

Dravo Bay LLC
dba
Blue Rock Financial Group

Form ADV Part 2A – Disclosure Brochure

Effective: August 24, 2023

This Form ADV 2A ("Disclosure Brochure") provides information about the qualifications and business practices of Dravo Bay LLC dba Blue Rock Financial Group ("Blue Rock Financial Group" or the "Advisor"). If you have any questions about the content of this Disclosure Brochure, please contact the Advisor at (302) PLANNER (752-6637).

Blue Rock Financial Group is a registered investment advisor with the U.S Securities Exchange Commission ("SEC"). The information in this Disclosure Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information through Blue Rock Financial Group to assist you in determining whether to retain the Advisor.

Additional information about Blue Rock Financial Group and its Advisory Persons is available on the SEC's website at www.adviserinfo.sec.gov by searching with the Advisor's firm name or CRD# 298558.

Dravo Bay LLC
37458 Oyster House Road, Rehoboth Beach, DE 19971
Phone: (302) PLANNER (752-6637) | Fax: (302) 351-6658
www.bluerockfg.com

Item 2 – Material Changes

Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplements")*. The Disclosure Brochure provides information about a variety of topics relating to an advisor's business practices and conflicts of interest. The Brochure Supplements provide information about Advisory Persons of Blue Rock Financial Group. For convenience, the Advisor has combined these documents into a single disclosure document.

Blue Rock Financial Group believes that communication and transparency are the foundation of its relationship with clients and will continually strive to provide you with complete and accurate information at all times. Blue Rock Financial Group encourages all current and prospective clients to read this Disclosure Brochure and discuss any questions you may have with the Advisor.

Material Changes

The following material changes have been made to this Disclosure Brochure since the last filing and distribution to Clients:

- The Advisor has amended Item 4 and Item 5 to add Disclosure around the use of Investment Platforms. Please see Items 4 and 5.
- The Advisor now offers robo-advisor services through a third-party Investment Platform. Please see Items 12 and 14 for more information.
- The Advisor has amended Item 8 to disclose that the principles of Modern Portfolio Theory are primarily used in determining investment strategies for Clients. Please see Item 8 for details.
- The Advisor has amended Item 5 to disclose a new maximum fee for Investment Management Services.

Future Changes

From time to time, the Advisor may amend this Disclosure Brochure to reflect changes in business practices, changes in regulations or routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to you annually and if a material change occurs in the business practices of Blue Rock Financial Group.

You may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with the Advisor's firm name or CRD# 298558. You may also request a copy of this Disclosure Brochure at any time, by contacting the Advisor at (302) PLANNER (752-6637).

Item 3 – Table of Contents

Item 1 – Cover Page	1
Item 2 – Material Changes	2
Item 3 – Table of Contents	3
Item 4 – Advisory Services	4
A. Firm Information	4
B. Advisory Services Offered	4
C. Client Account Management	6
D. Wrap Fee Programs	7
E. Assets Under Management	7
Item 5 – Fees and Compensation	7
A. Fees for Advisory Services	7
B. Fee Billing	8
C. Other Fees and Expenses	9
D. Advance Payment of Fees and Termination	10
E. Compensation for Sales of Securities	10
Item 6 – Performance-Based Fees and Side-By-Side Management	11
Item 7 – Types of Clients	11
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss	11
A. Methods of Analysis	11
B. Risk of Loss	11
Item 9 – Disciplinary Information	12
Item 10 – Other Financial Industry Activities and Affiliations	13
A. Code of Ethics	13
B. Personal Trading with Material Interest	13
C. Personal Trading in Same Securities as Clients	13
D. Personal Trading at Same Time as Client	13
Item 12 – Brokerage Practices	14
A. Recommendation of Custodian[s]	14
B. Aggregating and Allocating Trades	14
Item 13 – Review of Accounts	15
A. Frequency of Reviews	15
B. Causes for Reviews	15
C. Review Reports	15
Item 14 – Client Referrals and Other Compensation	15
A. Compensation Received by Blue Rock Financial Group	15
B. Compensation for Client Referrals	17
Item 15 – Custody	17
Item 16 – Investment Discretion	17
Item 17 – Voting Client Securities	17
Item 18 – Financial Information	17
Form ADV Part 2B – Brochure Supplements	18
Privacy Policy	28

Item 4 – Advisory Services

A. Firm Information

Dravo Bay LLC dba Blue Rock Financial Group (“Blue Rock Financial Group” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). The Advisor is organized as a limited liability company (“LLC”) under the laws of Delaware. Blue Rock Financial Group was founded in August 2018 and is owned and operated by Todd A. Roselle (Principal). This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by Blue Rock Financial Group.

