

Item 1:  
RoseMark Advisors, Inc.  
Part 2A of Form ADV  
The Brochure

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Updated: March 2021

This brochure provides information about the qualifications and business practices of RoseMark Advisors, Inc. (“RMA”). If you have any questions about the contents of this brochure, please contact us at 631-699-2664. 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.

Additional information about RMA is also available on the SEC’s website at: [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Registration as an investment adviser, or any reference to the firm being or the use of the term “registered”, “registration” or “registered investment adviser” does not imply a certain level of skill or training.**

## Item 2: Material Changes

RMA's original submission of Part 2 of Form ADV was made in March 2016. This brochure is a revision of the disclosure submitted in March, 2020 and updated in June, 2020. There are two material changes to the brochure since June, 2020. John Caffrey has resigned from his position as Vice President and co-shareholder as of March 15, 2021 and RMA is no longer eligible to be registered with the SEC and will be submitting a request for registration with New York State.

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## Item 4: Advisory Business

RMA was founded in 2013 and is owned by Matthew M. Racanelli, Rebecca R. Keiffert and the estate of Daniel Weber. RMA is no longer eligible to remain registered with the SEC and is in the process of registering with New York State as an RIA. RMA primarily provides Financial Planning and / or Cash Flow Modeling, for the members of The Association of Mature American Citizens (AMAC). In addition, with respect to RMA clients that wish to receive investment management services, RMA acts as a solicitor for Castle Asset Management, LLC (CAM).

## A. Financial Planning and Cash Flow Modeling

The financial planning and / or cash flow modeling services that RMA provides, generally will address the following areas:

**Financial Organization:** Aid a client in the organization of their important financial documents and determining their personal financial objectives. The purpose is to provide the client with a clear understanding of their current financial position and pointing out specific areas of concern.

**Risk Management:** Identify issues that relate to safeguarding client's assets and other personal property from potential risk and/or liability. Implement the necessary process or product to protect the financial interest of a family in the event of a death or a debilitating illness or injury of a family member.

**Income Tax & Cash Flow Analysis:** Review the ongoing expenses needed by a client to run their household. Identify expense items that can be redirected to savings and investment. Investigating income tax savings measures or debt restructure techniques to improve cash flow.

**College Funding:** Project the future college costs and review programs that help a client provide the needed capital to meet this future (or current) expense.

**Investment Analysis:** Collect the current investment information owned by a client to organize the necessary input for a cash flow model. If necessary, refer the client to an appropriate registered investment advisory firm that will suggest investment alternatives that may be appropriate and consistent with the client's financial plan.

**Retirement Planning:** Review the client's personal and employer sponsored retirement programs. Consider new strategies that could be introduced that help a client meet their retirement goals. Identify the qualified plan options that are available and determine the viability of these plans for clients who are business owners.

**Distribution Planning:** Determine a methodology for a client to access their wealth in retirement in a way that is consistent with their cash flow needs and income tax concerns. This methodology may also serve to protect the interests of a surviving spouse.

**Estate Planning:** Coordinate asset titling, beneficiary designations and other ownership arrangements with the estate plan executed by a qualified attorney selected by the client.

Our financial plan, and / or cash flow modeling, is based on gathering the required information to draft a financial plan or model, through a personal interview with client(s). Information gathered includes the client's current financial status, current and future goals and attitudes toward risk. The client is asked to provide various documents to support the information gathered during these interviews. RMA suggests that a client who chooses to implement the recommendations contained in the financial plan work closely with their other professional advisors. The implementation of the planning recommendations is solely at the client's discretion. The client may implement the planning recommended through RMA and / or their professional associations.

## B. Solicitor for Castle Asset Management, LLC (CAM)

RMA also acts as a solicitor for CAM. RMA may receive solicitor compensation from CAM for the referral of clients to CAM pursuant to a written solicitation agreement between RMA and CAM. Upon engaging CAM, the client will receive a copy of CAM's Form ADV disclosure brochure and a separate disclosure statement discussing RMA's relationship with CAM and the fee that RMA will receive for the referral.

