in the company's ability to repay its debt and (6) Liquidity Risks, i.e. the risk that a bond may not be sold as quickly as there is no readily available market for the bond.

#### Mutual Fund Risks

The performance of mutual funds is subject to market risks, including the possible loss of principal. The price of the mutual funds will fluctuate with the value of the underlying securities that make up the funds. The price of a mutual fund is typically set daily therefore a mutual fund purchased at one point in the day will typically have the same price as a mutual fund purchased later that same day.

**Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.**

### **Item 9 – Disciplinary Information**

---

**There are no legal, regulatory or disciplinary events involving RWM or Mr. Rolek.** RWM values the trust Clients place in the Advisor. The Advisor encourages Clients to perform the requisite due diligence on any advisor or service provider that the Client engages. The backgrounds of the Advisor and its Advisory Persons are available on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or CRD# 285351.

### **Item 10 – Other Financial Industry Activities and Affiliations**

---

#### Insurance Agency Affiliations

Mr. Rolek is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Rolek's role with RWM. As an insurance professional, Mr. Rolek receives customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Rolek is not required to offer insurance products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This causes a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Rolek or the Advisor.

## **Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

---

### **A. Code of Ethics**

RWM has implemented a Code of Ethics (the “Code”) that defines the Advisor’s fiduciary commitment to each Client. As a single member firm, this Code applies solely to Mr. Rolek, as CCO of RWM (“Supervised Person”). The Code was developed to provide general ethical guidelines and specific instructions regarding the Advisor’s duties to the Client. RWM and its Supervised Person owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of its Supervised Person to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code covers a range of topics that address employee ethics and conflicts of interest. To request a copy of the Code, please contact the Advisor at (267) 427-5667.

### **B. Personal Trading with Material Interest**

RWM allows the purchase or sale of the same securities that may be recommended to and purchased on behalf of Clients. RWM does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund, or advise an investment company. RWM does not have a material interest in any securities traded in Client accounts.

### **C. Personal Trading in Same Securities as Clients**

RWM allows the purchase or sale of the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities that are recommended (purchase or sell) to Clients presents a conflict of interest that, as fiduciaries, must be disclosed to Clients and mitigated through policies and procedures. As noted above, the Advisor has adopted the Code to address insider trading (material, non-public information controls); gifts and entertainment; outside business activities and personal securities reporting. When trading for personal accounts, its Supervised Person has a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can potentially be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material, non-public information. This risk is mitigated by RWM by conducting a coordinated review of personal accounts and the accounts of the Clients. The Advisor has also adopted written policies and procedures to detect the misuse of material, non-public information.

### **D. Personal Trading at Same Time as Client**

While RWM allows its Supervised Person to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterward. **At no time will RWM, or its Supervised Person, transact in any security to the detriment of any Client.**

## **Item 12 – Brokerage Practices**

---

### **A. Recommendation of Custodian[s]**

RWM does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The Client will engage the broker-dealer/custodian (herein the “Custodian”) to safeguard Client assets and authorize RWM to direct trades to the Custodian as agreed upon in the investment management agreement. Furthermore, RWM does not have the discretionary authority to negotiate commissions on behalf of Clients on a trade-by-trade basis.

While RWM does not exercise discretion over the selection of the Custodian, it may recommend the Custodian[s] to Clients for custody and execution services. Clients are not obligated to use the Custodian recommended by the Advisor and will not incur any extra fee or cost associated with using a custodian not recommended by RWM. However, the Advisor may be limited in the services it can provide if the recommended Custodian is not engaged. RWM may recommend the Custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, its reputation and/or the location of the Custodian’s offices. RWM will generally recommend that Clients engage with Shareholders Service Group, LLC

(“SSG”) and custody their account[s] at Pershing, LLC (“Pershing”), a FINRA-registered broker-dealer and member SIPC. Pershing will serve as the Client’s “qualified custodian.” RWM maintains an institutional relationship with SSG, whereby the Advisor receives economic benefits from SSG. Please see Item 14 below.

Following are additional details regarding the brokerage practices of the Advisor:

**1. Soft Dollars** – Soft dollars are revenue programs offered by broker-dealers/custodians whereby an advisor enters into an agreement to place security trades with a broker-dealer/custodian in exchange for research and other services. **RWM does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodian. Please see Item 14 below.**

**2. Brokerage Referrals** – RWM does not receive any compensation from any third party in connection with the recommendation for establishing an account.

