

## Item 1 – Cover Page

### **B.A. Schrock Wealth Management, Inc.**

131 College Street  
Wadsworth, Ohio 44281  
330-473-1060  
[www.baschrock-fg.com](http://www.baschrock-fg.com)

Date of Disclosure Brochure: March 2024

---

This disclosure brochure provides information about the qualifications and business practices of B.A. Schrock Wealth Management, Inc. (also referred to as we, us and B.A. Schrock Wealth Management throughout this disclosure brochure). If you have any questions about the contents of this disclosure brochure, please contact Benjamin A. Schrock at 330-473-1060 or [ben@baschrock-fg.com](mailto:ben@baschrock-fg.com). The information in this disclosure brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about B.A. Schrock Wealth Management is also available on the Internet at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can view our firm's information on this website by searching for B.A. Schrock Wealth Management, Inc. or our firm's CRD number 304694.

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

## **Item 2 – Material Changes**

Since the last disclosure brochure dated March 2023, the following material change has been made to this brochure:

- In April 2023 the firm was approved as a registered investment advisor with the U.S. Securities and Exchange commission.
- In September 2023 Charles Schwab and Co. completed their purchase of TD Ameritrade. Item 12 has been updated to reflect the fact that Charles Schwab and Co. is now the qualified custodian for our client's managed accounts.

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

### Item 3 – Table of Contents

Item 1 – Cover Page .....	1
Item 2 – Material Changes .....	2
Item 3 – Table of Contents .....	3
Item 4 – Advisory Business .....	4
Description of Advisory Services .....	4
Limits Advice to Certain Types of Investments .....	7
Participation in Wrap Fee Programs .....	7
Tailor Advisory Services to Individual Needs of Clients .....	9
Client Assets Managed by B.A. Schrock Wealth Management .....	9
Item 5 – Fees and Compensation .....	9
Fees for Investment Advisory Services .....	9
Third-Party Money Managers .....	11
Seminars .....	11
Item 6 – Performance-Based Fees and Side-By-Side Management .....	11
Item 7 – Types of Clients .....	12
Minimum Investment Amounts Required .....	12
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss .....	12
Methods of Analysis .....	12
Investment Strategies .....	14
Primarily Recommend One Type of Security .....	15
Risk of Loss .....	15
Item 9 – Disciplinary Information .....	16
Item 10 – Other Financial Industry Activities and Affiliations .....	16
Third-Party Money Managers .....	16
Affiliated Insurance Agency .....	17
Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading .....	17
Code of Ethics Summary .....	17
Affiliate and Employee Personal Securities Transactions Disclosure .....	17
Item 12 – Brokerage Practices .....	18
Brokerage Recommendations .....	19
Directed Brokerage .....	20
Soft Dollar Benefits .....	20
Block Trading Policy .....	20
Agency Cross Transactions .....	21
Item 13 – Review of Accounts .....	21
Account Reviews and Reviewers .....	21
Statements and Reports .....	21
Item 14 – Client Referrals and Other Compensation .....	22
Item 15 – Custody .....	22
Item 16 – Investment Discretion .....	23
Item 17 – Voting Client Securities .....	24
Item 18 – Financial Information .....	24
Customer Privacy Policy Notice .....	24
Business Continuity Plan .....	25

#### **Item 4 – Advisory Business**

B.A. Schrock Wealth Management is an investment adviser with the U.S. Securities and Exchange Commission and is a corporation formed under the laws of the State of Ohio.

- Benjamin A. Schrock is the Managing Member and 100% owner of B.A. Schrock Wealth Management. Full details of the education and business background of Benjamin A. Schrock are provided at *Item 19* of this Disclosure Brochure.
- B.A. Schrock Wealth Management was approved as an investment adviser in October 2019.

#### **Description of Advisory Services**

B.A. Schrock offers comprehensive investment advisory services that combines our Asset management Service and our Financial Planning Services in to one comprehensive program.

Please understand that a written agreement, which details the exact terms of the service, must be signed by you and B.A. Schrock Wealth Management before we can provide you the services described below.

We will provide you with a copy of our Form ADV Part 2A Disclosure Brochure and of the Form ADV Part 2B Brochure Supplement. If the appropriate disclosure statement was not delivered to you at least 48 hours prior to the client entering into any written or oral advisory contract with this investment adviser, then you have the right to terminate the contract without penalty within five business days after entering into the contract.

**Asset Management Services** – B.A. Schrock Wealth Management offers asset management services, which involves B.A. Schrock Wealth Management providing you with continuous and ongoing supervision over your specified accounts.

You must appoint our firm as your investment adviser of record on specified accounts (collectively, the “Account”). The Account consists only of separate account(s) held by qualified custodian(s) under your name. The qualified custodians maintain physical custody of all funds and securities of the Account, and you retain all rights of ownership (e.g., right to withdraw securities or cash, exercise or delegate proxy voting and receive transaction confirmations) of the Account.

The Account is managed by us based on your financial situation, investment objectives and risk tolerance. We actively monitor the Account and provide advice regarding buying, selling, reinvesting or holding securities, cash or other investments of the Account.

We will need to obtain certain information from you to determine your financial situation and investment objectives. You will be responsible for notifying us of any updates regarding your financial situation, risk tolerance or investment objective and whether you wish to impose or modify existing investment restrictions; however, we will contact you at least annually to discuss any changes or updates regarding your financial situation, risk tolerance or investment objectives. We are always reasonably available to consult with you relative to the status of your Account. You have the ability to impose reasonable

restrictions on the management of your accounts, including the ability to instruct us not to purchase certain securities.

It is important that you understand that we manage investments for other clients and may give them advice or take actions for them or for our personal accounts that is different from the advice we provide to you or actions taken for you. We are not obligated to buy, sell or recommend to you any security or other investment that we may buy, sell or recommend for any other clients or for our own accounts.

Conflicts could arise in the allocation of investment opportunities among accounts that we manage. We strive to allocate investment opportunities believed to be appropriate for your account(s) and other accounts advised by our firm among such accounts equitably and consistent with the best interests of all accounts involved. However, there can be no assurance that a particular investment opportunity that comes to our attention will be allocated in any particular manner. If we obtain material, non-public information about a security or its issuer that we may not lawfully use or disclose, we have absolutely no obligation to disclose the information to any client or use it for any client's benefit.