## Item 5: Fees and Compensation

### 1. Financial Planning Program:

RMA may charge a fee when Financial Plans or Cash Flow Models are prepared for clients and fees may be collected based upon the level of service provided. The fee for each plan is quoted in advance, but not prepaid. Financial Planning Fees are negotiable and often the service is provided without a fee.

At the discretion of the Advisor, fixed fees may be charged for financial planning services. The fixed fees charged to a client, for the preparation of a financial plan, typically range from \$500 to \$5,000. All financial planning fees are quoted in advance, prior to the commencement of any work. One half of the fee is collected upon the financial planning engagement and the balance is due upon the completion of the written financial plan.

A client may terminate its agreement with RMA at any time if not satisfied with the services provided. If the agreement is terminated within five days of acceptance, such client will receive a full refund. Also, if RMA does not give a client a copy of their disclosure brochure at least 48 hours prior to execution of our agreement, such client shall have five days from the date of execution of the agreement to terminate services for a full refund.

### 2. Referral Fee Services:

RMA is a solicitor for CAM. CAM has agreed to pay an ongoing referral fee for any such client referrals made by the Advisor. As a solicitor, any potential conflict of interest will be fully disclosed to any individual who may be referred. The amount of the ongoing referral fee will be negotiated with CAM and fully disclosed to the client. The typical ongoing referral fee will range from .25% - 1% of the fee earned by CAM. In the event a referred client terminates its arrangement with CAM, any unearned fees will be refunded immediately. RMA presently has a solicitation arrangement with Castle Asset Management, LLC. Castle Asset Management, LLC is registered as an SEC investment advisor. RMA will continue to receive solicitor compensation, as long as the client's funds remain under CAM's management.

### 3. Insurance Commission Revenue:

RMA is licensed in 50 states to provide Life, Long Term Care and Long Term Disability insurance. It also serves as an insurance broker through its relationship with Voya, Transamerica, Mutual of Omaha and Crump Insurance Services. It also is licensed in 50 states to provide fixed, immediate and indexed annuities.

Certain representatives of RMA are insurance agents/brokers of various insurance companies. RMA and its representatives will earn additional income in the form of commissions in the event a client chooses to purchase insurance products, investments products or investment advisory services from them. The earnings realized by RMA or its representatives are not used to offset any fees billed for Financial Planning or Consulting Services.

Matthew M. Racanelli earns additional compensation from insurance companies in the form of initial and renewal compensation for all life, disability, health or long-term care insurance put in force and after the first policy year. Matthew M. Racanelli is a licensed insurance agent with Crump Life Insurance Services, Mass Mutual Financial Group and Security Mutual Life Insurance Co. of NY and may receive compensation for the sale of insurance products from Advisory and non-Advisory clients. Matthew M. Racanelli also earns additional compensation as a direct solicitor for Castle Asset Management, LLC.

Rebecca R. Keiffert earns additional compensation from insurance companies in the form of initial and renewal compensation for all life, disability, health, long-term care and property and casualty insurance put in force and after the first policy year. Rebecca R. Keiffert is a licensed insurance agent through Hometown Insurance Agency, Inc. and may receive compensation for the sale of insurance products from Advisory and non-Advisory clients. Rebecca R. Keiffert is the Senior Vice President and an owner of Association of Mature American Citizens, Inc., since 2009. She may receive compensation from the operations of AMAC.

Please see further information in Item 10, relating to the additional registrations disclosed in this Item 5, including information pertaining to conflicts of interest arising out of these other registrations of RMA and RMA personnel.

RMA's fees for services are negotiable. In the event that RMA's Advisory services are terminated, a client will receive a refund of any unearned portion of the Advisory fee. RMA will calculate the pro-rata unearned portion and promptly refund such amount, if any. Please see additional information in Item 12, Brokerage Practices.

## **Item 6: Performance Based Fees and Side-by-Side Management**

RMA does not charge any performance fees. Some investment Advisors experience conflicts of interest in connection with the side-by-side management of accounts with different fee structures. However, these conflicts of interest are not applicable to RMA.