**3. Directed Brokerage** – All Clients are serviced on a “directed brokerage basis,” where RWM will place trades within the established account[s] at the Custodian designated by the Client. Furthermore, all Client accounts are traded within their respective account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor’s own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client’s account[s]). RWM will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the Custodian.

## **B. Aggregating and Allocating Trades**

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of the order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the Custodian. RWM will execute its transactions through the Custodian as directed by the Client. RWM may aggregate orders in a block trade or trades when securities are purchased or sold through the Custodian for multiple (discretionary) accounts in the same trading day. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage any particular Client accounts

## **Item 13 – Review of Accounts**

---

### **A. Frequency of Reviews**

Securities in Client accounts are monitored on a regular and continuous basis by Mr. Rolek, Chief Compliance Officer of RWM. Formal reviews are generally conducted at least annually or more frequently depending on the needs of the Client.

### **B. Causes for Reviews**

In addition to the investment monitoring noted in Item 13 A., each Client account shall be reviewed at least annually. Reviews may be conducted more frequently at the Client’s request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client’s financial situation, and/or large deposits or withdrawals in the Client’s account[s]. The Client is encouraged to notify RWM if changes occur in the Client’s personal financial situation that might adversely affect the Client’s investment plan. Additional reviews may be triggered by material market, economic or political events.

### **C. Review Reports**

The Client will receive brokerage statements no less than quarterly from the Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian’s website so that the Client may view these reports and their account activity. Client brokerage

statements will include all positions, transactions and fees relating to the Client's account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

## **Item 14 – Client Referrals and Other Compensation**

---

### **A. Compensation Received by RWM**

#### Participation in Institutional Advisor Platform

RWM has established an institutional relationship with SSG, whereby accounts are custodied through Pershing (“Custodian”) to assist the Advisor in managing Client account[s]. Access to SSG’s platform is provided at no charge to the Advisor. The Advisor receives access to software and related support without cost because the Advisor renders investment advisory services to Clients that maintain assets at SSG. The software and related systems support may benefit the Advisor, but not its Clients directly. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from SSG creates a potential conflict of interest since these benefits may influence the Advisor's recommendation of SSG over one that does not furnish similar software, systems support, or services.

Additionally, the Advisor may receive the following benefits from SSG: receipt of duplicate Client confirmations and bundled duplicate statements; access to a trading desk that exclusively services its institutional participants; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to Client accounts; and access to an electronic communication network for Client order entry and account information.

### **B. Compensation for Client Referrals**

RWM does not compensate, either directly or indirectly, any persons who are not supervised persons for Client referrals.

## **Item 15 – Custody**

---

RWM does not accept or maintain custody of any Client accounts, except for the authorized deduction of the Advisor’s fees. All Clients must place their assets with a “qualified custodian.” Clients are required to engage the Custodian to retain their funds and securities and direct RWM to utilize the Custodian for the Client’s security transactions. Clients should review statements provided by the Custodian and compare to any reports provided by RWM to ensure accuracy, as the custodian does not perform this review. For more information about custodians and brokerage practices, see Item 12 – Brokerage Practices.

## **Item 16 – Investment Discretion**

---

RWM generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by RWM. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an investment advisory agreement containing all applicable limitations to such authority. All discretionary trades made by RWM will be in accordance with each Client's investment objectives and goals.

## **Item 17 – Voting Client Securities**

---

RWM does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

## **Item 18 – Financial Information**

---

Neither RWM nor Mr. Rolek have any adverse financial situations that would reasonably impair the ability of RWM to meet all obligations to its Clients. Neither RWM nor Mr. Rolek have been subject to a bankruptcy or financial compromise. RWM is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect advance fees of \$1,200 or more for services to be performed six (6) months or more in future.



## **Rolek Wealth Management LLC d/b/a Rolek Retirement Planning**

### **Form ADV Part 2A – Appendix 1 ("Wrap Fee Program Brochure")**

**Effective: January 11, 2024**

This Form ADV2A – Appendix 1 ("Wrap Fee Program Brochure") provides information about the qualifications and business practices of Rolek Wealth Management LLC d/b/a Rolek Retirement Planning ("RWM" or the "Advisor") when offering services pursuant to a wrap program. This Wrap Fee Program Brochure shall always be accompanied by the RWM Disclosure Brochure, which provides complete details on the business practices of the Advisor. If you did not receive the complete RWM Disclosure Brochure or you have any questions about the contents of this Wrap Fee Program Brochure or the RWM Disclosure Brochure, please contact the Advisor at (267) 427-5667.

