

# FIRM BROCHURE

(PART 2A of Form ADV)

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Part 2A of Form ADV (the "Brochure") provides information about the qualifications and business practices of Jon D. Rock, Inc. If you have any questions about the contents of this Brochure, please contact us at [info@jondrock.com](mailto:info@jondrock.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority.

Jon D. Rock, Inc. is registered as an investment adviser with the U.S. Securities and Exchange Commission; however, such registration does not imply a certain level of skill or training and no inference to the contrary should be made.

Additional information about Jon D. Rock, Inc. is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

Form ADV Part 2



## ITEM 1: COVER PAGE

Please refer to the previous page.

## ITEM 2: MATERIAL CHANGES

Pursuant to SEC Rules, Jon D. Rock will ensure that clients receive a summary of any material changes to this Brochure within 120 days of the close of the Firm's fiscal year end, along with a copy of this Brochure or an offer to provide the Brochure. Additionally, as Jon D. Rock experiences material changes in the future, we will send you a summary of our "Material Changes" under separate cover. For more information about the Firm, please contact the Firm at [info@jondrock.com](mailto:info@jondrock.com).

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## ITEM 4: ADVISORY BUSINESS

### A. DESCRIPTION OF FIRM

Jon D. Rock, Inc. ("Jon D. Rock" or the "Firm") is a New York, New York – based investment adviser firm founded in 2021, offers financial planning software and services. Jon D. Rock provides investment advice through its proprietary financial planning software, which is provided through a mobile application to individuals and high net – worth clients ("clients"). As discussed more fully below, Jon D. Rock assists clients with goals – based investment management, financial planning, portfolio management optimization, liabilities management, determination of financial objectives, cash flow management, risk management planning, estate planning, education funding, retirement planning, and tax planning.

Jon D. Rock is currently registered with the Securities and Exchange Commission ("SEC") as an investment adviser. The Firm conducts business primarily through the internet across the United States. Jon D. Rock is 100% owned by Carlos G. Amador.

### B. TYPES OF ADVISORY SERVICES OFFERED

Jon D. Rock primarily provides two types of advisory services. Financial Planning Software Services and Fee – Only Financial Planning. Each of these services is described in detail below.

1. Financial Planning Software Services – Jon D. Rock offers a proprietary software solution through a mobile application that aggregates client's financial and risk profile, financial accounts, goals, objectives and delivers ongoing aggregation, monitoring, and optimization advice linked to standards, best practices and economic and industry dynamics.
2. Fee – Only Financial Planning – The Firm offers fee – only financial planning advice and access to a financial planner to clients for advice on tax minimization, investment strategy, estate planning, risk management, budgeting, liabilities management and goal – based planning. As of the date of this Form ADV, Part 2A, Jon D. Rock offers this service to a maximum of fourteen (14) clients.
3. Educational Content – From time to time, Jon D. Rock offers educational content distributed online to software users, clients and the general public.

In the cases of Financial Planning Software Services and Fee - Only Financial Planning, Jon D. Rock provides clients with investment advice relating to publicly traded securities, including ETFs, mutual funds, taking into account information provided by its clients.

### C. GENERAL INFORMATION ABOUT JON D. ROCK'S SOFTWARE SERVICES

Jon D. Rock's proprietary software solution offers asset allocation investment strategies and advisory services as part of a holistic overall financial plan that utilizes financial planning best practices, academic theory, ratios, formulas, benchmarks, statistical analyses, historical financial markets return and other standards. The software utilizes these data inputs and client specific information provided through the technology onboarding process to deliver portfolio optimization, liabilities management, goal – based planning, education cost management, budgeting, insurance planning and estate planning analysis, aggregation and advice.

### D. WRAP – FEE PROGRAMS

Jon D. Rock does not provide portfolio management services to any wrap – fee programs, as the term is defined in the instruction to Form ADV Part – 2.

### E. ASSETS UNDER MANAGEMENT

As a newly-registered investment adviser, Jon D. Rock does not maintain client assets under management on a discretionary or non – discretionary basis but anticipates meeting the threshold for maintaining SEC registration.

## ITEM 5: FEES AND COMPENSATION

### A. ADVISORY FEES

The following schedule of fees outlines the typical fee structure under which Jon D. Rock renders its services.