## **Item 7: Types of Clients**

RMA may provide Financial Planning and Cash Flow Models for individuals and their associated trusts, estates, pension and profit sharing plans, corporations or other legal entities that are members of AMAC. AMAC members may pay an annual membership fee to AMAC to gain access to member benefits that includes RMA's financial planning and cash flow modeling process.

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

RMA does not provide investment analysis. RMA is a solicitor for Castle Asset Management, LLC. RMA's representatives, do not provide investment advice but may perform the services described in Item 4. RMA's representatives may only provide products and services that are approved by RMA.

All investing involves a risk of loss that clients should be prepared to bear.

## **Item 9: Disciplinary Information**

RMA and its employees have not been involved in any legal or disciplinary events in the past that would be material to a client's evaluation of the company or its personnel.

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

Matthew M. Racanelli is a licensed insurance agent with Crump Life Insurance Services, Mass Mutual Financial Group and Security Mutual Life Insurance Co. of NY and may receive compensation for the sale of insurance products from Advisory and non-Advisory clients. Matthew M. Racanelli also earns additional compensation as a direct solicitor for Castle Asset Management, LLC. For clients who purchase products causing commissions to be generated from such purchases, these commissions are paid to Matthew M. Racanelli in his separate capacity as an insurance agent. This activity represents a conflict of interest and gives him an incentive to recommend the purchase of insurance products for a client account based on that person's ability to receive compensation from such a purchase, rather than based on a client's needs. However, RMA believes that it has addressed this conflict by (a) requiring that any such transaction will be on commercially reasonable terms that are generally consistent with industry standards, and (b) neither requiring nor expecting that a client will purchase any such insurance product from or through Matthew M. Racanelli. In addition, Matthew M. Racanelli must maintain compliance with applicable rules and regulations that govern the sale of such products. All RMA Life, Long Term Care and Disability Insurance policies implemented during the financial planning, cash flow modeling or insurance planning process will be placed through the appropriate RMA license. For additional information related to RMA and its insurance license, please review item 5, section 3.

Matthew M. Racanelli is a 33 percent owner of RMA. RMA is the financial services division of AMAC. Through RMA's marketing process, the members of AMAC have access to the financial planning and cash flow modeling process of RMA. Matthew M. Racanelli, may receive compensation from the business activities of RMA. RMA does not provide Investment Advisory Services. RMA acts as a solicitor. Pursuant to a written solicitation agreement between RMA and Castle, RMA may receive solicitor compensation from Castle for the referral of investment advisory clients to Castle. Upon engaging Castle, the client will receive a copy of Castle's Form ADV disclosure brochure and a separate disclosure statement discussing RMA's relationship with Castle and the fee that RMA will receive for the referral. Castle provides the Investment Advisory Services for RMA clients.

Matthew M. Racanelli is a 33 percent owner of ERM Holdings, an organization that services fire districts. For clients who purchase products causing commissions to be generated from such purchases, these commissions are paid to Matthew M. Racanelli in his separate capacity as an insurance agent. This activity represents a conflict of interest and gives him an incentive to recommend the purchase of insurance products for a client account based on that person's ability to receive compensation from such a purchase, rather than based on a client's needs. However, RMA believes that it has addressed this conflict by (a) requiring that any

such transaction will be on commercially reasonable terms that are generally consistent with industry standards, and (b) neither requiring nor expecting that a client will purchase any such insurance product from or through Matthew M. Racanelli. In addition, Matthew M. Racanelli must maintain compliance with applicable rules and regulations that govern the sale of such products.

Matthew M. Racanelli may earn additional compensation from J&L, LLC. J&L, LLC is a real estate management company.

Matthew M. Racanelli does earn additional compensation from his employment with The Association of Mature American Citizens, Inc.

Matthew M. Racanelli does earn additional compensation from his employment with AMAC Senior Resources Network Inc.

Matthew M. Racanelli may earn additional compensation from Hometown Firefighters, LLC.

