



Rollins Financial, Inc.

Item 1 – Cover Page

Rollins Financial, Inc.

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This Brochure provides information about the qualifications and business practices of Rollins Financial, Inc. If you have any questions about the contents of this Brochure, please contact us at 404-892-7967 or at contact@rollinsfinancial.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.

Rollins Financial 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 Rollins Financial also is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Material Changes

Rollins Financial's brochure has not changed materially since our last annual update on March 15, 2020.

We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, our Brochure may be requested by contacting Eddie Wilcox at 404-892-7967 or ewilcox@rollinsfinancial.com.

Additional information about Rollins Financial, Inc. is also available via the SEC's web site www.adviserinfo.sec.gov. The SEC's web site also provides information about any persons affiliated with Rollins Financial, Inc. who are registered, or are required to be registered, as

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Item 4 – Advisory Business

Rollins Financial, Inc. seeks to provide investment advice that will meet individual client goals under a fee only system, taking the utmost care to enhance each client's financial position over the long term. Rollins Financial, Inc. is principally owned by Joseph R. Rollins and was founded in 1990.

The applicant firm, Rollins Financial, Inc. (hereinafter, "RF"), provides individual investment counseling and supervisory services, along with commentaries on market performance and estimates for future trends. RF initially meets with each client to determine the client's financial objectives and other relevant factors that should be considered in building the investment portfolio. Taking the information gleaned from the initial meeting, and after further study of the client's overall circumstances, RF will: analyze existing assets, including allocation among asset classes; develop an asset allocation plan for each client portfolio; and select equity and/or fixed income securities designated to assist the client in reaching his or her stated goals and objectives. Clients can instruct RF to follow client directed investment restrictions or guidelines.

RF most often invests client assets in various mutual funds or exchange-traded funds. If a given situation warrants, RF may invest client funds in individual domestic or foreign common stocks, domestic and foreign government bonds, corporate bonds, preferred stocks, municipal bonds, commercial paper, certificates of deposit, variable annuities, or real estate limited partnerships. Once the portfolio is constructed, RF monitors the investments, their performance and overall progress toward the stated goals of the client on an ongoing basis.

As of December 31, 2020, RF manages total discretionary assets of \$953,823,751.

Item 5 – Fees and Compensation

These services provided by RF are billed on a percentage basis, determined by the following tiered annual fee schedule:

<u>Assets</u>	<u>Rate</u>
First \$50,000 (\$0 - \$50,000)	1.50%
Next \$50,000 (\$50,001 - \$100,000)	1.25%
Next \$900,000 (\$100,001 - \$1,000,000)	1.00%
Next \$2,000,000 (\$1,000,001 - \$3,000,000)	0.75%
over \$3,000,000	0.50%

A minimum portfolio size and minimum annual fees may apply, at the discretion of RF. However, under certain circumstances, portfolio size minimums and fees are potentially negotiable.

The specific manner in which fees are charged by RF is established in a client's written agreement with RF. RF will generally bill its fees on a quarterly basis in arrears each calendar quarter. Clients may also elect to be billed directly for fees or to authorize RF to directly debit fees from client accounts. Management fees shall be calculated based on the average daily balance which aggregates the daily ending market values for a selected quarter and dividing by the number of days in the quarter. 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.

RF'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, short-term redemption fees, 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 RF's fee, and RF shall not receive any portion of these commissions, fees, and costs.

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

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

RF 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

RF provides portfolio management services to individuals, high net worth individuals, corporate pension and profit-sharing plans, and trust programs.

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

To achieve the specific goals of each client account, RF may direct client assets to be invested in stock funds, fixed income (bond) funds, individual stocks, individual bonds, individual cash equivalent securities, commodity funds, real estate funds and alternative asset funds. RF may direct investments towards domestic investments, or international investments depending on market conditions. RF will also make judgments with regard to allocations towards large, medium and small-cap securities. In addition, analysis will be made regarding the types of fixed-income investments that are appropriate given market conditions with regard to each client's situation.

Investing in securities involves risk of loss that clients should be prepared to bear. The likelihood of loss may be greater if you invest for a shorter time period. Principal risks may include the following: Market and Selection Risk, Investment Style Risk, Small and Mid-Cap Risk, Credit Risk, Foreign Investment Risk, Commodity Risk, Interest Rate Risk, and Derivatives Risk.

