



## **Form ADV Part 2A**

**July 26, 2023**

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This brochure provides information about the qualifications and business practices of Rock Creek Wealth Planners and Advisors, LLC. Registration as an investment adviser does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us at: 202-899-1400. 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 Rock Creek Wealth Planners and Advisors, LLC (CRD #298104) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Item 2 – Material Changes**

This section describes only the material changes that have been made to this Brochure since the last annual update, which was filed on March 31, 2023.

- “Item 10 – Other Financial Industry Activities and Affiliations” has been updated. Lewis Baker is no longer associated with a broker-dealer as a registered representative.
- “Item 5 - Fees and Compensation” has been updated to reflect the new fee structure.

We have also updated language throughout this Brochure to clarify our business practices. These clarifications do not represent material changes and therefore are not summarized in this section, but we encourage all clients and prospective clients to read this Brochure in its entirety.

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## **Item 4 – Advisory Business**

Rock Creek Wealth Planners and Advisors, LLC (“Rock Creek”) was founded in 2018. Lewis Baker is 100% owner. We offer the following investment advisory services.

### **ASSET MANAGEMENT**

Rock Creek offers discretionary and non-discretionary asset management services to advisory Clients. Rock Creek offers Clients ongoing asset management services through determining individual investment goals, time horizons, objectives, and risk tolerance. Investment strategies, investment selection, asset allocation, portfolio monitoring and the overall investment program will be based on the above factors. We ask Clients to grant Rock Creek discretionary authority to execute selected investment program transactions as stated within the Investment Advisory Agreement.

#### **Discretionary**

When the Client provides Rock Creek discretionary authority the Client will sign a limited trading authorization or equivalent. Rock Creek will have the authority to execute transactions in the account without seeking Client approval on each transaction.

#### **Non-discretionary**

When the Client elects to use Rock Creek on a non-discretionary basis, Rock Creek will recommend the securities to be bought or sold and the amount of the securities to be bought or sold, and Rock Creek will obtain prior Client approval on each and every transaction before executing any transaction.

When deemed appropriate for the Client, Rock Creek may hire Sub-advisors to manage all or a portion of the assets in the Client account. Rock Creek has full discretion to hire and fire Sub-advisors as they deem suitable. Sub-advisors will maintain the models or investment strategies agreed upon between Sub-advisor and Rock Creek. Sub-advisors execute all trades on behalf of Rock Creek in Client accounts. Rock Creek will be responsible for the overall direct relationship with the Client. Rock Creek retains the authority to terminate the Sub-advisor relationship at Rock Creek’s discretion.

### **FINANCIAL PLANNING AND CONSULTING**

Rock Creek provides financial planning and consulting services. This service provides a review of applicable topics as requested by the Client, including but not limited to, the financial aspects of planning and implementing Wills, Estate Plans and Trusts, Investments, Taxes, Qualified Plans, Insurance, Retirement Income, Social Security, Business Exit and Succession Planning, Divorce Planning, and College Planning will be reviewed. Rock Creek is not a law firm or accounting firm and does not provide legal or tax advice. If a conflict of

interest exists between the interests of Rock Creek and the interests of the Client, the Client is under no obligation to act upon Rock Creek's recommendation. If the Client elects to act on any of the recommendations, the Client is under no obligation to effect the transaction through Rock Creek or its representatives. Financial plans will be offered on an ongoing basis and will remain in effect year over year unless canceled in writing by either party by giving the other party thirty (30) day written notice.

Rock Creek tailors its services to the individual needs of Clients. The goals and objectives for each Client are documented in our Client files. Investment strategies are created that reflect the stated goals and objectives. Clients may impose restrictions on investing in certain securities or types of securities.

Rock Creek does not sponsor or participate in any wrap fee programs.

As of December 31, 2022, Rock Creek has approximately \$40,263,879 in discretionary assets under management.