B.A. Schrock Wealth Management offers two optional platforms in providing asset management services to clients:

1. The B.A. Schrock Wealth Management asset management program – in this program the investment advisor representatives of the firm will provide individualized asset management services to their client accounts using Charles Schwab and Co. as the custodian for the client assets. The firm is responsible for performing investment research and making investment decisions that are in the best interest of our clients.
2. B.A. Schrock Wealth Management also participates in the Model Market Center platform offered by Charles Schwab and Co. Under this program your investment advisor representative will place the client assets in a Model Portfolio that best fits the client's investment objectives and risk tolerances which has been designed by money managers that are not affiliated with Charles Schwab and Co. Under this program the Model Market Center platform will provide us with trade signals based upon current market conditions. Upon receipt of the trade signal B.A. Schrock Wealth Management will decide whether to accept or decline the information and place transactions accordingly.

**Financial Planning Services** – For our Asset Management clients B.A. Schrock Wealth Management also offers financial planning services, which involve preparing a written financial plan covering specific or multiple topics. These services are only available to clients that also contract with B.A. Schrock Wealth Management for our asset management services. When providing financial planning services, the role of your investment adviser representative is to find ways to help you understand your overall financial situation and help you set financial objectives. We provide modular written financial plans which only cover those specific areas of concern mutually agreed upon by you and us. A modular written financial plan is limited or segmented and does not involve the creation of a full written financial plan. You should be aware that there are important issues that may not be taken into consideration when your investment adviser representative develops his or her analysis and recommendations under a modular written financial plan. Written financial plans prepared by us do not include specific recommendations of individual securities.

Our financial planning services do not involve implementing any transaction on your behalf or the active and ongoing monitoring or management of your investments or accounts. You have the sole responsibility for determining whether to implement our financial planning recommendations. To the extent that you would like to implement any of our investment recommendations through B.A. Schrock Wealth Management or retain B.A. Schrock Wealth Management to actively monitor and manage your investments, you must execute a separate written agreement with B.A. Schrock Wealth Management for our asset management services.

**Referral of Third-Party Money Managers** - B.A. Schrock Wealth Management offers advisory services by referring clients to a third-party money manager offering asset management and other investment advisory services. The third-party managers are responsible for continuously monitoring client accounts and making trades in client accounts when necessary. As a result of the referral, we are paid a portion of the fee charged and collected by the third-party money managers in the form of solicitor fees. Each solicitation arrangement is performed pursuant to a written solicitation agreement and is in compliance with SEC Rule 206(4)-3 and applicable state securities rules and regulations. Prior to introducing any client to another investment adviser, B.A. Schrock Wealth Management will be responsible in determining if the third-party manager is properly registered, notice filed, or exempt from registration with the state securities regulatory authority of the client's resident state.

Under this program, we assist you with identifying your risk tolerance and investment objectives. We recommend third-party money managers in relation to your stated investment objectives and risk tolerance, and you may select a recommended third-party money manager or model portfolio based upon your needs. You must enter into an agreement directly with the third-party money manager who provides your designated account with asset management services.

We are available to answer questions that you may have regarding your account and act as the communication conduit between you and the third-party money manager. The third-party money manager may take discretionary authority to determine the securities to be purchased and sold for your account. We do not have any trading authority with respect to your designated account managed by the third-party money manager.

Although we review the performance of numerous third-party investment adviser firms, we enter into only a select number of relationships with third-party investment adviser firms that have agreed to pay us a portion of the overall fee charged to our clients. Therefore, B.A. Schrock Wealth Management has a conflict of interest in that it will only recommend third-party investment advisors that will agree to compensate us for referrals of our clients.

Clients are advised that there may be other third-party managed programs not recommended by our firm, that are suitable for the client and that may be more or less costly than arrangements recommended by our firm. No guarantees can be made that a client's financial goals or objectives will be achieved by a third-party investment adviser recommended by our firm. Further, no guarantees of performance can ever be offered by our firm *(Please refer to Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss for more details.)*

## **Seminars**

B.A. Schrock Wealth Management may occasionally provide seminars in areas such as financial planning, retirement planning, estate planning, college planning and charitable planning. Seminars are always offered on an impersonal basis and do not focus on the individual needs of participants.

## **Limits Advice to Certain Types of Investments**

B.A. Schrock Wealth Management provides investment advice on the following types of investments:

- Mutual Funds
- Exchange Traded Funds (ETFs)
- Exchange-listed Securities
- Securities Traded Over-the-Counter
- Corporate Debt Securities
- Certificates of Deposit
- Municipal Securities
- Variable Annuities
- Variable Life Insurance
- US Government Securities
- Interests in Partnerships Investing in Real Estate

Although we generally provide advice only on the products previously listed, we reserve the right to offer advice on any investment product that may be suitable for each client's specific circumstances, needs, goals and objectives.

It is not our typical investment strategy to attempt to time the market, but we may increase cash holdings modestly as deemed appropriate based on your risk tolerance and our expectations of market behavior. We may modify our investment strategy to accommodate special situations such as low basis stock, stock options, legacy holdings, inheritances, closely held businesses, collectibles, or special tax situations.

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

## **Participation in Wrap Fee Programs**

B.A. Schrock Wealth Management offer asset management services exclusively through a wrap fee program. A wrap fee program is defined as any advisory program under which a specified fee or fees not based directly upon transactions in a client's account is charged for investment advisory services (which may include portfolio management or advice concerning the selection of other investment advisers) and the execution of client transactions. Whenever a fee is charged to a client for services described in this brochure we will receive all or a portion of the fee charged.

**Retirement Plan Rollover Recommendations** - When B.A. Schrock Wealth Management provides investment advice about your retirement plan account or individual retirement account ("IRA") including whether to maintain investments and/or proceeds in the retirement plan account, roll over such

investment/proceeds from the retirement plan account to a IRA or make a distribution from the retirement plan account, we acknowledge that B.A. Schrock Wealth Management 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. The way B.A. Schrock Wealth Management makes money creates conflicts with your interests so B.A. Schrock Wealth Management operates under a special rule that requires B.A. Schrock Wealth Management to act in your best interest and not put our interest ahead of you.

