

# **RoseRock Wealth Management, LLC**

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

**Effective: April 29, 2024**

This Form ADV Part 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of RoseRock Wealth Management, LLC (“RoseRock” or the “Advisor”). If you have any questions about the contents of this Disclosure Brochure, please contact the Advisor at (214) 220-8989 or at [info@roserockwealth.com](mailto:info@roserockwealth.com).

RoseRock is a registered investment advisor 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 advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about RoseRock to assist you in determining whether to retain the Advisor.

Additional information about RoseRock 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# 288088.

**RoseRock Wealth Management, LLC**  
**5950 Sherry Lane, Suite 201, Dallas, TX 75225**  
**Phone: (214) 220-8989**  
[www.roserockwealth.com](http://www.roserockwealth.com)

## Item 2 – Material Changes

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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 RoseRock. For convenience, the Advisor has combined these documents into a single disclosure document.

RoseRock 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. RoseRock 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 has amended its fees for wealth management services. Please see Items 5 and 7 for more information.

### Future Changes

From time to time, the Advisor may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations, or 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.

At any time, you may view the current Disclosure Brochure online 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# 288088. You may also request a copy of this Disclosure Brochure at any time by contacting the Advisor at (214) 220-8989 or at [info@roserockwealth.com](mailto:info@roserockwealth.com).

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## Item 4 – Advisory Services

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### A. Firm Information

RoseRock Wealth Management, LLC (“RoseRock” 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 Texas. RoseRock was founded in February 2017 and is owned and operated by Ryan W. Huey (President and Chief Compliance Officer). This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by RoseRock.

### B. Advisory Services Offered

RoseRock offers advisory services to individuals, high net worth individuals, trusts, estates, pensions and profit-sharing plans, and charitable organizations (each referred to as a “Client”).

The Advisor acts 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. RoseRock’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.

#### Wealth Management Services

RoseRock provides customized wealth management services to its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary and non-discretionary investment management and related advisory services.

*Investment Management Services* – RoseRock provides investment advisory solutions for its Clients based on model portfolios created by the Advisor. The Advisor primarily utilizes exchange traded funds (“ETFs”) and mutual funds to create proprietary model portfolios offered to its Clients. The Advisor may also utilize other investments to meet the model objectives. In certain cases, the Advisor may use margin to meet a Client’s goals or liquidity needs. RoseRock evaluates and selects investments for inclusion in model portfolios only after applying its internal due diligence process. The Advisor will work with the Client to identify their investment goals, objectives, and risk tolerance to construct a portfolio from the Advisor’s model portfolios. The Advisor may retain certain types of investments based on a Client’s legacy holdings, which will be maintained outside of the models. Additional information regarding the risks of these investment options, including margin, can be found in Item 8.

RoseRock’s investment approach 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. RoseRock 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.

RoseRock evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. RoseRock may recommend, on occasion, redistributing investment allocations to diversify the portfolio. RoseRock 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. RoseRock 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, generating cash to meet Client needs, or any risk deemed unacceptable for the Client’s risk tolerance.

At no time will RoseRock 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[s] at the Custodian, pursuant to the Client investment advisory agreement. For additional information. Please see Item 12 – Brokerage Practices.

*Participant Account Management-* As part of the Advisor's Investment Management Services, when appropriate, the Advisor will use a third party platform to facilitate management of held away assets such as defined contribution plan participant accounts, with discretion. The platform allows the Advisor to avoid being considered to have custody of Client funds since the Advisor does not have direct access to Client log-in credentials to affect trades. The Advisor is not affiliated with the platform in any way and do not receive compensation from them for using their platform. A link will be provided to the Client allowing them to connect an account(s) to the platform. Once Client account(s) is connected to the platform, the Advisor will review the current account allocations. When deemed necessary, the Advisor will rebalance the account considering client investment goals and risk tolerance, and changes in allocations will take into account current economic and market trends. The goal is to improve account performance over time, minimize loss during difficult markets, and manage internal fees that harm account performance. Client account(s) will be reviewed at least quarterly and allocation changes will be made as deemed necessary.