## Item 5 – Fees and Compensation

### ASSET MANAGEMENT

Rock Creek offers direct asset management services to advisory Clients. Rock Creek charges an annual investment advisory fee based on the total assets under management with Financial Planning included:

Assets Under Management	Annual Fee
Up to \$249,999.99	1.53%
\$250,000 to \$499,999.99	1.25%
\$500,000 to \$ 1,999,999.99	1.15%
Over \$2,000,000	*Negotiated Flat Fee:

### **Investment Management – Without Financial Planning Included:**

Assets Under Management	Annual Fee
Up to \$499,999.99	1.15%
\$500,000 to \$1,999,999.99	.85%
Over \$2,000,000	*Negotiated Flat Fee:

The fee schedule for investment management services is a combined fee schedule. For example, if Investment Management with Financial Planning is selected and your aggregated household account value is \$750,000, the annualized fee is 1.15%.

All fees are negotiable in Rock Creek's sole discretion. Fees are billed on either a monthly, quarterly or semi-annually in advance, based on the amount of assets managed as of the close of business on the last business day of the previous month or quarter. If margin is utilized, the fees will be billed based on the net asset value of the account. Also, third party managers may be hired which may have their own internal fees that will be borne by the account holder. Lower fees for comparable services may be available from other advisors. Clients may terminate advisory services with thirty (30) days written notice. For accounts opened or closed mid-billing period, unearned fees will be refunded to the Client. Clients shall be given thirty (30) days prior written notice of any increase in fees.

Rock Creek generally obtains authorization from the Client to deduct its advisory fees directly from the Client's accounts, although Clients may elect to be billed instead.

If Rock Creek utilizes the services of a Sub-advisor to manage Clients' investment portfolios, Rock Creek will enter into Sub-advisor agreements with other registered investment advisor firms. When using Sub-advisors, the Client will not pay additional fees. The Sub-advisors' fees are inclusive of the fees charged by Rock Creek.

#### FINANCIAL PLANNING AND CONSULTING

Rock Creek charges an annual fixed fee for financial planning and consulting services that will be charged monthly, quarterly or semi-annually in advance. Prior to the planning process the Client will be provided an estimated annual fee. Services are offered periodically throughout the year. Upon termination, any unearned fees will be refunded to the Client, or any unpaid earned fees will be due to Rock Creek. Rock Creek reserves the right to waive its planning fee in its sole discretion, including for Clients who elect to implement the plan through Rock Creek.

The minimum annual fee is \$3,825 depending on the estimated complexity and the time spent on the services. Fees for financial planning and consulting services are billed either monthly, quarterly or semi-annually in advance. Either party may terminate upon thirty (30) days written notice.

#### ADDITIONAL FEES AND EXPENSES

All fees paid to Rock Creek are separate and distinct from the fees and expenses charged by custodians, broker-dealers, mutual funds, exchange-traded funds, and other third parties. Mutual fund and exchange-traded fund fees and expenses can include, but are not limited to, servicing fees, sub-accounting fees, management fees, custody fees, portfolio transaction execution costs, administration fees and distribution fees. These kinds of fees and expenses are deducted from each fund's net asset value and, as such, are an indirect expense of the investor. Actively managed funds generally charge higher fees than passive, non-managed "index" funds. Clients should review the fund prospectus or other offering documents for more information about fees and expenses.

All fees and expenses that are charged directly or indirectly to the Client will reduce the Client's investment return.

#### External Compensation

Mr. Baker is also a part of a management team for The Academy Fund as Director of National Accounts. He receives compensation based on his contribution of less than 10% of the total revenue. He spends less than 10% of his time on this function. Clients are not required to purchase this fund, but it is being disclosed due to potential conflict of interest.

For more details on our brokerage practices, see Item 12 of this brochure.

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

Rock Creek 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**

Rock Creek provides investment advice to individuals, high net worth individuals, corporations or business entities, and qualified plans.

We do not have a mandatory minimum account size.