Rebecca R. Keiffert is the Senior Vice President and Editor-in-Chief, Mature American Citizens, Inc., the Chief Executive Officer and co-owner of Association of Mature American Citizens, Inc., the Chief Executive Officer and co-owner of AMAC Senior Resources Network, Inc., and founder and co-owner of AMAC Small Business Solutions. Ms. Keiffert is a Chartered Property Casualty Underwriter (CPCU) and a licensed insurance agent with Hometown Insurance Agency of Long Island. Ms. Keiffert was the Chief Operating Officer of Hometown Insurance Agency from 2000-2007, and as Chief Executive and co-owner Officer since 2007. Ms. Keiffert has served as the Chief Operating Officer of Hometown Firefighters, LLC and Hometown Benefits, Inc. since 2007. Ms. Keiffert became a partner of Service Award Associates, LLC in 2014. For clients who purchase products causing commissions to be generated from such purchases, these commissions are paid to Rebecca R. Keiffert in her separate capacity as an insurance agent. This activity represents a conflict of interest and gives her an incentive to recommend the purchase of insurance products for a client account based on that person's ability to receive compensation from such a purchase, rather than based on a client's needs. However, RMA believes that it has addressed this conflict by (a) requiring that any such transaction will be on commercially reasonable terms that are generally consistent with industry standards, and (b) neither requiring nor expecting that a client will purchase any such insurance product from or through Rebecca R. Keiffert. In addition, Rebecca R. Keiffert must maintain compliance with applicable rules and regulations that govern the sale of such products.

Rebecca R. Keiffert is a 33 percent owner of RMA. RMA is the financial services division of AMAC. Through RMA's marketing process, the members of AMAC have access to the financial planning and cash flow modeling process of RMA. Rebecca R. Keiffert, may receive compensation from the business activities of RMA. RMA does not provide Investment Advisory Services. RMA acts as a solicitor for Castle. Pursuant to a written solicitation agreement between RMA and Castle, RMA may receive solicitor compensation from Castle for the referral of investment advisory clients to Castle. Upon engaging Castle, the client will receive a copy of Castle's Form ADV disclosure brochure and a separate disclosure statement discussing RMA's relationship with Castle and the fee that RMA will receive for the referral. Castle provides the Investment Advisory Services for RMA clients.

Rebecca Keiffert is a 33 percent owner of ERM Holdings, an organization that services fire districts. For clients who purchase products causing commissions to be generated from such purchases, these commissions

are paid to Rebecca R. Keiffert in her separate capacity as an insurance agent. This activity represents a conflict of interest and gives her an incentive to recommend the purchase of insurance products for a client account based on that person's ability to receive compensation from such a purchase, rather than based on a client's needs. However, RMA believes that it has addressed this conflict by (a) requiring that any such transaction will be on commercially reasonable terms that are generally consistent with industry standards, and (b) neither requiring nor expecting that a client will purchase any such insurance product from or through Rebecca R. Keiffert. In addition, Rebecca R. Keiffert must maintain compliance with applicable rules and regulations that govern the sale of such products.

Please also see the discussion in Item 5 of this Disclosure Brochure concerning RMA's solicitation arrangement with Castle Asset management, LLC. RMA may be viewed to have an incentive to recommend the services of those companies because RMA may become entitled to receive compensation as a result of those recommendations. Nonetheless, no client is obligated to utilize the services of Castle Asset Management, LLC, and any recommendation RMA makes to those entities will be made where RMA determines that it is in the client's interests.

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

If the possibility of a conflict of interest occurs, the client's interest will prevail. It is the policy of the Advisor, that priority will always be given to the client's orders over the orders of an employee of the Advisor. Advisor and its employees shall 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 his/her employment unless the information is also available to the investing public upon reasonable inquiry. We also require that all personnel act in accordance with all applicable federal and state regulations governing registered investment Advisory practices. Any individual not in observance of the above may be subject to termination.