For more information regarding this disclosure Brochure, please contact Kelly Kaczmarczyk, the Chief Compliance Officer, at (302) PLANNER (752-6637).

B. Advisory Services Offered

Blue Rock Financial Group offers advisory services to individuals, high net worth individuals, families, trusts, businesses and retirement plans (each referred to as a “Client”). Blue Rock Financial Group provides a comprehensive approach to its wealth advisory services. Services are tailored to the unique needs of each Client.

The Advisor serves as a fiduciary to Clients, as defined under the applicable laws and regulations. As a fiduciary, the Advisor upholds a duty of loyalty, fairness and good faith towards each Client and seeks to mitigate potential conflicts of interest. Blue Rock Financial Group’s fiduciary commitment is further described in the Advisor’s Code of Ethics. For more information regarding the Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

Investment Management Services

Blue Rock Financial Group provides customized wealth management solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary investment management and planning services. Blue Rock Financial Group works closely with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create an investment strategy. Blue Rock Financial Group customizes its investment management services for its Clients. Blue Rock Financial Group will implement the investment strategy with its internal management and/or the use of unaffiliated money managers or investment platforms (as described below).

Internal Investment Management – The Advisor’s investment philosophy is based primarily on modern portfolio theory. The Advisor will develop a strategic asset allocation for the Client based on the Client’s unique situation. The Advisor will then construct an investment portfolio primarily utilizing exchange-traded funds (“ETFs”). The Advisor may also incorporate open-end mutual funds, individual equity securities and/or individual fixed income securities in a Client’s portfolio. For mutual funds, the Advisor primarily selects passive managers and will seek institutional share classes when available.

Blue Rock Financial Group typically employs a long-term investment approach for Clients, but may buy, sell or re-allocate positions that have been held less than one year to meet the objectives of the Client or due to market conditions. Blue Rock Financial Group will construct, implement and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to acceptance by the Advisor.

At no time will Blue Rock Financial Group accept or maintain custody of a Client’s funds or securities, except for limited authority as outlined in Item 15 – Custody. All Client assets will be managed within their designated account[s] at the Custodian, pursuant to the advisory agreement. Please see Item 12 – Brokerage Practices.

Retirement Accounts – When deemed to be in the Client’s best interest, the Advisor will recommend that a Client take a distribution from an ERISA sponsored plan or to roll over the assets to an Individual Retirement Accounts (“IRAs”), or recommend a similar transaction including rollovers from one ERISA sponsored Plan to another, one IRA to another IRA, or from one type of account to another account (e.g. commission-based account to fee-based account). In such instances, the Advisor will serve as an investment fiduciary as that term is defined under The Employee Retirement Income Security Act of 1974 (“ERISA”) and/or the Internal Revenue Code (“IRC”), as applicable, which are laws governing retirement accounts. Such a recommendation creates a conflict of interest if the Advisor will earn a new (or increase its current)

advisory fee as a result of the transaction. No client is under any obligation to roll over a retirement account to an account managed by the Advisor.

Use of Independent Managers – Blue Rock Financial Group will recommend that Clients utilize one or more unaffiliated investment managers or investment platforms (collectively “Independent Managers”) available through SEI Private Trust Company (“SEI”) for all or a portion of a Client’s investment portfolio, based on the Client’s needs and objectives. In such instances, the Client will be required to authorize and enter into an investment management agreement with an Independent Manager that defines the terms in which the Independent Manager will provide its services. The Advisor will perform initial and ongoing oversight and due diligence over each Independent Manager to ensure the strategy remains aligned with Clients investment objectives and overall best interests. The Advisor will also assist the Client in the development of the initial policy recommendations and managing the ongoing Client relationship. The Client, prior to entering into an agreement with an Independent Manager, will be provided with the Independent Manager’s Form ADV Part 2A - Disclosure Brochure (or a brochure that makes the appropriate disclosures).

Investment Management Platforms

Advisor Guided Platform Services – Certain Client account[s] will be managed on the Advisor Guided platform, available through SEI, which provides efficient trading solutions.