*Retirement Accounts –* When the Advisor provides investment advice to Clients regarding ERISA retirement accounts or individual retirement accounts ("IRAs"), the Advisor is a fiduciary within the meaning of Title I of the Employee Retirement Income Security Act ("ERISA") and/or the Internal Revenue Code ("IRC"), as applicable, which are laws governing retirement accounts. When deemed to be in the Client's best interest, the Advisor will provide investment advice to a Client regarding a distribution from an ERISA retirement account or to roll over the assets to an IRA 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). Such a recommendation creates a conflict of interest if the Advisor earns a new (or increases 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.

#### Financial Planning Services

RoseRock will typically provide a variety of financial planning services to Clients either as a component of its wealth management services or 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 may encompass one or more areas of need, including but not limited to investment planning, retirement planning, personal savings, education savings, and other areas of a Client's financial situation.

A financial plan developed for or rendered to the Client as part of or in addition to the Client's comprehensive wealth management services 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 education savings, and/or charitable giving programs.

RoseRock may also refer Clients to an accountant, attorney, or other specialists, as appropriate for their unique situation. RoseRock does not receive compensation for these referrals. For certain financial planning engagements, the Advisor will provide a written summary of the Client's financial situation, observations, and recommendations.

Financial planning recommendations made in connection with the Advisor's comprehensive wealth management services pose a conflict between the interests of the Advisor and the interests of the Client. For example, a recommendation to increase the level of investment assets with the Advisor would pose a conflict, as it would increase the fees paid to the Advisor. Clients are not obligated to implement any recommendations made by the Advisor.

#### Retirement Plan Advisory Services

RoseRock provides 3(21) non-discretionary retirement plan advisory services on behalf of the retirement plans (each referred to as a "Plan") and the company (the "Plan Sponsor"). The Advisor's retirement plan advisory services are designed to assist the Plan Sponsor in meeting its fiduciary obligations to the Plan. Each

engagement is customized to the needs of the Plan and Plan Sponsor. Retirement Plan Advisory Services include the following:

1. Design of Investment Policy Statement (IPS). The Advisor will assist the Plan in designing an IPS, which will act as the framework for the Plan's investment selection and monitoring process. These guidelines will be consistent with the regulations issued pursuant to ERISA § 404(c) dealing with participant-directed plans.
2. Investment Review and Recommendations. The Advisor will assist the Plan in the initial and ongoing monitoring and review of the Plan's investment options and recommended changes/additions when appropriate. The Investment Committee will have the ultimate decision whether or not a fund change, deletion, or addition should be implemented.
3. Fee Analysis. The Advisor will assist the investment committee or other responsible fiduciary in understanding the investment fees that are charged to the Plan and how those fees compare to the fees other similar investment vendors charge for similar services and products. The Advisor will also assist the Plan Sponsor, when necessary, in producing participant notifications regarding fees. The responsibility for ensuring that participants receive any such notification, however, will reside exclusively with the Plan sponsor and not with the Advisor.
4. Participant Education Consulting. The Advisor will consult with the Plan on the effectiveness of the employee education program. The Advisor will conduct and coordinate education consulting efforts with the Plan's current providers.
5. Fiduciary File. The Advisor will construct a Fiduciary File that will be used by the Plan to keep documentation related to the Plan. This documentation includes, but is not limited to, Investment Committee minutes, Investment Policy Statement, investment analysis, educational work, fee analysis, vendor analysis, 404(c) information notices (if applicable), and plan design/work analysis. The Plan assumes the responsibility of maintaining this file's contents, including ensuring its accuracy and completeness.

Certain of these services are provided by RoseRock serving in the capacity as a fiduciary under the Employee Retirement Income Security Act of 1974, as amended ("ERISA"). In accordance with ERISA Section 408(b)(2), the Plan Sponsor is provided with a written description of RoseRock's fiduciary status, the specific services to be rendered, and all direct and indirect compensation the Advisor reasonably expects under the engagement.

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

Prior to engaging RoseRock to provide wealth management services, each Client is required to enter into a wealth management agreement with the Advisor that defines the terms, conditions, authority, and responsibilities of the Advisor and the Client. These services may include:

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

### **D. Wrap Fee Programs**

RoseRock does not manage or place Client assets into a wrap fee program. Investment management services are provided directly by RoseRock.