RWM is a registered investment advisor with the U.S. Securities and Exchange Commission ("SEC"). The information in this Wrap Fee Program Brochure has not been approved or verified by the U.S. Securities and Exchange Commission ("SEC") or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Wrap Fee Program Brochure provides information about RWM to assist you in determining whether to retain the Advisor.

Additional information about RWM and its Advisory Persons is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or CRD# 285351.



## **Item 2 – Material Changes**

---

Form ADV 2 – Appendix 1 provides information about a variety of topics relating to an Advisor’s business practices and conflicts of interest. In particular, this Wrap Fee Program Brochure discusses the Wrap Fee Program offering by the Advisor.

### Material Changes

The following material changes have been made to the content of this Wrap Fee Program Brochure since the last filing and distribution to Clients:

- The Advisor is transitioning as a state registered advisor to an advisor registered with the U.S. Securities and Exchange Commission (“SEC”).

### Future Changes

From time to time, the Advisor may amend this Wrap Fee Program Brochure to reflect changes in business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Wrap Fee Program Brochure (along with the complete RWM Disclosure Brochure) or a summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of RWM.

You may view this Wrap Fee Program Brochure and the current Disclosure Brochure on-line at the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor’s firm name or CRD# 285351. You may also request a copy of this Disclosure Brochure at any time, by contacting the Advisor at (267) 427-5667.

## **Item 3 – Table of Contents**

---

<b>Item 1 – Cover Page</b>	<b>15</b>
<b>Item 2 – Material Changes</b>	<b>16</b>
<b>Item 3 – Table of Contents</b>	<b>16</b>
<b>Item 4 – Services Fees and Compensation</b>	<b>17</b>
<b>Item 5 – Account Requirements and Types of Clients</b>	<b>18</b>
<b>Item 6 – Portfolio Manager Selection and Evaluation</b>	<b>18</b>
<b>Item 7 – Client Information Provided to Portfolio Managers</b>	<b>20</b>
<b>Item 8 – Client Contact with Portfolio Managers</b>	<b>20</b>
<b>Item 9 – Additional Information</b>	<b>20</b>

## Item 4 – Services Fees and Compensation

---

### A. Services

RWM provides customized investment advisory services for its Clients. This Wrap Fee Program Brochure is provided as a supplement to the RWM Form ADV Part 2A (“Disclosure Brochure”). This Wrap Fee Program Brochure is provided along with the complete Disclosure Brochure to provide full details of the business practices and fees when selecting RWM as your investment advisor.

As part of the investment advisory fees noted in Item 5 – Fees and Compensation of the Disclosure Brochure, RWM will include securities transaction fees for mutual funds, equities, fixed income and options (herein “Covered Costs”) as part of the overall investment advisory fee, when deemed to be in the Client’s best interest. Securities regulations often refer to this combined fee structure as a “Wrap Fee Program.” The Advisor sponsors the RWM Wrap Fee Program.

The sole purpose of this Wrap Fee Program Brochure is to provide additional disclosure relating the combination of Covered Costs into a single “bundled” investment advisory fee. This Wrap Fee Program Brochure references back to the RWM Disclosure Brochure in which this Wrap Fee Program Brochure serves as an Appendix. **Please see Item 4 – Advisory Services of the Disclosure Brochure for details on RWM’s investment philosophy and related services.**

### B. Program Costs

Advisory services provided by RWM are generally offered in a Wrap Fee Program structure whereby Covered Costs are included in the overall investment advisory fee paid to RWM. As the level of activity in a Client’s account[s] may vary from year to year, the annual cost to the Client may be more or less than engaging for advisory services where the Covered Costs are borne separately by the Client. The cost of the Wrap Fee Program varies depending on the amount assets invested in the program, however, the Client is not charged more if there is higher trading activity or other Covered Costs. A Wrap Fee structure presents a conflict of interest as the Advisor is incentivized to limit the number of trades placed in the Client’s account[s] or to utilize securities that do not have transaction fees. The Advisor will only place Client assets into a Wrap Fee Program when it is believed to be in the Client’s best interest. **Please see Item 5 – Fees and Compensation of the Disclosure Brochure for complete details on fees.**

### C. Fees

Investment advisory fees are paid quarterly, in advance of each calendar quarter, pursuant to the terms of the agreement. Investment advisory fees are based on the market value of assets under management at the end of the prior calendar quarter and range from 0.50% to 1.00% annually based on several factors, including: the complexity of the services to be provided, the level of assets to be managed, and the overall relationship with the Advisor. Relationships with multiple objectives, specific reporting requirements, portfolio restrictions and other complexities may be charged a higher fee.