Hero Wealth Management – Blue Rock Financial Group may recommend that certain Clients implement their investment portfolios through Betterment Institutional, a division of Betterment LLC (herein “Betterment Institutional” or the “Investment Platform”), for the Advisor’s Hero Wealth Management Service. Betterment Institutional is what is often termed a “robo-advisor”, an online wealth management service that provides automated, algorithm-based portfolio management advice. Robo-advisors use technology to deliver similar services as traditional advisors, but generally only offer portfolio management and do not get involved in a Client’s personal situation, such as taxes and retirement or estate planning.

Blue Rock Financial Group chose to affiliate with Betterment Institutional due to the Investment Platform’s customized portfolio allocations, automated rebalancing, and competitive fees. Blue Rock Financial Group utilizes Betterment Institutional as a complement to its comprehensive financial planning services to provide cost effective investing coupled with personalized financial planning.

To establish accounts with Betterment Institutional, the Client will also enter into one or more agreements with Betterment that provides the authority for discretionary investment management by the Investment Platform. Blue Rock Financial Group remains the Client’s primary advisor and relationship contact and will select or construct a portfolio of ETFs and/or cash equivalents from the universe of investments included on the Investment Platform. Blue Rock Financial Group will have the discretionary authority to instruct Betterment Institutional with respect to portfolio construction, asset allocation, and other investment decisions, subject to the limitations described herein. Betterment Institutional will implement the portfolio and be responsible for the discretionary trading of the ETFs in the Client’s portfolio, including the purchase and sale of investments and the automatic rebalancing back to targets.

Betterment Institutional utilizes between ten to twelve different ETF’s, representing various asset classes for the construction of investment portfolios. As discussed above, Blue Rock Financial Group will work with each Client to select/construct a portfolio to meets the needs of the Client. The Client has limited ability to put restrictions on its accounts. The account[s] cannot contain investments that are not included in the Betterment Institutional universe of ETFs and cash equivalents.

Betterment Institutional, under its discretionary authority, will automatically adjust and rebalance the Client’s accounts daily based on the drift tolerance established for the positions in the investment portfolio. The Advisor’s investment philosophy is long-term, but the Advisor may make such tactical overrides to take advantage of market pricing anomalies or strong market sectors. The Advisor does not actively trade in the Client’s account[s] and is also limited to a enter one allocation change per account per trading day through Betterment Institutional, the Client should be aware of these potential disadvantages.

For its services, Betterment Institutional will charge an asset-based fee that includes the securities transaction

fees for all trades. The Advisor will only charge the investment advisory fee detailed in Item 5.A. below on assets referred to Betterment Institutional and does not share in any fees earned by Betterment Institutional.

The Client, prior to entering into an agreement with the Investment Platform, will be provided with the Investment Platform's Form ADV Part 2A (or a brochure that makes the appropriate disclosures).

Financial Planning Services

Blue Rock Financial Group will typically provide to its Clients a variety of financial planning services. Such services may be included in the overall advisory services or contracted separately, based on the Client's needs and complexity of the services to be provided. Services may be provided in several areas of a Client's financial situation, depending on their goals and objectives. Planning or consulting may encompass one or more areas of need, including, but not limited to investment advice and planning, retirement planning, distributions, personal savings, education savings, spending, insurance needs, estate planning, charitable strategies, and other areas of a Client's financial situation. Blue Rock Financial Group may deliver specific planning modules to the Client or a comprehensive plan, based on the needs of the Client.

In certain circumstances, Blue Rock Financial Group may also refer Clients to an accountant, attorney or other specialist, as appropriate for the Client's unique situation. For certain financial planning engagements, the Advisor will generally provide a written report that contains observations and recommendations. For consulting or ad-hoc engagements, the Advisor may not provide a written summary. Plans or consultations are typically completed within six months of contract date, assuming all information and documents requested are provided promptly.

Financial planning recommendations pose a conflict between the interests of the Advisor and the interests of the Client. For example, the Advisor has an incentive to recommend that Clients engage the Advisor for investment management services or to increase the level of investment assets with the Advisor, as it would increase the amount of advisory fees paid to the Advisor. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to implement the transaction through the Advisor. Financial planning services may be included in an overall wealth management engagement or provided as a separate service, pursuant to the terms of the agreement with the Client.