## **E. Assets Under Management**

As of December 31, 2023, RoseRock manages \$170,500,000 in Client assets, of which \$163,600,000 are managed on a discretionary basis and \$6,900,000 on a non-discretionary basis. Clients may request more current information at any time by contacting the Advisor.

## **Item 5 – Fees and Compensation**

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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**

#### Wealth Management Services

Wealth management fees are paid quarterly at the end of each quarter, pursuant to the terms of the wealth management agreement. Wealth management fees are based on the average daily balance of assets under management during the quarter. Wealth management fees are based on the following schedule:

<b>Assets Under Management (\$)</b>	<b>Annual Rate (%)</b>
Under \$1,500,000	1.10%
\$1,500,000 to \$3,000,000	0.85%
\$3,000,001 to \$10,000,000	0.55%
Over \$10,000,000	0.30%

Fees may vary from the above fee schedule depending on the nature and complexity of each Client's circumstances or with the inclusion of financial planning or other services pursuant to the terms of the wealth management agreement. Additionally, the Advisor, at its discretion, may negotiate fees for certain Client accounts. RoseRock may impose a minimum annual account fee of \$11,000.00, which is negotiable at the discretion of the Advisor. An estimate for the total costs will be determined prior to establishing the advisory relationship.

Wealth management fees in the first quarter of service are 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 RoseRock will be independently valued by the Custodian. RoseRock will conduct periodic reviews of the Custodian's valuations.

The Advisor's fee is exclusive of, and in addition to, brokerage fees, transaction fees, and other related costs and expenses, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs.

#### Foundations Services

As part of Foundations services, the Advisor offers Clients with less than \$1,000,000 in assets under management, investment management and ongoing financial planning as separate services for an annual investment management fee of 1.10%, payable at the end of each quarter. The Advisor generally requires a minimum relationship size of \$250,000 and a minimum quarterly investment management fee of \$687.50.

#### Financial Planning Services

RoseRock offers ongoing financial planning services, which are included in its wealth management services for Clients with greater than \$1,000,000 in assets under management.

Ongoing standalone financial planning services are offered for an additional monthly fee for Clients with less than \$1,000,000 in assets under management. Additionally, for Clients with less than \$1,000,000 in assets under management, there is a one-time fee ranging from \$1,000 to \$3,000 for the preparation of the initial financial plan. This fee will vary depending on the nature and complexity of each Client's circumstances. An estimate for total costs will be determined prior to establishing the advisory relationship. Fees for ongoing financial planning services



are offered for a fixed monthly fee of \$150 per month. Financial planning fees are negotiable at the sole discretion of the Advisor.

#### Retirement Plan Advisory Services

Fees for pension/retirement plan advisory services are charged an annual asset-based fee of up to 0.75% and are billed at the end of the quarter, pursuant to the terms of the retirement plan advisory agreement. Retirement plan advisory fees are based on the average daily balance of assets supervised by the Advisor during the quarter. Fees may be negotiable depending on the size and complexity of the Plan.

Fees are generally based on the following schedule:

<b>Assets Under Management (\$)</b>	<b>Annual Rate (%)</b>
Under \$2,000,000	0.75%
\$2,000,000 to \$5,000,000	0.60%
\$5,000,001 and over	0.45%

Certain existing Clients may have fee schedules that differ from the schedule above.

### **B. Fee Billing**

#### Wealth Management Services

Wealth management 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 end of the respective quarter. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the average daily value of assets under management with RoseRock during the quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting the deduction of the wealth management fees. 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 wealth management fees to be deducted by RoseRock directly from their account[s] held by the Custodian as part of the wealth management agreement and separate account forms provided by the Custodian.

#### Retirement Plan Advisory Services

Retirement plan advisory fees are deducted from the assets of the Plan. The Plan and its participants will receive independent statements from the Custodian no less frequently than quarterly.

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

Clients may incur certain fees or charges imposed by third parties other than RoseRock, in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all custody and securities execution fees charged by the Custodian. The Advisor's recommended Custodian does not charge securities transaction fees for ETF and equity trades in Client accounts but typically charges for mutual funds and other types of investments. The fees charged by RoseRock are separate and distinct from these custody and execution fees.