Market and Selection Risk is the risk arising from changes in the securities market prices to which an investor has exposure. Investment Style Risk is based on several factors and typically tends to be based on parameters such as risk preference and growth vs. value orientation. Small and Mid-Cap Risk exists because smaller companies tend to have a tighter business focus and smaller company shares may be, on average, more volatile and more sensitive to macroeconomic shifts than the shares of larger companies. Credit Risk is the possibility of a loss resulting from a borrower's failure to repay a loan or meet contractual obligations. Foreign investment risk is the risk of loss when you invest in foreign countries. Commodity risk refers to the uncertainties of future market values and of the size of the future income, caused by the fluctuation in the prices of commodities. These commodities may be grains, metals, gas, electricity etc. Interest Rate Risk is the potential for investment losses that result from a change in interest rates. If interest rates rise, for instance, the value of a bond or other fixed-income investment will decline.

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 RF or the integrity of RF's management. RF has no information applicable to this Item.

Item 10 – Other Financial Industry Activities and Affiliations

Mr. Joseph Rollins, CEO of RF, is also the President of Rollins & Van Lear, P.C., a CPA firm. Mr. Rollins may spend up to 50% of his time on activities relating to the CPA firm. In addition, some of the owners, officers, or employees of RF are also owners, officers or employees of Rollins & Van Lear P.C. and we share office space with Rollins and Van Lear, P.C. Clients in need of CPA services may retain Rollins & Van Lear, P.C. to perform tax work, and tax clients in need of advisory services may retain RF for such services. RF or its employees may benefit financially for referring RF clients to Rollins & Van Lear. This may represent a conflict of interest which RF resolves by disclosure. In addition, although the two firms will each recommend the other to clients, there is no requirement that any client of one firm use the services of the other. The services of each are separate, and are performed for separate and typical compensation.

Item 11 – Code of Ethics

RF 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. All supervised persons at RF must acknowledge the terms of the Code of Ethics annually, or as amended.

RF anticipates that, in appropriate circumstances, consistent with clients' investment objectives, it will cause accounts over which RF has management authority to effect, and will recommend to investment advisory clients or prospective clients, the purchase or sale of securities in which RF, its affiliates and/or clients, directly or indirectly, have a position of interest. RF's employees and persons associated with RF are required to follow RF's Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors and employees of RF and its affiliates may trade for their own accounts in securities which are recommended to and/or purchased for RF's clients.

The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of RF 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 RF'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 Rollins Financial and its clients. RF does not require employees to pre-clear their personal trades in personal accounts, however all trading activities of officers, directors and employees of RF are examined by the firm on a quarterly basis to monitor compliance with The Code of Ethics. RF does require that officers, directors and employees of RF receive pre-clearance for trading in private placements and IPO's.

Certain affiliated accounts may trade in the same securities with client accounts on an aggregated basis when consistent with RF'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. RF 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.

RF's clients or prospective clients may request a copy of the firm's Code of Ethics by contacting Eddie Wilcox.

It is RF's policy that the firm will not affect any principal or agency cross securities transactions for client accounts. RF 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

RF considers the following factors in selecting or recommending brokerage firms for your transactions and in determining the reasonableness of the compensation or other remuneration paid to the brokerage firms: Quality of Services Provided, Implementation Costs, Value of Research and Other Information Provided, Confidentiality of Trading Intentions, Investment Styles (compatibility between RF and the brokerage firm), Trade Error Resolution Process, Ability to Execute Difficult Trades. Other factors may be identified periodically.

RF has established a Best Execution committee which periodically reviews our brokerage practices and the reasonableness of compensation or other remuneration paid to brokerage firms and monitors our efforts to seek best execution of client transactions.

RF does not receive soft dollar benefits. RF does receive access to research, services and support from the custodians of client assets.

Most investments made on behalf of client accounts are mutual funds; therefore, RF does not have the ability to select the broker to execute the transaction. When individual securities are selected for client accounts, the account custodian will generally execute the transaction.

All clients will have the opportunity to select the custodian and/or broker dealer of choice; however, clients in need of custodial serviced will generally have Charles Schwab & Co., Inc. (“Schwab”) or Fidelity Investments, Inc. (“Fidelity”) recommended to them. Depending on the choice made by the client, RF may or may not have the opportunity to negotiate commissions paid by the client, and RF’s ability to obtain best execution may be impaired.

RF participates in the Institutional programs of Charles Schwab & Co., Inc. and Fidelity Investments, Inc., both FINRA members and registered broker-dealers. These service programs are offered to independent investment advisers by the broker/dealers. As a participant in the programs, RF receives some benefits.