Retirement Plan Advisory Services

Blue Rock Financial Group provides retirement plan advisory services on behalf of retirement plans (each a "Plan") and the company (the "Plan Sponsor"). The Advisor's retirement plan advisory services are designed to assist the Plan Sponsor in meeting its fiduciary obligations to the Plan and its Plan Participants. Each engagement is customized to the needs of the Plan and Plan Sponsor. Services generally include:

- Vendor Analysis
- Plan Participant Enrollment and Education Tracking
- Investment Policy Statement ("IPS") Design and Monitoring
- Investment Oversight Services (ERISA 3(21))
- Performance Reporting
- Ongoing Investment Recommendation and Assistance
- ERISA 404(c) Assistance

These services are provided by Blue Rock Financial Group serving in the capacity as a fiduciary under the Employee Retirement Income Security Act of 1974, as amended ("ERISA"). In accordance with ERISA Section 408(b)(2), the Plan Sponsor is provided with a written description of the Advisor's fiduciary status, the specific services to be rendered and all direct and indirect compensation the Advisor reasonably expects under the engagement.

C. Client Account Management

Prior to engaging Blue Rock Financial Group to provide advisory services, each Client is required to enter into one or more agreements with the Advisor that define the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Strategy – Blue Rock Financial Group will work with each Client to develop a custom investment strategy designed in connection with the Client's investment goals and objectives.
- Asset Allocation – Blue Rock Financial Group will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance for risk for each Client.
- Portfolio Construction – Blue Rock Financial Group will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – Blue Rock Financial Group will provide investment management and ongoing oversight of the Client's investment portfolio.

D. Wrap Fee Programs

Blue Rock Financial Group does not manage or place Client assets into a wrap fee program.

E. Assets Under Management

As of December 31, 2022, Blue Rock Financial Group manages \$207,300,100 in Client assets, \$148,880,629 of which are managed on a discretionary basis and \$58,419,471 on a non-discretionary basis. Clients may request more current information at any time by contacting the Advisor.

Item 5 – Fees and Compensation

The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client engaging the Advisor for services described herein shall be required to enter into a written agreement with the Advisor.

A. Fees for Advisory Services

Investment Management Services

Investment advisory fees are paid quarterly, at the end of each calendar quarter, pursuant to the terms of the investment advisory agreement. Fees are based on the closing market value of the assets under management in the account[s] and the end of the quarter based on the following schedule:

Assets Under Management	Maximum Annual Fee (%)
Up to \$1,000,000	1.50%
\$1,000,001 to \$2,000,000	1.05%
\$2,000,001 to \$3,000,000	0.92%
\$3,000,001 to \$4,000,000	0.79%
\$4,000,001 to \$5,000,000	0.66%
\$5,000,001 to \$7,500,000	0.54%
Over \$7,500,000	0.39%

The investment advisory fee in the first quarter of service is prorated from the inception date of the Client's account[s] to the end of the first quarter. Fees may be negotiable at the sole discretion of the Advisor. The Client's fees will take into consideration the aggregate assets under management with the Advisor. All securities held in accounts managed by Blue Rock Financial Group will be independently valued by the Custodian. The Advisor will conduct periodic reviews of the Custodian's valuations.

Clients may make additions to and withdrawals from their account[s] at any time, subject to Blue Rock Financial Group's right to terminate an account. Additions may be in cash or securities provided that Blue Rock Financial Group reserves the right to liquidate any transferred securities or decline to accept particular securities into a Client's account[s]. Clients may withdraw account assets on notice to Blue Rock Financial Group, subject to the usual and customary securities settlement procedures. However, Blue Rock Financial Group designs its portfolios as long-term investments and the withdrawal of assets may impair the achievement of a Client's investment objectives. Blue Rock Financial Group may consult with its Clients about the options and ramifications of transferring securities. However, Clients are advised that when transferred securities are liquidated, they are subject to transaction fees, fees assessed at the mutual fund level (i.e. contingent deferred sales charge) and/or tax ramifications.

Use of Independent Managers

As noted in Item 4, the Advisor will implement all or a portion of a Client's investment portfolio utilizing one or more Independent Managers. To eliminate any conflict of interest, the Advisor does not earn any compensation from an Independent Manager. The Advisor will only earn its investment advisory fee as described above. Independent Managers typically do not offer any fee discounts but may have a breakpoint schedule which will reduce the fee with an increased level of assets placed under management with an Independent Manager. The terms of such fee arrangements are included in the Independent Manager's disclosure brochure and applicable contract[s] with the Independent Manager. The total blended fee, including the Advisor's fee and the Independent Manager's fee, will not exceed 2.50% annually. The Advisor's fee is exclusive of, and in addition to any applicable securities transaction and custody fees, and other related costs and expenses described in Item 5.C. below, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs. For certain Clients, financial planning services are included in investment advisory fee.