In addition, all fees paid to RoseRock for wealth management services 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 RoseRock, but would not receive the services provided by RoseRock, 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 RoseRock 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**

### Wealth Management Services

RoseRock is compensated for its wealth management services at the end of the quarter after services are rendered. Either party may terminate the wealth management agreement, at any time, by providing advance written notice to the other party. The Client may also terminate 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 Client's wealth management agreement with the Advisor is non-transferable without the Client's prior consent.

### Retirement Plan Advisory Services

RoseRock is compensated for its retirement plan advisory services at the end of the quarter after services are rendered. Either party may terminate the retirement plan advisory agreement, at any time, by providing advance written notice to the other party. The Client may also terminate within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client shall be responsible for retirement plan advisory fees up to and including the effective date of termination. The Client's retirement plan services agreement with the Advisor is non-transferable without the Client's prior consent.

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

RoseRock does not buy or sell securities and does not receive any compensation for securities transactions in any Client account other than the advisory fees noted above.

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

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

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RoseRock offers advisory services to individuals, high net worth individuals, trusts, estates, pensions and profit-sharing plans, and charitable organizations. The amount of each type of Client is available on RoseRock's Form ADV Part 1A. These amounts may change over time and are updated at least annually by the Advisor.

RoseRock generally imposes a minimum annual fee of \$11,000 for wealth management Clients with over \$1,000,000 in assets under management and a minimum quarterly fee of \$687.50 for Clients with under \$1,000,000 in assets under management.

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

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

RoseRock primarily employs modern portfolio theory in developing investment strategies for its Clients. RoseRock also employs a fundamental analysis method in certain circumstances. Research and analysis from RoseRock 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.

*Modern portfolio theory* is a theory of investment that attempts to maximize portfolio expected return for a given amount of portfolio risk or equivalently minimize risk for a given level of expected return by carefully choosing the proportions of various assets. Modern portfolio theory generally assumes that Clients are risk-averse, which may result in lower returns on investments.

*Fundamental analysis* utilizes economic and business indicators as investment selection criteria. These criteria are generally ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment

with a value discounted by the market. 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 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.

As noted above, RoseRock generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. Strategic asset allocation with a structured asset class approach is the primary strategy utilized for Clients with long-term objectives. This means that RoseRock uses no-load or load-waived (i.e., no commissions for purchasing) mutual funds and ETFs that are globally diversified across a wide range of asset classes (e.g., equities, bonds, etc.) and investment styles. RoseRock recommends that Clients invest in no-load institutional mutual funds and ETFs advised by Dimensional Fund Advisors, L.P. ("DFA") and Stone Ridge Asset Management, LLC ("Stone Ridge"). DFA and Stone Ridge funds generally are available for investment only by clients of registered investment advisors, and all investments are subject to the approval of the advisor. This means that you may not be able to make additional investments in DFA or Stone Ridge funds if you terminate your agreement with RoseRock, except through another advisor authorized by DFA and Stone Ridge. Each Client executes a wealth management agreement with RoseRock that documents their objectives and their desired investment strategy.

RoseRock 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.

## **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. RoseRock 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 Clients 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 the 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. Portfolios are primarily constructed using individual stocks, bonds, mutual funds, and ETFs.

Investments in individual stocks have a risk of losing value in a relatively short amount of time and generally do not provide diversification to protect against market fluctuations. Investments in bonds involve the risk that the value of the bond may not keep pace with inflation. The performance of mutual funds and ETFs are subject to market risk, including the possible loss of principal. The value of the fund will fluctuate with the value of the underlying securities.

Following are some of the risks associated with components of the Advisor's investment approach:

**ETF Risk:** The performance of ETFs is subject to market risk, 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.

**Mutual Fund Risk:** The performance of mutual funds is subject to market risk, 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.

**Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.

**Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic, and social conditions may trigger market events.

**Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year because purchasing power is eroding at the rate of inflation.

**Margin Borrowings:** The use of short-term margin borrowings may result in certain additional risks to a Client. For example, if securities pledged to brokers to secure a Client's margin accounts decline in value, the Client could be subject to a "margin call" pursuant to which it must either deposit additional funds with the broker or be the subject of mandatory liquidation of the pledged securities to compensate for the decline in value.

