



**Form ADV Part 2A Brochure
December 10, 2014**

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This Brochure provides information about the qualifications and business practices of Romans 1 Advisors LLC (Romans 1). If you have any questions about the contents of this Brochure, please contact us at 614-440-3180 or steve@romans1financial.com. Currently, our Brochure may be requested free of charge by contacting Steven D. Cox, Principal, at 614-440-3180 steve@romans1financial.com.

The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Romans 1 is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser. Additional information about Romans 1 also is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 - Material Changes

Romans 1 initial registration was made on December 10, 2014. There have been no material changes made to the brochure since then.

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Item 4 - Advisory Business

Romans 1 is owned in its entirety by Steven D. Cox and has been providing advisory services since December 10, 2014. Romans 1 specializes primarily in providing advisory services on non-publicly traded investments such as investments related to real estate.

As of December 10, 2014, Romans 1 managed \$0 on a discretionary basis and \$0 on a nondiscretionary basis. Romans 1 expects to manage up to \$5,000,000 on a nondiscretionary basis during its first year of existence.

Item 5 - Fees and Compensation

All fees are subject to negotiation.

The specific manner in which fees are charged by Romans 1 is established in a client's written agreement with Romans 1. Romans 1 will generally bill its fees on a quarterly basis. Clients may elect to be billed in advance or arrears each calendar quarter. Clients may also elect to be billed directly for fees or to authorize Romans 1 to directly debit fees from client accounts. Management fees shall be prorated for each capital contribution and withdrawal made during the applicable calendar quarter (with the exception of de minimis contributions and withdrawals). Accounts initiated or terminated during a calendar quarter will be charged a prorated fee. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable. The client has the right to terminate an agreement without penalty within five business days after entering into the agreement.

Romans 1's fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, third party investment and other third parties such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to Romans 1's fee, and Romans 1 shall not receive any portion of these commissions, fees, and costs.

Item 12 further describes the factors that Romans 1 considers in selecting or recommending broker-dealers for *client* transactions and determining the reasonableness of their compensation (*e.g.*, commissions).

The fee schedule applicable as of this Brochure is as follows:

Client Assets	Annual Fee (%) for all assets
On the first \$100,000	1.50% to 3.00%
On the next \$400,000	1.35% to 2.75%
On the next \$500,000	1.00% to 2.50%
On all amounts in excess of \$1,000,000	1.00% to 2.25%

For clients who request Romans 1 to research, review, and analyze investments that are specific to their requirements, Romans 1 may incur expenses associated with such research and review, and will be reimbursed at cost to Romans 1. These expenses may include the cost of obtaining research material, travel costs associated with meeting investment specialists, and other actual costs. Romans 1 shall make reasonable effort to notify the client in advance and receive consent prior to incurring such expenses, provided such expenses are greater than \$200 if known in advance.

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

Romans 1 does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

Item 7 - Types of Clients

Romans 1 provides portfolio management services to individuals, high net worth individuals, and for the retirement accounts of such individuals.

Romans 1 generally requires a minimum account of \$25,000 to open a portfolio in cash or securities.

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

Investing in securities involves risk of loss that clients should be prepared to bear. All investments whether in securities or non-securities is subject to risk. The degree of risk has many factors, some of which include the inherent risk of the investment, the education and investment background of the client as it pertains to the investment, the changes in rules and regulations, environmental changes, and changes in commerce and economics at the micro and macro levels. Risk inherent to an investment may also change over time and does not always mean a reduction in risk. Romans 1 in its attempt to research investments and provide risk analysis does so not only at the investment level, but also at a client specific portfolio level, based on all the information that is currently available to Romans 1.

8.1 Method of Analysis

Romans 1 uses the following primary methods of analysis but does not restrict itself to these methods of analysis. No one analysis is deemed better than the other, or the sole decision making factor, and Romans 1 may make use of one or more of these analysis methods at both the investment asset level as well as the portfolio level.

Charting

Use of charting historical data for various asset classes, individual assets, and various other data points, with data made available from various data sources, allows Romans 1 to analyze patterns of information as it pertains to investment assets.

Fundamental

Use of fundamental information of various investment assets, including but not limited to balance sheets, public records, corporate disclosures, etc, allows Romans 1 to analyze the details of the on-going operations of the investment assets.

Technical

Using technical mathematical indicators and pattern matching indicators based on fundamental mathematics allows Romans 1 to analyze trend patterns associated with specific investment assets or group of investment assets, including certain correlation patterns.

Cyclical

Macro-economic, socio-economic conditions affect asset classes and may follow various cyclical patterns of cash-flow, investment sectors, and economic trends on both an investment class and an individual portfolio. Romans 1 analyzes these cyclical trends on a regular basis as it applies.

8.2 Investment Strategies

Romans 1 uses the following general strategies which are fine-tuned to specific clients portfolios. All investment strategies have risk and costs associated with them, which varies based on investment assets as well as client portfolios.

Long-term Investments

Typically, Romans 1 seeks to provide long-term investment recommendations which are providing consistent return on investment, either through growth, income, or both. The change in strategy per client portfolio may depend on client requirements and/or market volatility conditions. Long-term investments are generally defined as investments held for twelve months or more.

Intermediate-term Investments

Romans 1 will recommend intermediate-term investments typically during volatile market conditions or when investors seek a return on investment that is not long-term. Such investment recommendations are based on client requirements. Intermediate-term investments are generally defined as investments held for more than 30 days but less than twelve months.

Short-term Investments

Romans 1 will recommend short-term investments typically during volatile market conditions or when investors seek a short-term return on investment. Such investment recommendations are based on client requirements. The general requirement of such a strategy is to preserve the principal or the gains of a client portfolio. Short-term investments are generally defined as investments held for one day or more up to 30 days.