Investment Management Platform

Advisor Guided Platform Services – Advisor Guided platform services fees are paid quarterly, at the end of each calendar quarter, pursuant to the terms of the investment advisory agreement. Fees are based on the closing market value of the assets under management in the account[s] and the end of the quarter based on the following schedule:

Assets Under Management	Annual Fee (%)
Up to \$1,000,000	0.16%
\$1,000,001 to \$2,000,000	0.14%
\$2,000,001 to \$3,000,000	0.12%
\$3,000,001 to \$4,000,000	0.08%
\$4,000,001 to \$5,000,000	0.05%
\$5,000,001 to \$7,500,000	0.02%
Over \$7,500,000	0.00%

Hero Wealth Management – Assets on the Betterment Institutional Platform will be charged the Advisor's investment advisory fee of .75% annually, as well as the Betterment Institutional platform fee, collected monthly in arrears. As noted above in Item 4, the Client's fee charged by Betterment Institutional includes securities transaction fees for implementing and rebalancing the Client's account[s]. Blue Rock Financial Group does not earn any compensation from Investment Platforms and will only receive its own advisory fee for assets referred to an Investment Platform. Fees are detailed in the agreement between the Client and Betterment Institutional. The Advisor will provide the Client with Betterment Institutional's Form ADV 2A – Disclosure Brochure or similar disclosures regarding fees.

Financial Planning Services

Blue Rock Financial Group offers financial planning services through several types of engagement methods. The Advisor may offer its services on an hourly basis, a fixed project fee or an annual/ongoing engagement. Hourly engagements are billed at a rate ranging from \$350 to \$500, based on the complexity of the services to be provided and the experience level of the Advisory Person. Fixed fee engagements are negotiated based on the expected number of hours to complete the engagement at the negotiated hourly rate. Annual ongoing engagements start with a financial plan that is billed for a fixed fee ranging from \$1,500 to \$24,000, depending on the scope and complexity of the Client engagement. After the delivery of the initial financial plan, the ongoing fee ranges from \$100 to \$2,000 per month, based on the complexity and scope of the ongoing services. Fees may be negotiable at the sole discretion of the Advisor. An estimate for total hours and/or costs will be provided to the Client prior to engaging for these services.

Retirement Plan Advisory Services

Fees for retirement plan advisory services are charged an annual asset-based fee of up to 1.20% and are billed monthly at the end of the calendar quarter, pursuant to the terms of the retirement plan advisory agreement. Fees may be negotiable depending on the size and complexity of the Plan.

The Plan will also pay the Advisor an additional advisory fee on an ongoing annual basis. This fee is charged in arrears of the retirement plan advisory services agreement anniversary date. This fee covers the installation costs of the plan and the ongoing advisory service until the plan reaches a certain threshold. The Advisor will provide the Client a written invoice

itemizing the fee. The annual fee is based on the following tiered fee schedule:

Assets Under Management	Annual Fee (\$)
Up to \$500,000	\$2,500
\$500,001 to \$1,000,000	\$1,250
\$1,000,001 & Above	\$0

B. Fee Billing

Investment Management Services

Investment advisory fees are calculated by the Advisor or its delegate and deducted from the Client's account[s] at the Custodian. The Advisor or its delegate shall provide the Custodian with an invoice instructing the Custodian to deduct its investment advisory fee. The amount due is calculated by applying the quarterly rate (annual rate divided by four) to the assets under management at the end of the quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the investment advisory fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the Custodian's brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting Blue Rock Financial Group to be paid directly from their account[s] held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.

Use of Independent Managers

For Client accounts implemented through an Independent Manager, the Client's overall fees will include Blue Rock Financial Group's investment advisory fee (as noted above) plus investment management fees and/or platform fees charged by the Independent Manager. The Independent Manager will assume the responsibility for calculating the Client's fees and deducting all fees from the Client's account[s].

Hero Wealth Management – Betterment fees and Blue Rock Financial Group fees are separately billed and deducted from the Client's account[s]. These fees consist of the Advisor's investment advisory fee, the Investment Platform's investment management fee, and any securities transaction fees charged by the Investment Platform.