The investment advisory fee in the first quarter of service is prorated from the inception date of the account[s] to the end of the first quarter. Fees may be negotiable at the sole discretion of the Advisor. The Client’s fees will take into consideration the aggregate assets under management with the Advisor. All securities held in accounts managed by RWM will be independently valued by the Custodian. RWM will conduct periodic reviews of the Custodian’s valuations.

Clients will incur certain fees or charges imposed by third parties in connection with investments made on behalf of the Client’s account[s]. As noted above, the Wrap Fee Program includes Covered Costs incurred in connection with the discretionary investment management services provided by RWM as part of its overall investment advisory fee. In addition, all fees paid to RWM for investment advisory services or part of the Wrap Fee Program are separate and distinct from the expenses charged by mutual funds and exchange-traded funds (“ETFs”) to their shareholders, if applicable. These fees and expenses are described in each fund’s prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account

administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. Additionally, account activity fees, such as liquidation of equities positions, IRA fees, short-term redemption fees on mutual funds and other miscellaneous fees and expenses as outlined in the account opening paperwork executed with the Custodian, are generally charged to the Client. Clients are encouraged to refer to the account opening paperwork executed with the Custodian for an outline of all third party fees covered under this Wrap Fee Program. The Advisor does not control nor share in these third party fees. The Client should review all fees charged by the fund[s], third parties and the fees charged by RWM to fully understand the total fees to be paid. Please see Item 5 C. – Other Fees and Expenses of the Disclosure Brochure (included with this Wrap Fee Program Brochure).

#### **D. Compensation**

RWM is the sponsor and portfolio manager of this Wrap Fee Program. RWM receives investment advisory fees paid by Clients for participating in the Wrap Fee Program and pays the Covered Costs associated with the management of the normal trading activity in the Client's account[s].

### **Item 5 – Account Requirements and Types of Clients**

---

RWM offers investment advisory services to individuals, high net worth individuals, trusts and estates. RWM generally does not impose a minimum account size for establishing a relationship. Please see Item 7 – Types of Clients of the Disclosure Brochure for additional information.

### **Item 6 – Portfolio Manager Selection and Evaluation**

---

#### **Portfolio Manager Selection**

RWM serves as sponsor and as portfolio manager for the services under this Wrap Fee Program.

#### **Related Persons**

RWM personnel serve as portfolio managers for this Wrap Fee Program. RWM does not serve as a portfolio manager for any third party Wrap Fee Programs.

#### **Performance-Based Fees**

RWM does not charge performance-based fees for its investment advisory services. The fees charged by RWM are as described in Item 5 above and are not based upon the capital appreciation of the funds or securities held by any Client.

RWM does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

#### **Supervised Persons**

RWM Advisory Persons serve as portfolio managers for all accounts, including the services described in this Wrap Fee Program Brochure. Details of the advisory services provided are included in Item 4 – Fees and Compensation of the Disclosure Brochure.

#### **Methods of Analysis**

Please see Item 8 of the Disclosure Brochure (included with this Wrap Fee Program Brochure) for details on the research and analysis methods employed by the Advisor.

#### **Risk of Loss**

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. RWM will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

While the methods of analysis help the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in these methods of analysis may lose value and may have negative investment performance. The Advisor performs ongoing analysis on a regular and continuous basis to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account[s]. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. The following are some of the risks associated with the Advisor's investment approach:

#### Market Risks

The value of a Client's holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad. This risk is linked to the performance of the overall financial markets.

#### ETF Risks

The performance of ETFs is subject to market risks, including the possible loss of principal. The price of the ETFs will fluctuate with the price of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs have a large bid-ask spread and low trading volume. The price of an ETF fluctuates based upon the market movements and may dissociate from the index being tracked by the ETF or the price of the underlying investments. An ETF purchased or sold at one point in the day may have a different price than the same ETF purchased or sold a short time later.

#### Bond Risks

Bonds are subject to specific risks, including the following: (1) interest rate risks, i.e. the risk that bond prices will fall if interest rates rise, and vice versa, the risk depends on two things, the bond's time to maturity, and the coupon rate of the bond. (2) reinvestment risk, i.e. the risk that any profit gained must be reinvested at a lower rate than was previously being earned, (3) inflation risk, i.e. the risk that the cost of living and inflation increase at a rate that exceeds the income investment thereby decreasing the investor's rate of return, (4) credit default risk, i.e. the risk associated with purchasing a debt instrument which includes the possibility of the company defaulting on its repayment obligation, (5) rating downgrades, i.e. the risk associated with a rating agency's downgrade of the company's rating which impacts the investor's confidence in the company's ability to repay its debt and (6) Liquidity Risks, i.e. the risk that a bond may not be sold as quickly as there is no readily available market for the bond.