## **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. Past performance is not a guarantee of future returns.

Rock Creek uses both fundamental analysis and technical analysis in formulating its investment advice and in managing assets.

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Technical analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not account for new patterns that emerge over time.

In developing financial planning and consulting services for a Client, Rock Creek's analysis includes cash flow analysis, investment planning, risk management, tax planning and estate planning, depending on the Client's specific needs and requests. Based on the information gathered, a detailed strategy is tailored to the Client's specific situation.

The main sources of information include Morningstar, research from Charles Schwab & Company, Fidelity Investments, and financial newspapers and magazines. We also review transcripts of earnings calls and press releases.

The investment strategy for a specific Client is based upon the objectives stated by the Client during consultations. The Client may change these objectives at any time by providing written notice to Rock Creek. Each Client executes a Client profile form or similar form that documents their objectives and their desired investment strategy.

Other strategies may include long-term purchases, short-term purchases, trading, and option writing or purchasing (including covered options, uncovered options, or spread strategies).

Investing in securities involves risk of loss that clients should be prepared to bear. Security markets are volatile and can decline significantly in response to adverse issuer, political, regulatory, market, or economic developments. When securities are sold, they may be worth more or less than what they were purchased for, which means that you could lose money.

Investors face the following investment risks:

- *Interest-rate Risk* - Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- *Market Risk* - The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's underlying circumstances. For example, political, economic, and social conditions may trigger market events.
- *Inflation Risk* - When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- *Currency Risk* - Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- *Reinvestment Risk* - This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e., interest rate). This primarily relates to fixed income securities.
- *Business Risk* - These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.

- *Liquidity Risk* - Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- *Financial Risk* - Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.
- *Equity Risk* - Equity securities (including mutual funds and ETFs that hold equity securities) tend to be more volatile than other investment choices. The value of an individual stock, mutual fund or ETF can be more volatile than the market as a whole. This volatility affects the value of the Client's overall portfolio. Small- and mid-cap companies are subject to additional risks. Smaller companies may experience greater volatility, higher failure rates, more limited markets, product lines, financial resources, and less management experience than larger companies. Smaller companies may also have a lower trading volume, which may disproportionately affect their market price, tending to make them fall more in response to selling pressure than is the case with larger companies.
- *Fixed Income Risk* - The issuer of a fixed income security may not be able to make interest and principal payments when due. Generally, a lower credit rating of a security represents a rating agency's assessment that there is higher risk that the issuer will default on its obligation. This can also be a self-fulfilling prophecy, in that, if a rating agency gives a debt security a lower rating, the value of the debt security will decline because investors will demand a higher rate of return. As nominal interest rates rise, the value of fixed income securities held by a fund is likely to decrease. A nominal interest rate is the sum of a real interest rate and an expected inflation rate.
- *Investment Companies Risk* - When a Client invests in open end mutual funds or ETFs, the Client indirectly bears the Client's proportionate share of any fees and expenses payable directly by those funds. Therefore, the Client will incur higher expenses. In addition, the Client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives). ETFs are also subject to the additional risks, including that: (i) an ETF's shares may trade at a market price that is above or below their net asset value or (ii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are delisted from the exchange, or the activation of market-wide "circuit breakers"

(which are tied to large decreases in stock prices) halts stock trading generally. Adviser has no control over the risks taken by the underlying funds in which Client invests.