To avoid any potential conflicts of interest, Advisor has adopted written policies and procedures ("Code") for its employees, which includes a formal code of ethics and insider trading policies and procedures. Advisor's Code requires, among other things, that Employees:

- Act with integrity, competence, diligence, respect, and in an ethical manner with the public, clients, prospective clients, employers, employees, colleagues in the investment profession, and other participants in the global capital markets;
- Place the integrity of the investment profession, the interests of clients, and the interests of Advisor above one's own personal interests;
- Adhere to the fundamental standard that you should not take inappropriate advantage of your position;
- Avoid any actual or potential conflict of interest;
- Conduct all personal securities transactions in a manner consistent with this policy;
- Use reasonable care and exercise independent professional judgment when conducting investment analysis, making investment recommendations, taking investment actions, and engaging in other professional activities;
- Practice and encourage others to practice in a professional and ethical manner that will reflect credit on yourself and the profession;



- Promote the integrity of, and uphold the rules governing, capital markets;
- Maintain and improve your professional competence and strive to maintain and improve the competence of other investment professionals.
- Comply with applicable provisions of the federal securities laws.

Advisor's Code also requires Employees to: 1) pre-clear certain personal securities transactions, 2) report personal securities transactions on at least a quarterly basis, and 3) provide the Advisor with a detailed summary of certain holdings (both initially upon commencement of employment and annually thereafter) over which such Employees have a direct or indirect beneficial interest.

A copy of Advisor's Code shall be provided to any client or prospective client upon request.

## **Item 12: Brokerage Practices**

Advisor is a solicitor for CAM. As a solicitor, any potential conflict of interest will be fully disclosed to any client that may be referred by RMA. The amount of the on-going referral fee will be negotiated with CAM, the investment advisor. The typical on-going referral fee will range from .25% - 1% of the fee earned by CAM. In the event a referred client terminates its arrangement with CAM, any unearned fees will be refunded immediately. Advisor presently has a solicitation arrangement with CAM. CAM is registered as an investment advisor. RMA will continue to receive solicitor compensation as long as the client's funds remain under the management of CAM, the investment advisor. RMA does not provide investment analysis or advice. RMA representatives may only provide products and services that are approved by RMA. RMA will not be involved in the brokerage or custodian selection.

## **Item 13: Review of Accounts**

Client financial plans are reviewed by Advisor's representatives as requested by the client. Other factors that may trigger more frequent reviews include changes in the client's financial, personal or business circumstances. Clients may receive a written update of their financial plan as part of the review process described above. There isn't a specific review process for the life insurance policies placed for a member. A member may contact the insurance representative for typical insurance service issues. Examples of these services are; change of address or beneficiary designation changes.

Clients are kept fully informed about their portfolio activity by receiving copies of all transaction confirmations and monthly/quarterly statements directly from brokerage firms and/or custodians. Additionally, Advisor shall provide to each client correspondence directing the client to Morningstar performance reporting services through which the client may obtain a written report describing the performance, activity and holdings of the account on a quarterly basis.

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

RMA does not receive any other economic benefits from non-clients in connection with the provision of advisory services previously described to clients.

As stated previously, RMA acts as a solicitor for CAM. Pursuant to a written solicitation agreement between RMA and CAM, RMA may receive solicitor compensation from CAM for the referral of investment advisory clients to Castle. Upon engaging CAM, the client will receive a copy of CAM's Form ADV disclosure

brochure and a separate disclosure statement discussing RMA's relationship with CAM and the fee that RMA will receive for the referral. CAM provides the Investment Advisory Services for RMA clients.

### **Item 15: Custody**

All clients' accounts are held in custody by unaffiliated broker/dealers selected by CAM. Account custodians send statements directly to the account owners on at least a quarterly basis. Clients should carefully review these statements, and should compare these statements to any account information provided by RMA or CAM.

### **Item 16: Investment Discretion**

RMA does not have investment discretion over any investment accounts.

### **Item 17: Voting Client Securities**

RMA does not have investment discretion over any investment accounts. RMA will not exercise proxy voting authority over securities held in client accounts. The obligation to vote client proxies shall at all times rest with the client.

Should Advisor inadvertently receive proxy information for a security held in a client's account, then Advisor will make a good faith effort to forward such information on to Client in a timely manner, but will not take any further action with respect to the voting of such proxy.