#### Mutual Fund Risks

The performance of mutual funds is subject to market risks, including the possible loss of principal. The price of the mutual funds will fluctuate with the value of the underlying securities that make up the funds. The price of a mutual fund is typically set daily therefore a mutual fund purchased at one point in the day will typically have the same price as a mutual fund purchased later that same day.

**Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to**

**discuss these risks with the Advisor. Please see Item 8 B. – Risk of Loss of the Disclosure Brochure for details on investment risks.**

### **Proxy Voting**

RWM does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

## **Item 7 – Client Information Provided to Portfolio Managers**

---

RWM is the sponsor and sole portfolio manager for the Wrap Fee Program. The Advisor does not share Client information with other portfolio managers because it is the sole portfolio manager for this Wrap Fee Program. Please also see the RWM Privacy Policy (included after this Wrap Fee Program Brochure).

## **Item 8 – Client Contact with Portfolio Managers**

---

RWM is a full-service investment management advisory firm. Clients always have direct access to the Portfolio Managers at RWM.

## **Item 9 – Additional Information**

---

### **A. Disciplinary Information and Other Financial Industry Activities and Affiliations**

**There are no legal, regulatory or disciplinary events involving RWM or Mr. Rolek.** RWM values the trust Clients place in the Advisor. The Advisor encourages Clients to perform the requisite due diligence on any advisor or service provider that the Client engages. The backgrounds of the Advisor and its Advisory Persons are available on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or CRD# 285351.

Please see Item 9 of the RWM Disclosure Brochure, as well as Item 3 of Mr. Rolek's Brochure Supplement (included with this Wrap Fee Program Brochure) for additional information on how to research the background of the Advisor and its Advisory Persons.

#### Other Financial Activities and Affiliations

Please see Items 10 and 14 of the Form ADV Part 2A – Disclosure Brochure (included with this Wrap Fee Program Brochure).

### **B. Code of Ethics, Review of Accounts, Client Referrals, and Financial Information**

RWM has implemented a Code of Ethics (the "Code") that defines the Advisor's fiduciary commitment to each Client. This Code applies to all persons subject to RWM's compliance program ("Supervised Persons"). Complete details on the RWM Code can be found under Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading of the Disclosure Brochure.

#### Review of Accounts

Securities in Client accounts are monitored on a regular and continuous basis by Mr. Rolek, Chief Compliance Officer of RWM. Details of the review policies and practices are provided in Item 13 – Review of Accounts of the Disclosure Brochure.

#### Other Compensation

*Participation in Institutional Advisor Platform* – RWM has established an institutional relationship with SSG, whereby accounts are custodied through Pershing ("Custodian") to assist the Advisor in managing Client account[s]. Access to SSG's platform is provided at no charge to the Advisor. The Advisor receives access to

software and related support without cost because the Advisor renders investment advisory services to Clients that maintain assets at SSG. The software and related systems support may benefit the Advisor, but not its Clients directly. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from SSG creates a conflict of interest since these benefits may influence the Advisor's recommendation of SSG over one that does not furnish similar software, systems support, or services.

Please see Item 14 – Other Compensation of the Disclosure Brochure for details on additional compensation that may be received by RWM or Mr. Rolek. Mr. Rolek's Brochure Supplement provides details on any outside business activities and the associated compensation.

#### Client Referrals from Solicitors Compensation for Client Referrals

RWM does not compensate, either directly or indirectly, any persons who are not supervised persons, for Client referrals.

#### Financial Information

Neither RWM nor Mr. Rolek have any adverse financial situations that would reasonably impair the ability of RWM to meet all obligations to its Clients. Neither RWM nor Mr. Rolek have been subject to a bankruptcy or financial compromise. RWM is not required to deliver a balance sheet along with this Disclosure Brochure, as the firm does not collect advance fees of \$1,200 or more for services to be performed six (6) months or more in advance. Please see Item 18 – Financial Information of the Disclosure Brochure.