**Past performance is not a guarantee of future returns. Investing in securities and other investments involves 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**

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**There are no legal, regulatory, or disciplinary events involving RoseRock or its owner.** RoseRock 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 Advisor 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# 288088.

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

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The sole business of RoseRock and Mr. Huey is to provide investment advisory services to its Clients. Neither RoseRock nor its Advisory Persons are involved in other business endeavors. RoseRock does not maintain any affiliations with other firms other than contracted service providers to assist with the servicing of its Client's accounts.

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

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

RoseRock has implemented a Code of Ethics (the "Code") that defines the Advisor's fiduciary commitment to each Client. This Code applies to all persons associated with RoseRock ("Supervised Persons"). The Code was developed to provide general ethical guidelines and specific instructions regarding the Advisor's duties to the Client. RoseRock and its Supervised Persons owe a duty of loyalty, fairness, and good faith towards each Client. It is the obligation of RoseRock's Supervised Persons 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. The Code is available to Clients and prospective Clients upon request. To request a copy of the Code, please contact the Advisor at (214) 220-8989 or at [info@roserockwealth.com](mailto:info@roserockwealth.com).

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

RoseRock allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. RoseRock 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. RoseRock does not have a material interest in any securities traded in Client accounts.

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

RoseRock allows Supervised Persons to purchase or sell 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, we must disclose to you and mitigate 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, Supervised Persons have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can 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 RoseRock by requiring reporting of personal securities trades by its Supervised Persons for review by the Chief Compliance Officer ("CCO") or delegate. 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 RoseRock allows Supervised Persons 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 RoseRock, or any Supervised Person of RoseRock, transact in any security to the detriment of any Client.**

### **Item 12 – Brokerage Practices**

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

RoseRock 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 RoseRock to direct trades to the Custodian as agreed upon in the investment advisory agreement. Further, RoseRock does not have the discretionary authority to negotiate commissions on behalf of Clients on a trade-by-trade basis.

Where RoseRock does not exercise discretion over the selection of the Custodian, it may recommend the Custodian to Clients for execution and custody 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 the Advisor. However, the Advisor may be limited in the services it can provide if the recommended Custodian is not engaged. RoseRock may recommend the Custodian based on criteria such as, but not limited to, the reasonableness of commissions charged to the Client, services made available to the Client, its reputation, and/or the location of the Custodian's offices.

RoseRock will generally recommend that Clients establish their account[s] at Charles Schwab & Co., Inc. ("Schwab"), a FINRA-registered broker-dealer and member SIPC. Schwab will serve as the Client's "qualified custodian." RoseRock maintains an institutional relationship with Schwab, whereby the Advisor receives economic benefits from Schwab. Please see Item 14 below.

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

**RoseRock Wealth Management, LLC**  
5950 Sherry Lane, Suite 201, Dallas, TX 75225  
Phone: (214) 220-8989  
[www.roserockwealth.com](http://www.roserockwealth.com)

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 the broker-dealer/custodian in exchange for research and other services. **RoseRock does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodian. However, the Advisor receives certain economic benefits from the Custodian. Please see Item 14 below.**
2. **Brokerage Referrals** – RoseRock 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 RoseRock will place trades within the established account[s] at the Custodian designated by the Client. Further, all Client accounts are traded within their respective account[s] at the Custodian. 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]). RoseRock 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. RoseRock will execute its transactions through the Custodian as authorized by the Client.

RoseRock may aggregate orders in a block trade or trades when securities are purchased or sold through the custodian for multiple (discretionary) accounts on 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**

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

Securities in Client accounts are monitored on a regular and continuous basis by Ryan W. Huey, President and CCO of RoseRock. 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 RoseRock 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. The Advisor will not prepare reports for Clients who receive financial planning, retirement planning, and/or pension consulting services.



## Item 14 – Client Referrals and Other Compensation

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### A. Compensation Received by RoseRock

RoseRock is a fee-only advisory firm that is compensated solely by its Clients and not from any investment product. RoseRock does not receive commissions or other compensation from product sponsors, broker-dealers, or any unrelated third party. RoseRock may refer Clients to various unaffiliated, non-advisory professionals (e.g., attorneys, accountants, estate planners) to provide certain financial services necessary to meet the goals of its Clients. Likewise, RoseRock may receive non-compensated referrals of new Clients from various third parties.