Under this special rule’s provisions, B.A. Schrock Wealth Management must as a fiduciary to a retirement plan account or IRA under ERISA/IRC:

- Meet a professional standard of care when making investment recommendations (e.g., give prudent advice);
- Never put the financial interests of B.A. Schrock Wealth Management ahead of you when making recommendations (e.g., give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that B.A. Schrock Wealth Management gives advice that is in your best interest;
- Charge no more than is reasonable for the services of B.A. Schrock Wealth Management; and
- Give Client basic information about conflicts of interest.

To the extent We recommend you roll over your account from a current retirement plan account to an individual retirement account managed by B.A. Schrock Wealth Management, please know that B.A. Schrock Wealth Management and our investment adviser representatives] have a conflict of interest.

We can earn increased investment advisory fees by recommending that you roll over your account at the retirement plan to an IRA managed by B.A. Schrock Wealth Management. We will earn fewer investment advisory fees if you do not roll over the funds in the retirement plan to an IRA managed by B.A. Schrock Wealth Management.

Thus, our investment adviser representatives have an economic incentive to recommend a rollover of funds from a retirement plan to an IRA which is a conflict of interest because our recommendation that you open an IRA account to be managed by our firm can be based on our economic incentive and not based exclusively on whether or not moving the IRA to our management program is in your overall best interest.

We have taken steps to manage this conflict of interest. We have adopted an impartial conduct standard whereby our investment adviser representatives will (i) provide investment advice to a retirement plan participant regarding a rollover of funds from the retirement plan in accordance with the fiduciary status described below, (ii) not recommend investments which result in B.A. Schrock Wealth Management receiving unreasonable compensation related to the rollover of funds from the retirement plan to an IRA, and (iii) fully disclose compensation received by B.A. Schrock Wealth Management and our supervised persons and any material conflicts of interest related to recommending the rollover of funds from the retirement plan to an IRA and refrain from making any materially misleading statements regarding such rollover.



When providing advice to you regarding a retirement plan account or IRA, our investment advisor representatives will act with the care, skill, prudence, and diligence under the circumstances then prevailing that a prudent person acting in a like capacity and familiar with such matters would use in the conduct of an enterprise of a like character and with like aims, based on the investment objectives, risk, tolerance, financial circumstances, and a client's needs, without regard to the financial or other interests of B.A. Schrock Wealth Management or our affiliated personnel.

#### **Tailor Advisory Services to Individual Needs of Clients**

B.A. Schrock Wealth Management's advisory services are always provided based on your individual needs. This means, for example, that when we provide asset management services, you are given the ability to impose restrictions on the accounts we manage for you, including specific investment selections and sectors. We work with you on a one-on-one basis through interviews and questionnaires to determine your investment objectives and suitability information. Our financial planning services are always provided based on your individual needs. When providing financial planning services, we work with you on a one-on-one basis through interviews and questionnaires to determine your investment objectives and suitability information.

We will not enter into an investment adviser relationship with a prospective client whose investment objectives may be considered incompatible with our investment philosophy or strategies or where the prospective client seeks to impose unduly restrictive investment guidelines.

#### **Client Assets Managed by B.A. Schrock Wealth Management**

As of December 31, 2023, B.A. Schrock Wealth Management has \$162,062,198.00 in assets under management. All assets are managed on a discretionary basis.

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

In addition to the information provided in *Item 4 – Advisory Business*, this section provides additional details regarding our firm's services along with descriptions of each service's fees and compensation arrangements. It should be noted that lower fees for comparable service may be available from other sources. The exact fees and other terms will be outlined in the agreement between you and B.A. Schrock Wealth Management.

#### **Fees for Investment Advisory Services**

Fees charged for our comprehensive Asset Management Services are charged based on a percentage of assets under management, billed in arrears (at the end of the billing period) on a monthly calendar basis and calculated based on the fair market value of your account as of the last business day of the current billing period. Both asset management options are billed under the same asset based fee schedule. Fees are prorated (based on the number of days service is provided during the initial billing period) for your account opened at any time other than the beginning of the billing period. If asset management services are commenced in the middle of the billing period, then the prorated fee for that billing period will be billed in arrears at the end of that billing period.

The Asset Management Services continue in effect until terminated by either party (i.e., B.A. Schrock Wealth Management or you) by providing written notice of termination to the other party. When fees are billed in arrears, B.A. Schrock Wealth Management will prorate the final fee payment based on the number of days services are provided during the final period. The amount of client assets on the termination date will be used to determine the final fee payment.

Fees charged for our Asset Management Services are negotiable based on the type of client, the complexity of the client's situation, the composition of the client's account (i.e., equities versus mutual funds), the potential for additional account deposits, the relationship of the client with the investment adviser representative, and the total amount of assets under management for the client.

For my asset management services, clients will be charged an annual fee based upon the amount of assets under management. Each asset tier shall be assessed a fee percentage in accordance with the schedule shown below.

<b>Assets Under Management</b>	<b>Maximum Fee</b>
<b>\$0-\$500,000</b>	<b>1.80%</b>
<b>\$500,001-\$1,000,000</b>	<b>1.50%</b>
<b>\$1,000,001 and Above</b>	<b>1.0%</b>

B.A. Schrock Wealth Management believes that its annual fee is reasonable in relation to: (1) services provided and (2) the fees charged by other investment advisers offering similar services/programs. However, our annual investment advisory fee may be higher than that charged by other investment advisers offering similar services/programs. In addition to our compensation, you may also incur charges imposed at the mutual fund level (e.g., advisory fees and other fund expenses).

The investment advisory fees will be deducted from your account and paid directly to our firm by the qualified custodian(s) of your account. You will authorize the qualified custodian(s) of your account to deduct fees from your account and pay such fees directly to our firm. Our firm will send you a billing statement prior to time that fee deduction instruction is sent to the qualified custodian(s) of your account. The billing statement will detail the formula used to calculate the fee, the assets under management and the time period covered. See *Item 15 – Custody* for more details.