### **Item 18: Financial Information**

RMA has never filed for bankruptcy and is not aware of any financial condition that is expected to affect its ability to manage client relationships.

Despite this, the firm is uncertain of the negative financial impact of COVID-19. In light of this economic uncertainty, the firm's desire to maintain a fiduciary level of service for all its clients (particularly in a time of crisis), and its hope to retain all existing staff, the firm applied for and received a loan in April 2020 under the Paycheck Protection Program of the CARES Act to support its ongoing operations. The firm intends to use this loan to pay qualifying expenses over an eight-week period including: payroll costs, the continuation of healthcare and insurance benefits for its employees, rent, utilities, and other relevant firm expenses.

Item 1:  
RoseMark Advisors, Inc.  
Part 2B of Form ADV  
The Brochure Supplement

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[www.castleasset.com](http://www.castleasset.com)

Updated: March 2021

This brochure supplement provides information about Matthew M. Racanelli, and Rebecca R. Keiffert. It supplements RMA's accompanying Form ADV brochure. If you have any questions about the contents of this ADV brochure or supplement, or if you would like to request additional or updated copies of either document, please contact us at 631-699-2664.

Additional information about Matthew M. Racanelli, and Rebecca R. Keiffert, is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2: Matthew M. Racanelli's Biographical Information

### Item 1: Educational Background and Business Experience

Matthew M. Racanelli was born in 1984 and received a B.S. in Finance from Boston University. Mr. Racanelli joined Paragon Food and Vending LLC directly out of school and was quickly promoted to the level of CFO. In 2010, Mr. Racanelli was the primary negotiator for the company's sale to Compass Group, a worldwide leader in the food service industry. Matthew spent the next year consulting for Compass to facilitate the efficient acquisition of Paragon. In early 2011, he joined Castle Financial Advisors, LLC and Castle Asset Management, LLC where he used both his knowledge of business and finance to serve his client's needs. In 2013 he was the co-founder of RoseMark Advisors, an organization which provides financial services to AMAC, The Association of Mature American Citizens. Matthew is also employed by The Association of Mature American Citizens, Inc. Matthew is also Co-Owner of ERM Holdings.

### Item 2: Disciplinary Information

Mr. Racanelli has not been involved in any legal or disciplinary events that would be material to a client's evaluation of Mr. Racanelli or of RMA.

### Item 3: Other Business Activities

Mr. Racanelli is a licensed insurance agent with Crump Life Insurance Services, Mass Mutual Financial Group and Security Mutual Life Insurance Co. of NY and may receive compensation for the sale of insurance products from Advisory and non-Advisory clients. Matthew M. Racanelli also earns additional compensation as a direct solicitor for Castle Asset Management, LLC. Matthew Racanelli also receives additional compensation from ERM Holdings.

#### Mr. Racanelli's Employment History

Paragon Vending Member since 2005 - 2012	J & L, LLC Member since 2007
The Association of Mature American Citizens, Inc. Since 2016	RoseMark Advisors, Inc. Co-owner since 2013
AMAC Senior Resources Network Inc. Since 2017	ERM Holdings Co-Owner since 2020

### Item 4: Additional Compensation

Matthew M. Racanelli is a 33% owner of RMA. RMA is the financial services division of AMAC. Through RMA's marketing process, the members of AMAC have access to the financial planning and cash flow modeling process of RMA. Matthew M. Racanelli, may receive compensation from the business activities of RMA. RMA acts as a solicitor for Castle.

As mentioned above, the co-shareholder of Advisor, Mr. Racanelli is a licensed insurance agent with Crump Life Insurance Services, Mass Mutual Financial Group and Security Mutual Life Insurance Co. of NY and may receive compensation for the sale of insurance products from advisory and non-advisory clients. Matthew M. Racanelli also earns additional compensation as a direct solicitor for Castle Asset Management, LLC. Matthew M. Racanelli may also receive compensation from his work with Hometown Firefighters, LLC.

#### Item 5: Supervision

As RMA's co-founder and President, Mr. Racanelli is responsible for the company's operations. Matthew Racanelli can be reached directly by calling the telephone number on the cover of this brochure supplement.