- *REIT Risk* - To the extent that a Client invests in REITs, the investment is subject to risks generally associated with investing in real estate, such as (i) possible declines in the value of real estate, (ii) adverse general and local economic conditions, (iii) possible lack of availability of mortgage funds, (iv) changes in interest rates, and (v) environmental problems. In addition, REITs are subject to certain other risks related specifically to their structure and focus such as: dependency upon management skills; limited diversification; the risks of locating and managing financing for projects; heavy cash flow dependency; possible default by borrowers; the costs and potential losses of self-liquidation of one or more holdings; the possibility of failing to maintain exemptions from securities registration; and, in many cases, relatively small market capitalization, which may result in less market liquidity and greater price volatility.
- *Derivatives Risk* - Funds in a Client's portfolio may use derivative instruments. The value of these derivative instruments derives from the value of an underlying asset, currency, or index. Investments by a fund in such underlying funds may involve the risk that the value of the underlying fund's derivatives may rise or fall more rapidly than other investments, and the risk that an underlying fund may lose more than the amount that it invested in the derivative instrument in the first place. Derivative instruments also involve the risk that other parties to the derivative contract may fail to meet their obligations, which could cause losses.
- *Foreign Securities Risk* - Funds in which Clients invest may invest in foreign securities. Foreign securities are subject to additional risks not typically associated with investments in domestic securities. These risks may include, among others, currency risk, country risks (political, diplomatic, regional conflicts, terrorism, war, social and economic instability, currency devaluations and policies that have the effect of limiting or restricting foreign investment or the movement of assets), different trading practices, less government supervision, less publicly available information, limited trading markets and greater volatility. To the extent that underlying funds invest in issuers located in emerging markets, the risk may be heightened by political changes, changes in taxation, or currency controls that could adversely affect the values of these investments. Emerging markets have been more volatile than the markets of developed countries with more mature economies.
- *Long-term purchases* - Long-term investments are those vehicles purchased with the intention of being held for more than one year. Typically, the expectation of the investment is to increase in value so that it can eventually be sold for a profit, but

this cannot be guaranteed. In addition, there may be an expectation for the investment to provide income, but dividends and distributions can be reduced or eliminated. One of the biggest risks associated with long-term investments is volatility, in that the fluctuations in the financial markets can cause investments to lose value.

- *Short-term purchases, cash, and cash equivalents* - We generally recommend short-term investments (those intended to be held for one year or less), or the holding of cash or cash equivalents, for the relatively greater degree of principal protection they are designed to provide. In general, there is not a high expectation for a return or an increase in value.
- *Trading risk* - Investing involves risk, including possible loss of principal. There is no assurance that the investment objective of any fund or investment will be achieved.
- *Options Trading* - There are many risks associated with trading options. All Clients who elect to allow options trading in their accounts will be provided with a copy of the Options Clearing Corporation's disclosure document, "Characteristics And Risks Of Standardized Options," which describes these risks in detail. We urge all Clients to read it carefully.
- *Trading on Margin* - In a cash account, the account owner's risk is limited to the amount of money that has been invested. In a margin account, the account owner's risk includes the amount of money invested plus the amount that has been loaned. As market conditions fluctuate, the value of marginable securities will also fluctuate, causing a change in the overall account balance and debt ratio. As a result, if the value of the securities held in a margin account depreciates, the Client could be required to deposit additional cash or make full payment of the margin loan to bring the account back up to maintenance levels. The custodian is entitled to liquidate (sell or, if the client holds short positions, buy) the Client's holdings if the Client does not immediately comply with all margin calls. The brokerage firm will provide all Clients who apply for margin privileges with a risk disclosure describing additional risks of trading on margin. We urge all Clients to read it carefully.
- *Equity Linked CD Risk* - Penalties may apply to early withdrawals. Fair market value of CD's when sold in the secondary market may be worth more or less than face value, may or may not be FDIC insured. Returns are not based solely on market returns, as there may be a maximum rate of interest the CD will earn. May be taxed on income earned, but interest isn't accrued (received) until the CD matures. Many CDs may have "call" features, allowing the bank to close the contract early with no penalty, paying back principal and any accrued interest.