You should review your account statements received from the qualified custodian(s) and verify that appropriate investment advisory fees are being deducted. The qualified custodian(s) will not verify the accuracy of the investment advisory fees deducted.

You may incur certain charges imposed by third parties other than B.A. Schrock Wealth Management in connection with investments made through your account including, but not limited to, mutual fund sales loads, 12(b)-1 fees and surrender charges, IRA and qualified retirement plan fees. Management fees charged by B.A. Schrock Wealth Management are separate and distinct from the fees and expenses charged by investment company securities that may be recommended to you. A description of these fees and expenses are available in each investment company security's prospectus.

To the extent B.A. Schrock Wealth Management engages an outside professional (i.e. attorney, independent investment adviser or accountant) while providing financial planning services to you, B.A. Schrock Wealth Management will be responsible for the payment of the fees for the services of such an outside professional, and you will not be required to reimburse B.A. Schrock Wealth Management for such payments. To the extent that you personally engage such an outside professional, you will be responsible for the payment of the fees for the services of such an outside professional, and B.A. Schrock Wealth Management will not be required to reimburse Client for such payments. Fees for the services of an outside professional (i.e. attorney, independent investment adviser or accountant) will be in addition to and separate from the fees charged by B.A. Schrock Wealth Management, and you will be responsible for the payment of the fees for the services of such an outside professional. In no event will the services of an outside professional be engaged without your express approval.

It should be noted that lower fees for comparable services may be available from other sources.

### **Third-Party Money Managers**

Third-party managers generally have fee schedules and account minimum requirements that will vary among third-party money managers. Fees for asset management services provided by Third-Party Managers will range up to a maximum of 2.5%. The management fee charged includes the management fee charged by B.A. Schrock and the management fee charged by the Third-Party Money Manager chosen to manage your assets. The actual fee charged to you will vary depending on the third-party money manager. All fees are calculated and collected by the third-party money manager who will be responsible for delivering our portion of the fee paid by you to us. Account minimums are generally higher on fixed income accounts than for equity-based accounts. A complete description of the third-party money manager's services, fee schedules and account minimums will be disclosed in the third-party money manager's client agreement and disclosure brochure which will be provided to you prior to or at the time an agreement for services is executed and the account is established.

Under this program, you could incur additional charges including but not limited to, mutual fund sales loads, 12b-1 fees and surrender charges, and IRA and qualified retirement plan fees.

We have a conflict of interest by only offering those third-party money managers that have agreed to pay a portion of their advisory fee to us and have met the conditions of our due diligence review. There may be other third-party money managers that may be suitable for you that may be more or less costly. No guarantees can be made that your financial goals or objectives will be achieved. Further, no guarantees of performance can be offered.

### **Seminars**

No separate fees are charged for attending seminars presented by the firm.

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

Performance-based fees are defined as fees based on a share of capital gains on or capital appreciation of the assets held in a client's account. *Item 6* is not applicable to this Disclosure Brochure because we do not charge or accept performance-based fees.

## **Item 7 – Types of Clients**

B.A. Schrock Wealth Management generally provides investment advice to the following types of clients:

- Individuals
- High net worth individuals
- Trusts, estates, or charitable organizations
- Corporations or business entities other than those listed above

You are required to execute a written agreement with B.A. Schrock Wealth Management specifying the particular advisory services in order to establish a client arrangement with B.A. Schrock Wealth Management.

### **Minimum Investment Amounts Required**

There are no minimum investment amounts or conditions required for establishing an account managed by B.A. Schrock Wealth Management. However, all clients are required to execute an agreement for services in order to establish a client arrangement with B.A. Schrock Wealth Management and/or the third-party money manager or the sponsor of third-party money manager platforms.

Third-party money managers may have minimum account and minimum fee requirements in order to participate in their programs. Each-third party money manager will disclose its minimum account size and fees in its Form ADV Part 2A Disclosure Brochure.

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

### **Methods of Analysis**

B.A. Schrock Wealth Management uses the following methods of analysis in formulating investment advice:

Cyclical – This method analyzes the investments sensitive to business cycles and whose performance is strongly tied to the overall economy. For example, cyclical companies tend to make products or provide services that are in lower demand during downturns in the economy and in higher demand during upswings. Examples include the automobile, steel, and housing industries. The stock price of a cyclical company will often rise just before an economic upturn begins and fall just before a downturn begins. Investors in cyclical stocks try to make the largest gains by buying the stock at the bottom of a business cycle, just before a turnaround begins.

While most economists and investors agree that there are cycles in the economy that need to be respected, the duration of such cycles is generally unknown. An investment decision to buy at the bottom of a business cycle may actually turn out to be a trade that occurs before or after the bottom of the cycle. If done before the bottom, then downside price action can result prior to any gains. If done after the bottom, then some upside price action may be missed. Similarly, a sell

decision meant to occur at the top of a cycle may result in missed opportunity or unrealized losses.

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

The risk associated with fundamental analysis is that it is somewhat subjective. While a quantitative approach is possible, fundamental analysis usually entails a qualitative assessment of how market forces interact with one another in their impact on the investment in question. It is possible for those market forces to point in different directions, thus necessitating an interpretation of which forces will be dominant. This interpretation may be wrong and could therefore lead to an unfavorable investment decision.

Technical – This is a method of evaluating securities by analyzing statistics generated by market activity, such as past prices and volume. Technical analysts do not attempt to measure a security's intrinsic value, but instead use charts and other tools to identify patterns that can suggest future activity. Technical analysts believe that the historical performance of stocks and markets are indications of future performance.