#### Participation in Institutional Advisor Platform

RoseRock has established an institutional relationship with Schwab through its “Schwab Advisor Services” unit, a division of Schwab dedicated to serving independent advisory firms like RoseRock. As a registered investment advisor participating on the Schwab Advisor Services platform, RoseRock receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at Schwab. Services provided by Schwab Advisor Services benefit the Advisor and many, but not all services provided by Schwab will benefit Clients. 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 a custodian creates a conflict of interest since these benefits may influence the Advisor’s recommendation of this custodian over one that does not furnish similar software, systems support, or services. *Services that Benefit the Client* – Schwab’s institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of Client’s funds and securities. Through Schwab, the Advisor may be able to access certain investments and asset classes that the Client would not be able to obtain directly or through other sources. Further, the Advisor may be able to invest in certain mutual funds and other investments without having to adhere to investment minimums that might be required if the Client were to directly access the investments.

*Services that May Indirectly Benefit the Client* – Schwab provides participating advisors with access to technology, research, discounts, and other services. In addition, the Advisor receives duplicate statements for Client accounts the ability to deduct advisory fees, trading tools, and back-office support services as part of its relationship with Schwab. These services are intended to assist the Advisor in effectively managing accounts for its Clients but may not directly benefit all Clients.

*Services that May Only Benefit the Advisor* – Schwab also offers other services to RoseRock that may not benefit the Client, including educational conferences and events, consulting services, and discounts for various service providers. Access to these services creates a financial incentive for the Advisor to recommend Schwab, which results in a conflict of interest. RoseRock believes, however, that the selection of Schwab as Custodian is in the best interests of its Clients.

### B. Compensation for Client Referrals

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

## Item 15 – Custody

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RoseRock 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 RoseRock to utilize that Custodian for the Client’s security transactions. Clients should review statements provided by the Custodian and compare them to any reports provided by RoseRock to ensure accuracy, as the Custodian does not perform this review. For more information about custodians and brokerage practices, see Item 12 - Brokerage Practices.

If the Client gives the Advisor authority to move money from one account to another account, the Advisor may have custody of those assets. In order to avoid additional regulatory requirements, the Custodian and the Advisor have adopted safeguards to ensure that the money movements are completed in accordance with the Client’s instructions.

## **Item 16 – Investment Discretion**

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RoseRock 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 RoseRock. Discretionary authority will only be granted upon Client authorization. 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 RoseRock will be in accordance with each Client's investment objectives and goals.

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

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RoseRock 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**

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



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

## **for**

**Ryan W. Huey, CFP®**  
**President and Chief Compliance Officer**

**Effective: April 29, 2024**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Ryan W. Huey, CFP®, (CRD# 4509766) in addition to the information contained in the RoseRock Wealth Management, LLC (“RoseRock” or the “Advisor,” CRD# 288088) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the RoseRock Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (214) 220-8989 or by email at [info@roserockwealth.com](mailto:info@roserockwealth.com).

Additional information about Mr. Huey is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or individual CRD# 4509766.

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5950 Sherry Lane, Suite 201, Dallas, TX 75225  
Phone: (214) 220-8989  
[www.roserockwealth.com](http://www.roserockwealth.com)

## Item 2 – Educational Background and Business Experience

Ryan W. Huey, CFP®, born in 1976, is dedicated to advising Clients of RoseRock as the President and Chief Compliance Officer of RoseRock. Mr. Huey earned a Bachelor of Arts degree in Finance and Accounting from Abilene Christian University in Texas. Additional information regarding Mr. Huey's employment history is included below.

### Employment History:

President and Chief Compliance Officer, RoseRock Wealth Management, LLC	2/2017 to Present
Registered Representative, Perryman Securities, Inc.	4/2002 to 5/2017
Investment Advisor Representative, Perryman Financial Advisory, Inc.	6/1999 to 5/2017

### CERTIFIED FINANCIAL PLANNER™ (“CFP®”)

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 92,000 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). The 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 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 the 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 thirty (30) hours of continuing education hours every two (2) years, including two (2) 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 the CFP® Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

### Item 3 – Disciplinary Information

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***There are no legal, civil, or disciplinary events to disclose regarding Mr. Huey.*** Mr. Huey 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. Huey.