### **Item 4: Rebecca R. Keiffert's Biographical Information**

#### Item 1: Educational Background and Business Experience

Rebecca R. Keiffert was born in 1970. Beginning in 1989, Ms. Keiffert has been a licensed insurance agent with Hometown Insurance Agency of Long Island. Ms. Keiffert has served as Chief Operating Officer of Hometown Insurance Agency from 2000-2007, and as Chief Executive Officer since 2007. Ms. Keiffert has served as the Chief Operating Officer of Hometown Firefighters, LLC and Hometown Benefits, Inc. since 2007. Ms. Keiffert is a Chartered Property Casualty Underwriter (CPCU)

#### Item 2: Disciplinary Information

Ms. Keiffert has not been involved in any legal or disciplinary events that would be material to a client's evaluation of Ms. Keiffert or of RMA.

#### Item 3: Other Business Activities

Ms. Keiffert has been:

Since 2014 - co-member of Service Award Associates, LLC.

Since 2007 - Senior Vice President and Editor-in-Chief, Mature American Citizens, Inc.

Since 2009 - Senior Vice President and owner of Association of Mature American Citizens, Inc.

Since 2011 - Chief Executive Officer and owner of AMAC Senior Resources Network

Since 2013 - co-owner of RoseMark Advisors, Inc., the financial services division of AMAC.

Since 2014 - Founder and co-owner of AMAC Small Business Solutions

Since 2016 – Baypoint Insurance Agency

Since 2016 – AMAC Real Estate Services, Inc.

Since 2016 – AMAC Brokerage Services, Inc.

Since 2020 – ERM Co-Owner

#### Ms Keiffert 's Employment History

Hometown Insurance of LI, Inc.

Member since 1989

Hometown Firefighters, Inc.

Member since 2007

Association of Mature American Citizens, Inc.

Co-Owner since 2007

AMAC Senior Resources Network

Co-Owner since 2011

RoseMark Advisors, Inc.

Member since 2013

Hometown Travel Agency

Co-Owner since 2013

AMAC Small Business Solutions

Co-Owner since 2014

Service Awards Associates, LLC

Member since 2014

Baypoint Insurance Agency, Inc.

Co-Owner Since 2016

AMAC Real Estate Services, Inc.

Co-Owner Since 2016

AMAC Brokerage Services, Inc.  
Co-Owner Since 2016

ERM Holdings  
Co-Owner – Since 2020

Item 4: Additional Compensation

Rebecca R. Keiffert is a 33% owner of RMA. RMA is the financial services division of AMAC. Through RMA's marketing process, the members of AMAC have access to the financial planning and cash flow modeling process of RMA. Rebecca R. Keiffert, may receive compensation from the business activities of RMA. RMA acts as a solicitor for Castle. RMA does not provide any Investment Advisory Services.

As mentioned above, the co-shareholder of Advisor, is the Senior Vice President and Editor-in-Chief, Mature American Citizens, Inc., the Senior Vice President and co-owner of Association of Mature American Citizens, Inc., the Chief Executive Officer and co-owner of AMAC Senior Resources Network, Inc., a 25% owner of Hometown Travel Agency, the travel division of AMAC and founder and co-owner of AMAC Small Business Solutions. Ms. Keiffert is a licensed insurance agent with Hometown Insurance Agency of Long Island. Ms. Keiffert was the Chief Operating Officer of Hometown Insurance Agency from 2000-2007, and as Chief Executive Officer since 2007. Ms. Keiffert has served as the Chief Operating Officer of Hometown Firefighters, LLC and Hometown Benefits, Inc. since 2007. Ms. Keiffert became a partner of Service Award Associates, LLC in 2014. Ms. Keiffert may earn additional compensation from insurance products sold or operational revenue from the various entities related to advisory or non-advisory clients. Rebecca Keiffert also receives compensation from ERM Holdings.

Item 5: Supervision

As RMA's co-founder and President, Mr. Racanelli is responsible for the company's operations. Matthew Racanelli can be reached directly by calling the telephone number on the cover of this brochure supplement.