## **Form ADV Part 2B – Brochure Supplement**

**for**

**Kyle J. Rolek, CFP®  
Principal and Chief Compliance Officer**

**Effective: January 11, 2023**

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of Kyle J. Rolek (CRD# 5693355) in addition to the information contained in the Rolek Wealth Management LLC d/b/a Rolek Retirement Planning ("RWM" or the "Advisor", CRD# 285351) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the RWM Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (267) 427-5667.

Additional information about Mr. Rolek is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching his full name or Individual CRD# 5693355.



## Item 2 – Educational Background and Business Experience

---

Kyle J. Rolek, born in 1986, is dedicated to advising Clients of RWM as the Principal and Chief Compliance Officer. Mr. Rolek earned a Bachelor of Science in Economics and Business from Lafayette College in 2009. Mr. Rolek earned the CFP®, CERTIFIED FINANCIAL PLANNER™ designation in 2013. Additional information regarding Mr. Rolek's employment history is included below.

### Employment History:

Principal and Chief Compliance Officer, Rolek Wealth Management LLC d/b/a Rolek Retirement Planning	09/2016 to Present
Managing Member, Rolek Advisory LLC	07/2015 to 04/2017
Registered Representative, Arete Wealth Management LLC	03/2016 to 04/2016
Investment Advisor Representative, Access Advisors, LLC	03/2015 to 07/2015
Investment Advisor Representative, McAdam LLC	10/2014 to 03/2015
Registered Representative, Purshe Kaplan Sterling Investments, Inc.	10/2014 to 03/2015
Branch Manager, McAdam Financial Group	01/2012 to 10/2014
Registered Representative, ING Financial Partners, Inc.	07/2009 to 10/2014

### About the CFP® Designation

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP® (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP® Board").

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 (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- **Education** – 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, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP® Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- **Experience** – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- **Ethics** – Agree to be bound by CFP® Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- **Continuing Education** – 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 planning field; and
- **Ethics** – 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.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP® Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

---

### **Item 3 – Disciplinary Information**

***There are no legal, civil or disciplinary events to disclose regarding Mr. Rolek.*** Mr. Rolek has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Rolek.

Securities laws require an advisor to disclose any instances where the advisor or its Advisory Persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Rolek.***

However, the Advisor does encourage you to independently view the background of Mr. Rolek on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 5693355.

---

### **Item 4 – Other Business Activities**

#### Insurance Agency Affiliations

Mr. Rolek is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Rolek's role with RWM. As an insurance professional, Mr. Rolek receives customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Rolek is not required to offer insurance products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This presents a conflict of interest in recommending certain products of the insurance company. Clients are under no obligation to implement any recommendations made by Mr. Rolek or the Advisor.

---

### **Item 5 – Additional Compensation**

Mr. Rolek has additional business activities where compensation is received that are detailed in Item 4 above.

---

### **Item 6 – Supervision**

Mr. Rolek serves as the Principal and Chief Compliance Officer of RWM. Mr. Rolek can be reached at (267) 427-5667.

RWM has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of RWM. Furthermore, RWM is subject to regulatory oversight by various agencies. These agencies require registration by RWM and its Supervised Persons. As a registered entity, RWM is subject to examinations by regulators, which may be announced or unannounced. RWM is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

## Privacy Policy

Effective Date: January 11, 2024

### Our Commitment to You

Rolek Wealth Management LLC d/b/a Rolek Retirement Planning ("RWM" or the "Advisor") is committed to safeguarding the use of personal information of our Clients (also referred to as "you" and "your") that we obtain as your Investment Advisor, as described here in our Privacy Policy ("Policy").

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. RWM (also referred to as "we," "our" and "us") protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

RWM does not sell your non-public, personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal, non-public information is collected and used are set forth in this Policy.

### Why you need to know?

Registered Investment Advisors ("RIAs") must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

### What information do we collect from you?

Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number[s]	Income and expenses
E-mail address[es]	Investment activity
Account information (including other institutions)	Investment experience and goals

### What Information do we collect from other sources?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

### How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client's personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

### How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
<b>Servicing our Clients</b> We may share non-public, personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.	Yes	No
<b>Marketing Purposes</b> RWM does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where RWM or the client has a formal agreement with the financial institution. <b>We will only share information for purposes of servicing your accounts, not for marketing purposes.</b>	No	Not Shared
<b>Authorized Users</b> Your non-public, personal information may be disclosed to you and persons that we believe to be your authorized agent[s] or representative[s].	Yes	Yes
<b>Information About Former Clients</b> RWM does not disclose and does not intend to disclose non-public, personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

### Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically, we may revise this Policy, and will provide you with a revised policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public, personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

### Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (267) 427-5667.