- *Structured Notes Risk* - The risks involved with using structured notes are credit risk of the issuing investment bank, illiquidity, and there is a risk to the pricing accuracy as most structured notes do not trade after issuance.
- *Hedge Funds Risk* - The risks involved with hedge funds are that they may invest in unregistered investments that are not subject to the SEC's registration and disclosure requirements. They may have risky investment strategies, which may include speculative investment and trading strategies. Both unregistered and registered hedge funds are illiquid investments and are subject to restrictions on transferability and resale. The tax structure of investments in hedge funds may be complex.
- *Private Equity/Placement Risk* - Because offerings are exempt from registration requirements, no regulator has reviewed the offerings to make sure the risks associated with the investment and all material facts about the entity raising money are adequately disclosed. Securities offered through private placements are generally illiquid, meaning there are limited opportunities to resell the security. Risk of the underlying investment may be significantly higher than publicly traded investments.

## **Item 9 – Disciplinary Information**

Neither the firm nor any management person have been subject to any criminal or civil actions, administrative proceedings, or self-regulatory proceedings.

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

Neither Rock Creek or any of its management persons are registered as a broker-dealer or as a registered representative of a broker-dealer, nor does Rock Creek or any of its management persons have an application pending to register as a broker-dealer or as a registered representative of a broker-dealer.

Neither Rock Creek or any of its management persons are registered as a futures commission merchant, commodity pool operator, or a commodity trading advisor, nor does Rock Creek or any of its management persons have an application pending to become an associated firm or person of the foregoing entities.

Neither the firm nor any of its management persons has a material relationship with any of the following types of entities:

- Broker-dealer, municipal securities dealer, or government securities dealer or broker

- Investment company or other pooled investment vehicle (including mutual funds, closed-end investment companies, unit investment trusts, private investment company or “hedge fund” and offshore fund)
- Other investment adviser or financial planner
- Futures commission merchant, commodity pool operator, or commodity trading advisor
- Banking or thrift institution
- Accountant or accounting firm
- Lawyer or law firm
- Insurance company or agency
- Pension consultant
- Real estate broker or dealer
- Sponsor or syndicator of limited partnerships

Lewis Baker an independent insurance agent. In that capacity, he receives compensation for the sale of insurance products to Clients and other persons. Clients are not required to purchase any insurance products through Mr. Baker.

This represents a conflict of interest because it gives the representative an incentive to recommend products that may be based on the commission amount received rather than on the client’s needs. This conflict is mitigated by disclosures, procedures, and the firm’s fiduciary obligation to place the best interest of the Client first. Clients have the option to purchase these products through another insurance agent or registered representative of their choosing.

Rock Creek sometimes utilizes the services of a sub-advisor to manage Clients’ investment portfolios. Sub-advisors will maintain the models or investment strategies agreed upon between sub-advisor and Rock Creek. Sub-advisors execute all trades on behalf of Rock Creek in Client accounts. Rock Creek will be responsible for the overall relationship with the Client. Rock Creek retains the authority to terminate the sub-advisor relationship at Rock Creek’s discretion.

## **Item 11 – Code of Ethics**

The affiliated persons (affiliated persons include employees and/or independent contractors) of Rock Creek have committed to a Code of Ethics (“Code”). The purpose of our Code is to set forth standards of conduct expected of Rock Creek affiliated persons and addresses conflicts that may arise. The Code defines acceptable behavior for affiliated persons of Rock Creek. The Code reflects Rock Creek and its supervised persons’ responsibility to act in the best interest of their Client.

One area which the Code addresses is when affiliated persons buy or sell securities for their personal accounts and how to mitigate any conflict of interest with our Clients. We do

not allow any affiliated persons to use non-public material information for their personal profit or to use internal research for their personal benefit in conflict with the benefit to our Clients.

Rock Creek's policy prohibits any person from acting upon or otherwise misusing non-public or inside information. No advisory representative or other affiliated person, officer or director of Rock Creek may recommend any transaction in a security or its derivative to advisory Clients or engage in personal securities transactions for a security or its derivatives if the advisory representative possesses material, non-public information regarding the security.