Technical analysis is even more subjective than fundamental analysis in that it relies on proper interpretation of a given security's price and trading volume data. A decision might be made based on a historical move in a certain direction that was accompanied by heavy volume; however, that heavy volume may only be heavy relative to past volume for the security in question, but not compared to the future trading volume. Therefore, there is the risk of a trading decision being made incorrectly, since future trading volume is an unknown. Technical analysis is also done through observation of various market sentiment readings, many of which are quantitative. Market sentiment gauges the relative degree of bullishness and bearishness in a given security, and a contrarian investor utilizes such sentiment advantageously. When most traders are bullish, then there are very few traders left in a position to buy the security in question, so it becomes advantageous to sell it ahead of the crowd. When most traders are bearish, then there are very few traders left in a position to sell the security in question, so it becomes advantageous to buy it ahead of the crowd. The risk in utilization of such sentiment technical measures is that a very bullish reading can always become more bullish, resulting in lost opportunity if the money manager chooses to act upon the bullish signal by selling out of a position. The reverse is also true in that a bearish reading of sentiment can always become more bearish, which may result in a premature purchase of a security.

There are risks involved in using any analysis method.

To conduct analysis, B.A. Schrock Wealth Management gathers information from financial newspapers and magazines, inspection of corporate activities, research materials prepared by others, corporate rating services, timing services, annual reports, prospectuses and filings with the SEC, and company press releases.

### **Investment Strategies**

B.A. Schrock Wealth Management uses the following investment strategies when managing client assets and/or providing investment advice:

Long term purchases. Investments held at least a year.

Short term purchases. Investments sold within a year.

Value Investing. We also follow a value-investing strategy that attempts to acquire at reasonable valuations publicly traded businesses that can deliver sustainable excess returns. We focus on a long-only strategy. Long term strategies are designed to identify and select investments to be held for multiple years. We will also invest in value oriented special situations with shorter expected holding periods.

Value Investing can be described as a strategy of selecting stocks that trade for less than their intrinsic values. Value investors typically seek stocks of companies that they believe the market has undervalued. They believe the market overreacts to good and bad news, resulting in stock price movements that do not correspond with the company's long-term fundamentals. The result is an opportunity for value investors to profit by buying when the price is deflated. Often, value investors select stocks with lower-than-average price-to-book or price-to-earnings ratios and/or high dividend yields. The risks associated with value-investing include incorrectly analyzing and overestimating the intrinsic value of a business, concentration risk, under performance relative to major benchmarks, macro-economic risks, investing in value traps i.e. businesses that remain perpetually undervalued, and lost purchasing power on cash holdings in the case of inflation.

Tactical asset allocation. Allows for a range of percentages in each asset class (such as Stocks = 40-50%). The ranges establish minimum and maximum acceptable percentages that permit the investor to take advantage of market conditions within these parameters. Thus, a minor form of market timing is possible, since the investor can move to the higher end of the range when stocks are expected to do better and to the lower end when the economic outlook is bleak.

Strategic asset allocation. Calls for setting target allocations and then periodically rebalancing the portfolio back to those targets as investment returns skew the original asset allocation percentages. The concept is akin to a "buy and hold" strategy, rather than an active trading approach. Of course, the strategic asset allocation targets may change over time as the client's goals and needs change and as the time horizon for major events such as retirement and college funding grow shorter.

The investment strategies utilized by any Third-Party Managers utilized to manage your assets will vary dependent upon the firm selected. Please refer to the Third-Party Manager's ADV Part 2 Disclosure Brochure for more information.

### **Primarily Recommend One Type of Security**

We do not primarily recommend one type of security to clients. Instead, we recommend any product that may be suitable for each client relative to that client's specific circumstances and needs.

### **Risk of Loss**

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

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

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

- Options Risk. Options on securities may be subject to greater fluctuations in value than an investment in the underlying securities. Purchasing and writing put and call options are highly specialized activities and entail greater than ordinary investment risks.
- ETF and Mutual Fund Risk – When investing in an ETF or mutual fund, you will bear additional expenses based on your pro rata share of the ETF's or mutual fund's operating expenses, including the potential duplication of management fees. The risk of owning an ETF or mutual fund generally reflects the risks of owning the underlying securities the ETF or mutual fund holds. You will also incur brokerage costs when purchasing ETFs.
- Management Risk – Your investment with our firm varies with the success and failure of our investment strategies, research, analysis and determination of portfolio securities. If our investment strategies do not produce the expected returns, the value of the investment will decrease.

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

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

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

B.A. Schrock Wealth Management is **not** and does **not** have a related person that is a broker/dealer, municipal securities dealer, government securities dealer or broker, an investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund), another investment adviser or financial planner, a futures commission merchant, commodity pool operator, or commodity trading advisor, a banking or thrift institution, an accountant or accounting firm, a lawyer or law firm, a pension consultant, a real estate broker or dealer, and a sponsor or syndicator of limited partnerships.

We are an independent registered investment adviser and only provide investment advisory services. We are not engaged in any other business activities and offer no other services except those described in this Disclosure Brochure. However, while we do not sell products or services other than investment advice, our representatives may sell other products or provide services outside of their role as investment adviser representatives with us.

#### **Third-Party Money Managers**

B.A. Schrock Wealth Management has developed several programs, previously described in *Item 5* of this disclosure brochure, designed to allow us to recommend and select third-party money managers for you. Once you select the third-party money manager to manage all or a portion of your assets, the third-party money manager will pay us a portion of the fees you are charged. Please refer to *Items 4 and 5* for full details regarding the programs, fees, conflicts of interest and materials arrangements when B.A. Schrock Wealth Management selects other investment advisers.



### **Affiliated Insurance Agency**

The company's managing Member and owner Benjamin A. Schrock is also the owner of B.A. Schrock Financial Group an Ohio licensed insurance agency.

Through this agency you may work with your investment adviser representative in his or her separate capacity as an insurance agent. When acting in his or her separate capacity as an insurance agent, the investment adviser representative may sell, for commissions, general disability insurance, life insurance, annuities, and other insurance products to you. As such, your investment adviser representative in his or her separate capacity as an insurance agent, may suggest that you implement recommendations of B.A. Schrock Wealth Management by purchasing disability insurance, life insurance, annuities, or other insurance products. This receipt of commissions creates an incentive for the representative to recommend those products for which your investment adviser representative will receive a commission in his or her separate capacity as an insurance agent. Consequently, the advice rendered to you could be biased. You are under no obligation to implement any insurance or annuity transaction through your investment adviser representative.