RF does receive some benefits by its participation in the institutional programs of Charles Schwab & Co. and Fidelity Investments, although there is no direct link between the investment advice given and participation in the program. These benefits usually include: receipt of duplicate client confirmations and bundled duplicate statements; access to market and economic research reports; access to a service team and trading desk serving adviser participants exclusively; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to client accounts; access to an electronic communications network for client order entry and

account information; receipt of compliance publications; and access to mutual funds which generally require significantly higher minimum initial investments or are generally available only to institutional investors. The benefits received through participation in the program do not necessarily depend upon the proportion of transactions directed to these broker/dealers.

When given discretion to do so, RF will endeavor to select those brokers or dealers which provide the best services at the lowest commission rates possible. The reasonableness of commission is based on the broker's ability to provide professional services, competitive commission rates, research and other services which will help RF in providing investment advisory services to clients. RF may recommend (or use) the use of a broker/dealer who provides useful research and securities transaction services even though a lower commission may be charged by different broker/dealer, who offers no research services and minimal securities transaction assistance. Research services may be useful in servicing all of RF's clients, and not all such research may be useful for the account for which the particular transaction was effected.

Item 13 – Review of Accounts

All Accounts are reviewed in detail at least quarterly by RF, but interim reviews are triggered by a number of factors. These factors may include but are not limited to the following: change in general circumstances, change in personal expense levels, marriage, retirement, economic developments, political changes, market conditions, etc. In addition, RF evaluates the investment philosophy of the firm on an ongoing basis, and performs economic analysis for all accounts. The reviewers include Joseph R. Rollins President/CEO of Rollins Financial, Inc., Robert E. Schultz, III - Investment Advisor Rep., and Edward J. Wilcox - Investment Advisor Rep.

Account custodians are responsible for providing monthly or quarterly account statements which reflect the positions (and current pricing) in each account as well as transactions in each account, including fees paid from an account. Account custodians also provide prompt confirmations of all trading activity, and year-end tax statements, such as 1099 forms. In addition, RF provides a quarterly report for each client. This report includes a summary of portfolio holdings, gains and losses for the period, interest and dividends earned, contributions and withdrawals for the period, investment management fees charged, and a performance review. Additional reports are available upon request.

Item 14 – Client Referrals and Other Compensation

Rollins Financial employs the use of solicitors, as defined in the Investment Advisers Act of 1940. RF enters into a contract with the Solicitor, who then seeks to find clients whose interests may be served by engaging RF for advisory services.

When a Solicitor approaches a potential client, he/she provides the client with a copy of the Solicitor's Disclosure Statement, which outlines the terms of agreement between the Solicitor and RF, and a copy of RF's form ADV, Part 2 and Privacy Policy. The Solicitor must have the client sign an acknowledgement of the receipt of both items prior to RF engaging the client. Clients gained through the use of Solicitors do not pay any additional fees to RF.

In addition, RF does compensate its employees, including our portfolio managers, who refer potential clients to us for our services. Thus, the employee will have a financial interest in the selection of RF by the client for investment management services.

RF may also compensate its affiliated CPA firm, Rollins & Van Lear, P.C. for client referrals as well as receive compensation from Rollins & Van Lear, P.C. for referring clients to it for services. Thus, RF and Rollins & Van Lear P.C., and their officers, directors and owners will have a financial interest in the selection of RF and/or Rollins & Van Lear P.C. by the client for their respective services.

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. RF urges you 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.

RF has the authority to debit accounts in order to collect investment advisory fees. This constitutes RF as having custody of client assets. In addition, RF has the authority to move money to and from client accounts through SLOA's (Standing Letters of Authorization) which also constitutes RF as having custody of client assets.

Item 16 – Investment Discretion

Rollins Financial, Inc. usually receives 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, RF observes the investment policies, limitations and restrictions of the clients for which it advises. For registered investment companies, RF'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 Rollins Financial in writing.

Item 17 – Voting Client Securities

Rollins Financial, Inc. has policies and procedures in place for voting proxies for certain securities on behalf of client accounts. RF seeks to vote the securities in our clients' best interest and generally adheres to predetermined voting guidelines set out in those policies and procedures in the absence of written voting guidelines from the client. Clients who wish to vote their own proxies may revoke this authority from RF. Clients may obtain RF's proxy voting policies and procedures by contacting the RF office at 404-892-7967. In addition, clients may contact RF for information regarding how their securities were voted.

Item 18 – Financial Information

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about RF's financial condition. RF 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.