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. Huey.***

However, the Advisor encourages you to independently view the background of Mr. Huey on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or individual CRD# 4509766.

### Item 4 – Other Business Activities

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Mr. Huey is dedicated to the investment advisory activities of RoseRock's Clients. Mr. Huey does not have any other business activities for which compensation is received.

### Item 5 – Additional Compensation

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Mr. Huey is dedicated to the investment advisory activities of RoseRock's Clients. Mr. Huey does not receive any additional forms of compensation.

### Item 6 – Supervision

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Mr. Huey serves as the President and Chief Compliance Officer of RoseRock. Mr. Huey can be reached at (214) 220-8989 or by email at [info@roserockwealth.com](mailto:info@roserockwealth.com).

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

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

## **for**

**Franklin L. Matute, CFP®**  
**Investment Advisor Representative**

**Effective: April 29, 2024**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Franklin L. Matute, CFP®, (CRD# 5147408) in addition to the information contained in the RoseRock Wealth Management, LLC (“RoseRock” or the “Advisor,” CRD# 288088) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the RoseRock Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (214) 220-8989 or by email at [info@roserockwealth.com](mailto:info@roserockwealth.com).

Additional information about Mr. Matute is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or individual CRD# 5147408.

**RoseRock Wealth Management, LLC**  
5950 Sherry Lane, Suite 201, Dallas, TX 75225  
Phone: (214) 220-8989  
[www.roserockwealth.com](http://www.roserockwealth.com)

## Item 2 – Educational Background and Business Experience

Franklin L. Matute, CFP®, born in 1984, is dedicated to advising Clients of RoseRock as an Investment Advisor Representative. Mr. Matute earned a Bachelor of Science degree in Personal Financial Planning from Texas Tech University in 2007. Mr. Matute also attained the CERTIFIED FINANCIAL PLANNER™ certification in 2014. Additional information regarding Mr. Matute's employment history is included below.

### Employment History:

Investment Advisor Representative, RoseRock Wealth Management, LLC	09/2018 to Present
Financial Advisor, Lee Financial Company, LLC	02/2016 to 09/2018
Associate Financial Advisor, Halcyon Global Advisors, LLC	04/2014 to 12/2015
Associate Financial Advisor, Caviness Wealth Management	04/2014 to 12/2015
Administrative Assistant, LPL Financial, LLC	04/2014 to 12/2015
Associate Financial Advisor, CfFO4Life	10/2007 to 03/2014

### CERTIFIED FINANCIAL PLANNER™ ("CFP®")

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 92,000 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). The 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 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 the 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 thirty (30) hours of continuing education hours every two (2) years, including two (2) 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 the CFP® Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

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

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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. ***There are no legal, civil, or disciplinary events requiring disclosure regarding Mr. Matute.***

However, the Advisor encourages you to independently view the background of Mr. Matute on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or individual CRD# 5147408.

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

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Mr. Matute is dedicated to the investment advisory activities of RoseRock's Clients. Mr. Matute does not have any other business activities.

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

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Mr. Matute is dedicated to the investment advisory activities of RoseRock's Clients. Mr. Matute does not receive any additional forms of compensation.

### **Item 6 – Supervision**

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Mr. Matute serves as an Investment Advisor Representative of RoseRock and is supervised by Ryan Huey, the Chief Compliance Officer. Ryan Huey can be reached at (214) 220-8989.

RoseRock has implemented a Code of Ethics, an internal compliance document, that guides each Supervised Person in meeting their fiduciary obligations to Clients of RoseRock. Further, RoseRock is subject to regulatory oversight by various agencies. These agencies require registration by RoseRock and its Supervised Persons. As a registered entity, RoseRock is subject to examinations by regulators, which may be announced or unannounced. RoseRock 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: April 29, 2024

Our Commitment to You

RoseRock Wealth Management, LLC (“RoseRock” 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. RoseRock (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.

RoseRock 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?

Driver’s license number	Date of birth
Social security or taxpayer identification number	Assets and liabilities
Name, address, and phone number[s]	Income and expenses
Email 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 Clients’ 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> RoseRock 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 RoseRock 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> RoseRock 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 (214) 220-8989 or at [info@roserockwealth.com](mailto:info@roserockwealth.com).