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

### **Code of Ethics Summary**

An investment adviser is considered a fiduciary and has a fiduciary duty to all clients. B.A. Schrock Wealth Management has established a Code of Ethics to comply with the requirements of the securities laws and regulations that reflects its fiduciary obligations and those of its supervised persons. The Code of Ethics also requires compliance with federal securities laws. B.A. Schrock Wealth Management's Code of Ethics covers all individuals that are classified as "supervised persons". All employees, officers, directors and investment adviser representatives are classified as supervised persons. B.A. Schrock Wealth Management requires its supervised persons to consistently act in your best interest in all advisory activities. B.A. Schrock Wealth Management imposes certain requirements on its affiliates and supervised persons to ensure that they meet the firm's fiduciary responsibilities to you. The standard of conduct required is higher than ordinarily required and encountered in commercial business.

This section is intended to provide a summary description of the Code of Ethics of B.A. Schrock Wealth Management. If you wish to review the Code of Ethics in its entirety, you should send us a written request and upon receipt of your request, we will promptly provide a copy of the Code of Ethics to you.

### **Affiliate and Employee Personal Securities Transactions Disclosure**

B.A. Schrock Wealth Management or associated persons of the firm buy and sell for their personal accounts, investment products identical to those recommended to clients. This creates a conflict of interest. It is the express policy of B.A. Schrock Wealth Management that all persons associated in any manner with our firm must place clients' interests ahead of their own when implementing personal investments. As is required by our internal procedures manual, B.A. Schrock Wealth Management and its associated persons will not buy or sell securities for their personal account(s) where their decision is

derived, in whole or in part, by information obtained as a result of employment or association with our firm unless the information is also available to the investing public upon reasonable inquiry.

We are now and will continue to be in compliance with applicable state and federal rules and regulations. To mitigate conflicts of interest that can occur when access persons manage their personal accounts at the same time B.A. Schrock Wealth Management manages client accounts, we have developed written supervisory procedures that include personal investment and trading policies for our representatives, employees and their immediate family members (collectively, associated persons):

- Associated persons cannot prefer their own interests to that of the client.
- Associated persons cannot purchase or sell any security for their personal accounts prior to implementing transactions for client accounts.
- Associated persons cannot buy or sell securities for their personal accounts when those decisions are based on information obtained as a result of their employment, unless that information is also available to the investing public upon reasonable inquiry.
- Associated persons are prohibited from purchasing or selling securities of companies in which any client is deemed an "insider".
- Associated persons are discouraged from conducting frequent personal trading.
- Associated persons are generally prohibited from serving as board members of publicly traded companies unless an exception has been granted to the Chief Compliance Officer of B.A. Schrock Wealth Management.

Any associated person not observing our policies is subject to sanctions up to and including termination.

## **Item 12 – Brokerage Practices**

If B.A. Schrock Wealth Management assists in the implementation of any recommendations, we are responsible to ensure that the client receives the best execution possible. Best execution does not necessarily mean that clients receive the lowest possible commission costs but that the qualitative execution is best. In other words, all conditions considered, the transaction execution is in your best interest. When considering best execution, we look at a number of factors besides prices and rates including, but not limited to:

- Execution capabilities (e.g., market expertise, ease/reliability/timeliness of execution, responsiveness, integration with our existing systems, ease of monitoring investments)
- Products and services offered (e.g., investment programs, back office services, technology, regulatory compliance assistance, research and analytic services)
- Financial strength, stability and responsibility
- Reputation and integrity
- Ability to maintain confidentiality

We exercise reasonable due diligence to make certain that best execution is obtained for all clients when implementing any transaction by considering the back-office services, technology and pricing of services offered.

### **Brokerage Recommendations**

B.A. Schrock Wealth Management actively recommends, and in some cases requires, that clients establish brokerage accounts with the Schwab Institutional division of Charles Schwab & Company, Inc. ("Schwab"), a FINRA-registered broker-dealer, Member SIPC, to maintain custody of clients' assets and to effect trades for their accounts.

Although B.A. Schrock Wealth Management recommends clients establish accounts at Schwab, it is the client's decision to custody assets with Schwab. B.A. Schrock Wealth Management is independently owned and operated and not affiliated with Schwab. B.A. Schrock Wealth Management can recommend additional unaffiliated broker-dealers to affect fixed income transactions.

Schwab provides B.A. Schrock Wealth Management with access to its institutional trading and custody services, which are typically not available to Schwab retail investors. These services generally are available to independent investment advisors on an unsolicited basis, at no charge to them so long as a total of at least \$10 million of the advisor's clients' assets are maintained at Schwab Institutional. These services are not contingent upon B.A. Schrock Wealth Management committing to Schwab any specific amount of business (assets in custody or trading commissions). Schwab's brokerage services include the execution of securities transactions, custody, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require significantly higher minimum initial investment.

Schwab Institutional also makes available to B.A. Schrock Wealth Management other products and services that benefit B.A. Schrock Wealth Management but may not directly benefit clients' accounts. Many of these products and services can be used to service all or some substantial number of B.A. Schrock Wealth Management's accounts, including accounts not maintained Schwab.

Schwab's products and services that assist B.A. Schrock Wealth Management in managing and administering clients' accounts include software and other technology that (i) provides access to client account data (such as trade confirmations and account statements); (ii) facilitate trade execution and allocate aggregated trade orders for multiple client accounts; (iii) provide research, pricing and other market data; (iv) facilitate payment of B.A. Schrock Wealth Management's fees from some of its accounts; and (v) assist with back-office functions, recordkeeping and client reporting.

Schwab Institutional also offers other services intended to help B.A. Schrock Wealth Management manage and further develop its business enterprise. These services include: (i) compliance, legal and business consulting; (ii) publications and conferences on practice management and business succession; and (iii) access to employee benefits providers, human capital consultants and insurance providers. Schwab Institutional will discount or waive fees it would otherwise charge for some of these services or pay all or part of the fees of a third-party providing these services to B.A. Schrock Wealth Management. Schwab Institutional will also provide other benefits such as educational events or occasional business entertainment of B.A. Schrock Wealth Management personnel. While as a fiduciary, B.A. Schrock Wealth Management endeavors to act in its clients' best interests, B.A. Schrock Wealth Management's recommendation that clients maintain their assets in accounts at Schwab will take into account availability of some of the foregoing products and services and other arrangements not solely on

the nature of cost or quality of custody and brokerage services provided by Schwab, which creates a conflict of interest.