Short Sales

Romans 1 as a general policy does not conduct short-selling of investment assets. While this may be activated on clients accounts by the client, Romans 1 will only work with clients who are extremely experienced with short selling of investment assets and only on a case-by-case basis.

Margin Transactions and Use of Leverage

Romans 1 generally does not use or recommend margin or leverage during the management of client portfolios. Client accounts may have the availability of margin as provided by the broker-dealer, with approval from the client. Clients should be aware, while typically there is no use of margin without client discussion, purchase of options could be viewed as using leverage without actually using margin account capability. Certain investment assets may use leverage within the asset. Neither Romans 1 nor the client typically has control on the use of leverage within the asset. In cases where the investment asset leverage is controllable directly by the client, Romans 1 will use leverage only if so acceptable to the client upon discussion with Romans 1.

Options

Romans 1 will use options trading in its investment recommendations. Options trading is limited to writing cash-covered puts, writing of asset-covered calls, buying calls and puts, buying covered spreads and selling asset-covered spreads. Romans 1 does not support any uncovered writing of put or call options.

Client strategies may consists of other strategies not documented here that are specific to the client's needs and only done in discussions and coordination with the client. These are typically initiated by the client and are not applicable to other clients.

Item 9 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Romans 1 or the integrity of Romans 1's management. Romans 1 has no information applicable to this item.

Item 10 – Other Financial Industry Activities and Affiliations

Romans 1 has common ownership with Romans 1 Financial LLC, and accounting and tax preparation firm, and Romans 1 Insurance LLC, an insurance agency licensed in Ohio. Clients of Romans 1 may also purchase products and services from these two entities.

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

Romans 1 has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. Persons employed at or affiliated with Romans 1 who are supervised must acknowledge the terms of the Code of Ethics annually, or as amended.

Romans 1 anticipates that, in appropriate circumstances, consistent with clients' investment objectives, it will cause accounts over which Romans 1 has management authority to effect, and will recommend to investment advisory clients or prospective clients, the purchase or sale of securities in which Romans 1, its affiliates and/or clients, directly or indirectly, have a position of interest. Romans 1's employees and persons associated with Romans 1 are required to follow Romans 1's Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors and employees of Romans 1 and its affiliates may trade for their own accounts in securities which are recommended to and/or purchased for Romans 1's clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of Romans 1 will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code certain classes of securities have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of Romans 1's clients. In addition, the Code requires pre-clearance of many transactions, and restricts trading in close proximity to client trading activity. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market

activity by a client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics, and to reasonably prevent conflicts of interest between Romans 1 and its clients.

Certain affiliated accounts may trade in the same securities with client accounts on an aggregated basis when consistent with Romans 1's obligation of best execution. In such circumstances, the affiliated and client accounts will share commission costs equally and receive securities at a total average price. Romans 1 will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. Completed orders will be allocated as specified in the initial trade order. Partially filled orders will be allocated on a pro rata basis. Any exceptions will be explained on the Order.

Romans 1's clients or prospective clients may request a copy of the firm's Code of Ethics by contacting Steven D. Cox at the contact information given on page one of this brochure.

It is Romans 1's policy that the firm will not affect any principal or agency cross securities transactions for client accounts. Romans 1 will also not cross trades between client accounts. Principal transactions are generally defined as transactions where an adviser, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to any advisory client. A principal transaction may also be deemed to have occurred if a security is crossed between an affiliated hedge fund and another client account. An agency cross transaction is defined as a transaction where a person acts as an investment adviser in relation to a transaction in which the investment adviser, or any person controlled by or under common control with the investment adviser, acts as broker for both the advisory client and for another person on the other side of the transaction. Agency cross transactions may arise where an adviser is dually registered as a broker-dealer or has an affiliated broker-dealer.

Item 12 – Brokerage Practices

Soft dollar benefits are not proportionately allocated to any accounts that may generate different amounts of the soft dollar benefits. Romans 1 does not currently have any soft dollar arrangements with clients.

Item 13 – Review of Accounts

Client accounts are typically reviewed on a quarterly basis but at least annually. Review consists of confirming transactions for accuracy as well as confirmation of accurate ending balances. Other client information, such as a change of address, are also checked for accuracy. These reports are provided in writing to the client. Custodian reports may suffice as meeting the needs of the client.

Item 14 – Client Referrals and Other Compensation

Romans 1 does not provide any compensation or economic gain for client referrals. Gifts may be given clients if such gift is appropriate within the Code of Ethics and does not exceed \$100 per person per calendar year.

Item 15 – Custody

Clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. Romans 1 urges the client to carefully review such statements and compare such official custodial records to the account statements that we may provide to you. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Romans 1 does not have custody of client funds or securities.

Item 16 – Investment Discretion

Romans 1 usually receives discretionary or non-discretionary authority from the client at the outset of an advisory relationship to select the identity and amount of securities to be

bought or sold. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account.

When selecting securities and determining amounts, Romans 1 observes the investment policies, limitations and restrictions of the clients for which it advises. For registered investment companies, Romans 1's authority to trade securities may also be limited by certain federal securities and tax laws that require diversification of investments and favor the holding of investments once made.

Investment guidelines and restrictions must be provided to Romans 1 in writing.

Romans 1 currently provides only non-discretionary advisory services.

Item 17 – Voting Client Securities

As a matter of firm policy and practice, Romans 1 does not have any authority to and does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. Romans 1 may provide advice to clients regarding the clients' voting of proxies.

Item 18 – Financial Information

Registered investment advisers are required in this item to provide the client with certain financial information or disclosures about Romans 1's financial condition. Romans 1 has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.