1. Financial Roadmap – For \$5.99 a month, users receive: (i) Financial snapshot; (ii) Clear strategic roadmap; (iii) Portfolio guidance; (iv) Actionable items and timeline; and, (v) Calculate future net worth with scenarios.
2. Financial Freedom with CFO Connect – For \$98.99 a month, users receive: (i) Financial snapshot; (ii) Clear strategic roadmap; (iii) Portfolio guidance; (iv) Actionable items and timeline; (v) Calculate future net worth with scenarios; (vi) Connect with a dedicated personal financial planner; and, (vii) Speak directly to your planner at your convenience.

## **B. BILLING METHOD**

Fees are deducted monthly in advance from a client bank account or credit card information stored on file. The client must consent in advance to direct debiting of their bank account or credit card on file.

## **C. OTHER FEES AND EXPENSES**

Clients pay no other fees other than the monthly fees described herein.

## **D. TERMINATION OF SERVICES**

Clients can terminate Jon D. Rock's services at any time. Financial Roadmap clients will receive access to the application until the last day of the month of termination. Financial Freedom clients who have invested in a model portfolio must allow for a T + 2 time frame for settlement before cash can be sent to their designated financial institution.

## **E. NO COMPENSATION FOR SALE OR SECURITIES**

Jon D. Rock does not accept compensation for the sale of securities or other investment products, other than as part of the fees described above.

## **ITEM 6: PERFORMANCE – BASED FEES AND SIDE – BY – SIDE MANAGEMENT**

Jon D. Rock does not charge performance – based fees. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees. John D. Rock does not engage in side-by-side management.

## **ITEM 7: TYPES OF CLIENTS**

Jon D. Rock provides financial planning software services to individuals and high – net worth clients. There is no minimum account size or investment minimum.

## **ITEM 8: METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS**

### **1. METHODS OF ANALYSIS**

In formulating financial planning advice, Jon D. Rock software analyzes the client's financial information, risk profile, goals and objectives. On the back – end algorithms forecast the future economic environment utilizing historical asset class rates of return, statistical relationships and economic data. This in turn feeds into financial planning ratios to guide an optimized asset allocation and model suitable asset classes for particular investment portfolios. Asset classes include, but are not limited to publicly traded REITS, ETFs and MLPs.

## 2. INVESTMENT STRATEGIES

The primary investment strategy behind Jon D. Rock's software is modeled according to varying economic theories including the Efficient Market Hypothesis, Modern Portfolio Theory and Behavioral Finance. User – driven factors, such as goal – based roadmaps, investment time horizon, desired rate of return and risk aversion assist in driving the software generated advice across different asset classes and investment styles.

Investment strategies are based on interactive online questionnaires that gather information about tax filing stat, yearly income, monthly living expenses and detailed questions about investment objectives, knowledge level, risk profile and time frame. These questions include:

- What is your primary investment objective today?
- Which of the following reflects your current knowledge of investments?
- How much would your portfolio have to decline in ONE year in order for you to consider selling your investments?
- How soon do you expect to need the money you are investing?
- How do you expect a financial planner to be most helpful to you in the near-term?

## 3. RISK OF LOSS

Financial planning and investing involve significant risks of loss, and all investments have underlying risks that are non – diversifiable.

Some risks of loss that Jon D. Rock users should be aware of include, but are not limited to:

1. Currency/Exchange Rate Risk: Dollar value fluctuations against the currency of the investment's originating country.
2. Market Risk: Cannot be eliminated through diversification. Possibility that an investment experiences loss due to circumstances that affect the overall performance of investments in the financial markets.

3. *Inflation Risk*: Decline in purchasing power due to inflation undermining an investment's return.
4. *Interest – Rate Risk*: Risk of investment losses resulting from a change in interest rates.
5. *Political and Legislative Risk*: Risk that investment returns could suffer as a result of political changes or instability in a country.
6. *Reinvestment Risk*: Probability that cash generated from fixed income flows, such as coupon payments, will not be reinvested at a rate equal to their current rate of return.
7. *Business Risk*: Possibility that an enterprise will not generate the expected profits due to a change in consumer tastes, preferences, strikes, increased competition, government policy and/or any, and all, other uncertainties.
8. *Financial Risk*: Possibility that an enterprise won't be able to meet its financial obligations.
9. *Liquidity Risk*: The inability of an enterprise to meet its short - term financial obligations.

## ITEM 9: DISCIPLINARY ACTION

Jon D. Rock, an investment adviser registered with the SEC, is required to disclose all material facts regarding any legal or disciplinary event that would be material to a client or prospective client's evaluation of the Firm or the integrity of its management. The Firm has not been subject to any such legal or disciplinary event. There is no information to disclose in respect to this Item.