Rock Creek's Code is based on the guiding principle that the interests of the Client are our top priority. Rock Creek and its representatives have a fiduciary duty to our Clients and must diligently perform that duty to maintain the complete trust and confidence of our Clients. When a conflict arises, it is our obligation to put the Client's interests over the interests of either affiliated persons or the company.

Rock Creek will provide a copy of the Code of Ethics to any Client or prospective Client upon request.

Rock Creek and its affiliated persons may buy or sell securities that are also held by Clients. In order to mitigate conflicts of interest such as trading ahead of Client transactions, affiliated persons are required to disclose all reportable securities transactions as well as provide Rock Creek with copies of their brokerage statements.

Additionally, because we may provide you investment advice pertaining to employee benefit plans, such as 401Ks, and individual retirement plans (IRAs)s, we must acknowledge our fiduciary status in writing under Title I of ERISA and the Internal Revenue Code, as applicable, when providing that advice. The following represents our written acknowledgement of fiduciary status:

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours.

Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;

- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

## **Item 12 – Brokerage Practices**

### The Custodian and Brokers We Use

Rock Creek does not maintain custody of clients' assets, although Rock Creek may be deemed to have custody of a client's assets if the client gives Rock Creek authority to withdraw assets from the client's account. Clients' assets must be maintained in an account at a Qualified Custodian ("QC"), generally a broker/dealer or bank. Your assets must be maintained in an account at a "qualified custodian," generally a broker/dealer or bank. We recommend that our clients use Fidelity Institutional<sup>SM</sup> ("FI"), which provides clearing, custody and other brokerage services through National Financial Services LLC and Fidelity Brokerage Services LLC, or Charles Schwab & Co. Inc. ("Schwab"). (We refer to the client's qualified custodian as a "QC".)

The QC will hold clients' assets in a brokerage account and buy and sell securities when Rock Creek instructs the QC to do so. While Rock Creek recommends that clients use one of the aforementioned as custodian/broker, a client will decide whether to do so and will open his/her account with a qualified custodian by entering into an account agreement directly with them. Rock Creek does not open the account for clients, although Rock Creek may assist clients in doing so. Not all advisors require their clients to use a particular broker-dealer or other custodian selected by the advisor. Even though clients' accounts are maintained at one of the aforementioned QCs, Rock Creek can still use other brokers to execute trades for the client's account as described below.

### How Rock Creek Selects Brokers/Custodians

Rock Creek seeks to recommend a custodian/broker who will hold client's assets and execute transactions on terms that are, overall, most advantageous when compared to other available providers and their services. Rock Creek considers a wide range of factors, including, among others:

- Combination of transaction execution services and asset custody services (generally without a separate fee for custody)
- Capability to execute, clear, and settle trades (buy and sell securities for a client's account)
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
- Breadth of available investment products (stocks, bonds, mutual funds, exchange-traded funds (ETF), etc.)

- Availability of investment research and tools that assist Rock Creek in making investment decisions.
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices
- Quality of services, reputation, financial strength, and stability
- Prior service to Rock Creek and its other clients
- Availability of other products and services that benefit Rock Creek, as discussed below.

#### Brokerage and Custody Costs Attributable to Clients

For our clients' accounts that a QC maintains, the QC generally does not charge clients separately for custody services but is compensated by charging the client commissions or other fees on trades that it executes or that settle into a client's QC account.

#### Products and Services Available to Rock Creek From QCs

QCs provide Rock Creek and its clients with access to institutional brokerage—trading, custody, reporting, and related services—many of which are not typically available to retail customers. QCs also make available various support services. Some of those services help Rock Creek manage or administer its clients' accounts, while others help Rock Creek manage and grow its business. QCs' support services generally are available on an unsolicited basis (Rock Creek doesn't have to request them) and at no charge to Rock Creek. Following is a more detailed description of QCs' support services:

*Services That Benefit Clients.* Institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available include some to which Rock Creek might not otherwise have access or that would require a significantly higher minimum initial investment by its clients. The services described in this paragraph generally benefit clients and their accounts.