You are under no obligation to act on the financial planning recommendations of B.A. Schrock Wealth Management. If we assist you in the implementation of any recommendations, we are responsible to ensure that you receive the best execution possible.

The custodian and brokerage practices utilized by any Third-Party Managers utilized to manage your assets will vary dependent upon the firm selected. Please refer to the Third-Party Manager's ADV Part 2 Disclosure Brochure for more information.

### **Directed Brokerage**

Clients should understand that not all investment advisors require the use of a particular broker/dealer or custodian. Some investment advisors allow their clients to select whichever broker/dealer the client decides. By requiring clients to use a particular broker/dealer, B.A. Schrock Wealth Management may not achieve the most favorable execution of client transactions and the practice requiring the use of specific broker/dealers may cost clients more money than if the client used a different broker/dealer or custodian. However, for compliance and operational efficiencies, B.A. Schrock Wealth Management has decided to require my clients to use broker/dealers and other qualified custodians determined by the firm.

### **Soft Dollar Benefits**

An investment adviser receives soft dollar benefits from a broker-dealer when the investment adviser receives research or other products and services in exchange for client securities transactions or maintaining an account balance with the broker-dealer.

B.A. Schrock Wealth Management does not have a soft dollar agreement with a broker-dealer or a third-party.

### **Block Trading Policy**

We may elect to purchase or sell the same securities for several clients at approximately the same time. This process is referred to as aggregating orders, batch trading or block trading and is used by our firm when B.A. Schrock Wealth Management believes such action may prove advantageous to clients. If and when we aggregate client orders, allocating securities among client accounts is done on a fair and equitable basis. Typically, the process of aggregating client orders is done in order to achieve better execution, to negotiate more favorable commission rates or to allocate orders among clients on a more equitable basis in order to avoid differences in prices and transaction fees or other transaction costs that might be obtained when orders are placed independently.

B.A. Schrock Wealth Management uses the average price allocation method for transaction allocation.

Under this procedure B.A. Schrock Wealth Management will calculate the average price for each transaction included in a block order and assign the average price and transaction charge to each allocated transaction executed for the client's account.

If and when we determine to aggregate client orders for the purchase or sale of securities, including securities in which B.A. Schrock Wealth Management or our associated persons may invest, we will do so in accordance with the parameters set forth in the SEC No-Action Letter, *SMC Capital, Inc.* Neither we nor our associated persons receive any additional compensation as a result of block trades.

### **Agency Cross Transactions**

Our associated persons are prohibited from engaging in agency cross transactions, meaning we cannot act as brokers for both the sale and purchase of a single security between two different clients and cannot receive compensation in the form of an agency cross commission or principal mark-up for the trades.

## **Item 13 – Review of Accounts**

### **Account Reviews and Reviewers**

Managed accounts are reviewed at least quarterly. While the calendar is the main triggering factor, reviews can also be conducted at your request. Account reviews will include investment strategy and objectives review and making a change if strategy and objectives have changed. Reviews are conducted by the investment adviser representative assigned to the client account, with reviews performed in accordance with your investment goals and objectives.

Accounts established and maintained with other third-party money managers are reviewed at least quarterly, usually when statements and/or reports are received from the money manager.

Our financial planning services terminate upon the presentation of the written plan. Our financial planning services do not include monitoring the investments of your account(s), and therefore, there is no ongoing review of your account(s) under such services.

### **Statements and Reports**

For our asset management services, you are provided with transaction confirmation notices and regular quarterly account statements in writing directly from the qualified custodian.

Whether reports by an outside money manager are provided to you will depend upon the outside money manager.

Financial planning clients do not receive any report other than the written plan originally contracted for and provided by B.A. Schrock Wealth Management.

You are encouraged to always compare any reports or statements provided by us or third-party money manager against the account statements delivered from the qualified custodian. When you have questions about your account statement, you should contact our firm and the qualified custodian preparing the statement.

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

B.A. Schrock Wealth Management does not directly or indirectly compensate any person for client referrals.

The only compensation received from advisory services is the fees charged for providing investment advisory services as described in *Item 5* of this Disclosure Brochure. B.A. Schrock Wealth Management receives no other forms of compensation in connection with providing investment advice.

B.A. Schrock Wealth Management does not directly or indirectly compensate anybody for client referrals.

However, as disclosed under *Item 12* above, B.A. Schrock Wealth Management participates in TD Ameritrade's institutional customer program and Adviser may recommend Charles Schwab and Co. to Clients for custody and brokerage services. There is no direct link between B.A. Schrock Wealth Management's participation in the program and the investment advice it gives to its clients, although we receive economic benefits that are typically not available to Charles Schwab and Co. retail investors through our participation in the program. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving our participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to B.A. Schrock Wealth Management by third-party vendors. Charles Schwab and Co. may also have paid for business consulting and professional services received by our related persons. Some of the products and services made available by Charles Schwab and Co. through the program may benefit B.A. Schrock Wealth Management but may not benefit your accounts. These products or services may assist B.A. Schrock Wealth Management in managing and administering Client accounts, including accounts not maintained at Charles Schwab and Co. Other services made available by Charles Schwab and Co. are intended to help B.A. Schrock Wealth Management manage and further develop its business enterprise. The benefits received by B.A. Schrock Wealth Management or our personnel through participation in the program do not depend on the amount of brokerage transactions directed to Charles Schwab and Co. As part of its fiduciary duties to clients, we endeavor at all times to put clients' interests first. You should be aware, however, that the receipt of economic benefits by B.A. Schrock Wealth Management or our related persons in and of itself creates a conflict of interest and may indirectly influence B.A. Schrock Wealth Management's choice of Charles Schwab and Co. for custody and brokerage services.

*Please see Item 5, Fees and Compensation, Item 10, Other Financial Industry Activities and Affiliations and Item 12, Brokerage Practices, for additional discussion concerning other compensation.*

## **Item 15 – Custody**

Custody, as it applies to investment advisors, has been defined by regulators as having access or control over client funds and/or securities. In other words, custody is not limited to physically holding client funds

and securities. If an investment adviser has the ability to access or control client funds or securities, the investment adviser is deemed to have custody and must ensure proper procedures are implemented.