## ITEM 10: OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Jon D. Rock, nor any of its management members, is a registered broker – dealer, futures commission merchants, commodity pool operator nor a commodity trading advisor.

The Firm does not have affiliations with any related person who is a broker – dealer, investment company, other investment advisor, commodity pool operator, banking or thrift institution, accounting or legal firm, insurance company, pension consultant, real estate broker or an enterprise that packages limited liability partnerships.

Jon D. Rock does not receive compensation directly or indirectly from other advisers or institutions that would create any conflicts of interest.

## ITEM 11: CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

### A. CODE OF ETHICS SUMMARY

Jon D. Rock owes a duty of loyalty, fairness, integrity and good faith to its clients. The Firm adheres to the general principles that are documented in its Code of Ethics. The Code of Ethics requires that employees comply with their fiduciary obligations and securities laws. Clients can request and be provided a copy of our Code of Ethics by sending a request to [info@jondrock.com](mailto:info@jondrock.com).

The Firm acts in a fiduciary capacity, putting the clients' best interest ahead of its own, and carefully managing perceived or actual conflicts of interest.

## **B. PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING**

Jon D. Rock's and individuals associated with Jon D. Rock are permitted to buy or sell securities identical to or different than those recommended to clients for their personal accounts. In addition, any related person(s) may have an interest or position in certain securities which may also be recommended to a client. In such instances, Jon D. Rock or its related persons may have a financial incentive to buy or sell such securities for client accounts.

### **ITEM 12: BROKERAGE PRACTICES**

Jon D. Rock utilizes Apex Brokerage to execute transactions for portfolio accounts and to perform custody services. However, Jon D. Rock does not engage in any "soft dollar" practices nor does it compensate, reward Apex for client referrals nor does it accept payment for Clients' order flow.

### **ITEM 13: REVIEW OF ACCOUNTS**

Jon D. Rock provides users continuous access via the mobile application, where clients can access account profile information. Clients can utilize various tools on the interface to review their investment portfolios and better understand their holdings, asset allocation, expected future value and performance information. The Firm's algorithms continuously review user portfolios to confirm their positions are within a set range of their Allocation. If a client's portfolio deviates from this range, Jon D. Rock will rebalance the portfolio back to its target Allocation. Jon D. Rock's financial planning personnel conduct focused reviews of model portfolios, client accounts, and specified goals to confirm clients are on target. Further, the "Firm" notifies users on a quarterly basis to update account profile details via the interface.

### **ITEM 14: CLIENT REFERRALS AND OTHER COMPENSATION**

Jon D. Rock expects to run promotional campaigns to attract Clients to download the mobile application and open an account. The Firm expects to structure certain arrangements in which it pays



social media content creators and distributors a flat fee for campaign dissemination or per client response.

## ITEM 15: CUSTODY

Jon D. Rock does not have, nor does it plan, to hold or be deemed to hold custody of client assets. Jon D. Rock will be utilizing Apex as its custodian.

## ITEM 16: INVESTMENT DISCRETION

Jon D. Rock maintains investment discretion through its models, which determines asset allocation for clients and rebalances client portfolios accordingly.

## ITEM 17: VOTING CLIENT SECURITIES

Jon D. Rock will not vote proxies on behalf of the Client's Accounts. Additionally, Jon D. Rock will not be required to take any action or render any advice with respect to voting of proxies solicited by or with respect to the issuers of securities in which assets of the Account may be invested from time to time. Clients may receive proxy materials directly from a third-party vendor on behalf of Jon D. Rock and are responsible for voting the shares in their Accounts. Further, when Jon D. Rock receives notice of a vote regarding a corporate action, legal proceeding, or other related matter for a security in the Client's Account, Jon D. Rock or a third party may forward such notice to the Client's email, provided that the email address on file for the Client's Account is valid. It shall be the Client's sole responsibility on whether to vote and how to vote and whether to engage in any legal proceeding.

## ITEM 18: FINANCIAL INFORMATION

Jon D. Rock does not require or solicit prepayment of advisory fees more than one month in advance. Therefore, the Firm is not required to provide a balance sheet. There are no financial conditions which Jon D. Rock anticipates that will impact the firm's ability to meet our contractual commitment to clients.

Jon D. Rock has not been the subject of a bankruptcy proceeding.