*Services That May Not Directly Benefit Clients.* Other products and services are available to Rock Creek that benefit Rock Creek but may not directly benefit clients or their accounts. These products and services assist Rock Creek in managing and administering its clients' accounts. They include investment research, both a QC's own and that of third parties. Rock Creek uses this research to service all or a substantial number of its clients' accounts, including accounts not maintained at the QC. In addition to investment research, the QC also makes available software and other technology that:

- Provide access to client account data (such as duplicate trade confirmations and account statements)
- Facilitate trade execution and allocate aggregated trade orders for multiple client accounts
- Provide pricing and other market data
- Facilitate payment of fees charged by Rock Creek from its clients' accounts

- Assist with back-office functions, recordkeeping, and client reporting

*Services That Generally Benefit Only Rock Creek.* QCs also offer other services intended to help Rock Creek manage and further develop its business enterprise. These services include:

- Educational conferences and events
- Consulting on or assistance with technology, compliance, legal, and business needs
- Publications and conferences on practice management and business succession
- Access to employee benefits providers, human capital consultants, and insurance providers

A QC may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to Rock Creek. A QC may also discount or waive its fees for some of these services or pay all or a part of a third party's fees. A QC may also provide Rock Creek with other benefits, such as occasional business entertainment of Rock Creek personnel.

*Rock Creek Interest in a QC's Services.* The availability of these services benefits Rock Creek because the Firm does not have to produce or purchase them. Rock Creek does not have to pay for services so long as its clients collectively keep a minimum dollar amount of their assets in accounts at the QC. That minimum dollar amount may vary with each QC. Beyond that, these services are not contingent upon Rock Creek committing any specific amount of business to a QC in trading commissions or assets in custody. The applicable minimum may give Rock Creek an incentive to recommend that a client maintains his/her account with a particular QC, based on Rock Creek's interest in receiving services that benefit its business rather than based on a client's interest in receiving the best value in custody services and the most favorable execution of the client's transactions. This is a potential conflict of interest. Rock Creek believes, however, that its selection of a recommended QC as custodian and broker is in the best interests of its clients. Selection done by Rock Creek is primarily supported by the scope, quality, and price of services and not by the services that benefit only Rock Creek.

Soft dollar benefits are not limited to those clients who may have generated a particular benefit although certain soft dollar allocations are connected to particular clients or groups of clients. Soft dollar benefits are not proportionally allocated to any accounts that may generate different amounts of the soft dollar benefits.

*Trade Errors.* If a trade error occurs in a client account and it is Rock Creek's error, Rock Creek will correct the error, so the client account does not suffer a loss. However, it is possible that the client may not profit from the error, even if the correction results in a profit. For example, certain custodians keep all trade profits on an error regardless of how the error was caused.

*Block Trading (Mini Blocks) and Trade Allocations.* Rock Creek may "aggregate" or "block" purchases or sales of the same security for multiple accounts. Each account participating in

the block will receive the average price if multiple executions are required to complete the order. Rock Creek may block multiple client accounts together that qualify for prime brokerage trading activity. Participating clients will receive the average execution price and their pro rata share of transaction costs.

*Directed Brokerage.* In directing Rock Creek to use a specific custodian and/or broker/dealer (other than those recommended by Rock Creek) clients should understand that Rock Creek will not have the authority to negotiate commissions among various Custodians or obtain volume discounts. This may also affect our ability to achieve best execution.

## **Item 13 – Review of Accounts**

Account reviews are performed semi-annually by the Chief Compliance Officer of Rock Creek. Account reviews are performed more frequently when market conditions dictate, or upon changes in pertinent laws, or when the Client notifies Rock Creek of changes in the Client's situation. Financial plans generated are updated as requested by the Client and pursuant to a new or amended agreement. Rock Creek suggests updating annually or when the Client's situation changes.