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

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

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

### **Item 16 – Investment Discretion**

When providing asset management services, B.A. Schrock Wealth Management maintains trading authorization over your Account and can provide management services on a **discretionary** basis. When discretionary authority is granted, we will have the authority to determine the type of securities and the amount of securities that can be bought or sold for your portfolio without obtaining your consent for each transaction.

If you decide to grant trading authorization on a **non-discretionary** basis, we will be required to contact you prior to implementing changes in your account. Therefore, you will be contacted and required to accept or reject our investment recommendations including:

- The security being recommended
- The number of shares or units
- Whether to buy or sell

Once the above factors are agreed upon, we will be responsible for making decisions regarding the timing of buying or selling an investment and the price at which the investment is bought or sold. If your accounts are managed on a non-discretionary basis, you need to know that if we are not able to reach you or you are slow to respond to our request, it can have an adverse impact on the timing of trade implementations and we may not achieve the optimal trading price.

You will have the ability to place reasonable restrictions on the types of investments that may be purchased in your Account. You may also place reasonable limitations on the discretionary power granted to B.A. Schrock Wealth Management so long as the limitations are specifically set forth or included as an attachment to the client agreement.

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

Clients are given the option to vote proxies themselves or have B.A. Schrock Wealth Management vote proxies on their behalf.

With respect to assets managed by a third-party money manager, we will not vote the proxies associated with these assets. You will need to refer to each third-party money manager's disclosure brochure to determine whether the third-party money manager will vote proxies on your behalf. You may request a complete copy of third-party money manager's proxy voting policies and procedures as well as information on how your proxies were voted by contacting the third-party money manager or by contacting B.A. Schrock Wealth Management at the address or phone number indicated on Page 1 of this disclosure document.

### **Item 18 – Financial Information**

This *Item 18* is not applicable to this brochure. B.A. Schrock Wealth Management does not require or solicit prepayment of more than \$500 in fees per client, six months or more in advance. Therefore, we are not required to include a balance sheet for the most recent fiscal year. We are not subject to a financial condition that is reasonably likely to impair our ability to meet contractual commitments to clients. Finally, B.A. Schrock Wealth Management has not been the subject of a bankruptcy petition at any time.

### **Customer Privacy Policy Notice**

In November of 1999, Congress enacted the Gramm-Leach-Bliley Act (GLBA). The GLBA requires certain financial institutions, such as investment advisor firms, to protect the privacy of customer information. In situations where a financial institution does disclose customer information to non-affiliated third parties, other than permitted or required by law, customers must be given the opportunity to opt out or prevent such disclosure. B.A. Schrock Wealth Management. does not share or disclose customer information to non-affiliated third parties except as permitted or required by law.

B.A. Schrock Wealth Management. is committed to safeguarding the confidential information of its clients. B.A. Schrock Wealth Management. holds all personal information provided by clients in the strictest confidence and it is the objective of B.A. Schrock Wealth Management. to protect the privacy of all clients. Except as permitted or required by law, B.A. Schrock Wealth Management. does not share confidential information about clients with non-affiliated parties. In the event that there were to be a change in this policy, B.A. Schrock Wealth Management. will provide clients with written notice and clients will be provided an opportunity to direct B.A. Schrock Wealth Management. as to whether such disclosure is permissible.



To conduct regular business, B.A. Schrock Wealth Management. may collect personal information from sources such as:

- Information reported by the client on applications or other forms the client provides to B.A. Schrock Wealth Management.
- Information about the client's transactions implemented by B.A. Schrock Wealth Management. or others
- Information developed as part of financial plans, analyses or investment advisory services

To administer, manage, service and provide related services for client accounts, it is necessary for B.A. Schrock Wealth Management. to provide access to customer information within the firm and to non-affiliated companies with whom B.A. Schrock Wealth Management. has entered into agreements. To provide the utmost service, B.A. Schrock Wealth Management. may disclose the information below regarding customers and former customers, as necessary, to companies to perform certain services on B.A. Schrock Wealth Management's' behalf.

- Information B.A. Schrock Wealth Management. receives from the client on applications (name, Social Security number, address, assets, etc.)
- Information about the client's transactions with B.A. Schrock Wealth Management. or others (account information, payment history, parties to transactions, etc.)
- Information concerning investment advisory account transactions
- Information about a client's financial products and services transaction with B.A. Schrock Wealth Management.

Since B.A. Schrock Wealth Management. shares non-public information solely to service client accounts, B.A. Schrock Wealth Management. does not disclose any non-public personal information about B.A. Schrock Wealth Management. customers or former customers to anyone, except as permitted by law. However, B.A. Schrock Wealth Management. may also provide customer information outside of the firm as required by law, such as to government entities, consumer reporting agencies or other third parties in response to subpoenas. In the event that B.A. Schrock Wealth Management. has a change to its customer privacy policy that would allow it to disclose non-public information not covered under applicable law, B.A. Schrock Wealth Management. will allow its clients the opportunity to opt out of such disclosure.

### **Business Continuity Plan**

B.A. Schrock Wealth Management has a business continuity and contingency plan in place designed to respond to significant business disruptions. These disruptions can be both internal and external. Internal disruptions will impact our ability to communicate and do business, such as a fire in the office building. External disruptions will prevent the operation of the securities markets or the operations of a number of firms, such as earthquakes, wildfires, hurricanes, terrorist attack or other wide-scale, regional disruptions.

Our continuity and contingency plan has been developed to safeguard employees' lives and firm property, to allow a method of making financial and operational assessments, to quickly recover and resume business operations, to protect books and records, and to allow clients to continue transacting business.

The plan includes the following:

- Alternate locations to conduct business;
- Hard and electronic back-ups of records;
- Alternative means of communications with employees, clients, critical business constituents and regulators; and
- Details on the firms' employee succession plan

Our business continuity and contingency plan is reviewed and updated on a regular basis to ensure that the policies in place are sufficient and operational.