A review of Client accounts may include, but are not limited to, a review of Client documented risk tolerance, ensuring accounts align with risk tolerance and goals, review target bands of each asset class to identify if there is an opportunity for rebalancing and review accounts at least once a year for tax loss harvesting opportunities.

Clients receive written account statements from the custodian no less than quarterly. Client receives confirmations of each transaction in account from Custodian(s) and an additional statement during any month in which a transaction occurs.

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

Rock Creek does not compensate for client referrals. No one who is not a client compensates Rock Creek or its representatives for the provision of investment advice.

## **Item 15 – Custody**

All assets are held at qualified custodians. The custodians provide account statements directly to Clients at their address of record at least quarterly. Clients are urged to compare the account statements received directly from their custodians to any documentation or reports prepared by Rock Creek and to notify us promptly of any discrepancy.

Rock Creek is deemed to have constructive custody of Client assets solely because advisory fees are directly deducted from Client's accounts by the custodian on behalf of Rock Creek.

## **Item 16 – Investment Discretion**

Rock Creek requests, but does not require Clients to grant, discretionary authority to manage the Client's securities accounts. If discretion is granted, Rock Creek has the authority to determine, without obtaining specific Client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. If applicable, Client will authorize Rock Creek discretionary authority to execute selected investment program transactions as stated within the Investment Advisory Agreement.

Rock Creek allows Clients to place restrictions on Rock Creek's discretionary authority. These restrictions must be provided to Rock Creek in writing. Rock Creek reserves the right to refuse to open an account, to reject any restriction, or to terminate an account if Rock Creek believes, in its sole discretion, that the restrictions sought are impractical or would limit its abilities to manage the account effectively and prudently. Clients should also understand that the imposition of portfolio restrictions will affect performance of the portfolio, either positively or negatively.

The Client approves the custodian to be used and the commission rates paid to the custodian. Rock Creek does not receive any portion of the transaction fees or commissions paid by the Client to the custodian.

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

Rock Creek does not vote proxies on securities. Clients are expected to vote their own proxies. The Client will receive their proxies directly from the custodian of their account or from a transfer agent.

When assistance on voting proxies is requested, Rock Creek will provide recommendations to the Client. If a conflict of interest exists, it will be disclosed to the Client.

## **Item 18 – Financial Information**

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about our financial condition. Rock Creek 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.

Rock Creek does not collect or require management fees, of any amount, six months or more in advance.



Lewis Baker  
Brochure Supplement

8607 Cedar Street  
Silver Spring, MD 20910  
202-899-1400  
March 31, 2022

This brochure provides information about the qualifications and business practices of Rock Creek Wealth Planners and Advisors, LLC. Being registered as a registered investment adviser does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us at: 202-899-1400. 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 Rock Creek Wealth Planners and Advisors, LLC (CRD #298104) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

## Item 2- Educational Background and Business Experience

Lewis Baker:

West Point United States Military Academy – Bachelor of Science in Management -  
Graduated in 1991. Has a Series 65 exam as well as is CFP, CEPA, Chartered CRFP

## Item 3- Disciplinary Information

Lewis Baker has not been subject to any criminal or civil actions, administrative proceedings, self-regulatory organization proceedings, revocations, or suspensions.

## Item 4- Other Business Activities

Lewis Baker's investment-related outside business activities are discussed in Item 10 above.

Mr. Baker is also a part of a management team for The Academy Fund as Director of National Accounts. He receives compensation based on his contribution of less than 10% of the total revenue. He spends less than 10% of his time on this function. Clients are not required to purchase this fund, but it is being disclosed due to potential conflict of interest.

## Item 5- Additional Compensation

Lewis Baker does not receive any other economic benefit from a non-client in connection with giving advice to clients.

## Item 6 - Supervision

Lewis Baker is the CCO of Rock Creek Wealth Planner and Advisors, LLC., and is responsible for the firm's policies and procedures. The telephone number for Lewis Baker is 202-899-1400.