Financial Planning Services

Fees for project-based hourly and fixed fee financial planning engagements may be invoiced up to fifty percent (50%) of the expected total engagement fee upon execution of the financial planning agreement. The balance shall be invoiced upon completion of the agreed upon deliverable[s]. Fees for annual/ongoing financial planning engagements may require an initial deposit or the initial financial planning fee to be paid in full at the start of the engagement. Upon completion of the engagement deliverable[s], the remaining balance of the engagement fees [if any] shall be invoiced by the Advisor and are due upon receipt of the invoice. If the Client is engaging for ongoing financial planning services, ongoing planning fees shall commence at the start of the following month and billed thereafter on a monthly basis, in advance of each month. Certain Clients may have their planning fees included with their overall investment advisory fees. The Advisor does not collect advance fees of \$1,200 or more for any services that will be completed six (6) months or more in advance.

Retirement Plan Advisory Services

Retirement plan advisory fees may be directly invoiced to the Plan Sponsor or deducted from the assets of the Plan, depending on the terms of the retirement plan advisory agreement.

C. Other Fees and Expenses

Clients may incur certain fees or charges imposed by third parties, other than Blue Rock Financial Group, in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all securities execution and custody fees charged by the Custodian, as applicable. Certain custodians recommended by the Advisor do not charge securities transaction fees for ETF and equity trades in a Client's account, provided that the account meets the terms and conditions of the Custodian's brokerage requirements. However, custodians typically charge for mutual funds and other types of investments. The fees charged by Blue Rock Financial Group are separate and distinct from these custody and execution fees.

In addition, all fees paid to Blue Rock Financial Group for investment advisory services are separate and distinct from the expenses charged by mutual funds and ETFs to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund

expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client may be able to invest in these products directly, without the services of Blue Rock Financial Group, but would not receive the services provided by Blue Rock Financial Group which are designed, among other things, to assist the Client in determining which products or services are most appropriate for each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by Blue Rock Financial Group to fully understand the total fees to be paid. Please refer to Item 12 – Brokerage Practices for additional information.

D. Advance Payment of Fees and Termination

Investment Management Services

Blue Rock Financial Group is compensated for its investment advisory services at the end of the quarter after investment advisory services are rendered. Either party may terminate the investment advisory agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the investment advisory agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. The Client's investment advisory agreement with the Advisor is non-transferable without the Client's prior consent.

Use of Independent Managers

In the event that a Client should wish to terminate their relationship with an Independent Manager, the terms for termination will be set forth in the respective agreements between the Client and that Independent Manager. Blue Rock Financial Group will assist the Client with the termination and transition as appropriate.

Hero Wealth Management – The Client may terminate the account[s] with the Investment Platform, at any time, by providing advance written notice to the Investment Platform. The Client may be subject to other terms as provided through the tri-party agreement with the Investment Platform.

Financial Planning Services

Blue Rock Financial Group may be partially compensated for its financial planning services in advance of providing services. Either party may terminate the financial planning agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the financial planning agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Upon termination, the Client shall be responsible for planning fees based on the hours incurred or in the event of a fixed fee, the percentage of the engagement completed. For ongoing planning services, fees are prorated up to and including the effective day of termination. The initial planning fee is based on a percentage of the plan completed. Upon termination, the Client shall be billed for actual hours logged on the planning project times the contractual hourly rate or in the case of a fixed fee engagement, the percentage of the engagement scope completed by the Advisor. The Advisor will refund any unearned, prepaid financial planning fees from the effective date of termination. The Client's financial planning agreement with the Advisor is non-transferable without the Client's prior consent.

Retirement Plan Advisory Services

Blue Rock Financial Group is compensated for its services at the end of the month, after services are rendered. Either party may request to terminate the retirement plan advisory agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the retirement plan advisory agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide retirement plan advisory services rendered to the point of termination and such fees shall be due and payable by the Client. The Client's retirement plan advisory agreement with the Advisor is non-transferable without the Client's prior consent.

E. Compensation for Sales of Securities

Blue Rock Financial Group does not buy or sell securities to earn commissions and does not receive any compensation for securities transactions in any Client account, other than the investment advisory fees noted above.

Mr. Roselle is also a registered representative of Purshe Kaplan Sterling Investments, Inc. ("PKS"). PKS is a registered broker-dealer (CRD No. 35747) member FINRA, SIPC. In one's separate capacity as a registered representative of PKS, Mr. Roselle will implement securities transactions under PKS and not through Blue Rock Financial Group. In such

instances, Mr. Roselle will receive commission-based compensation in connection with the purchase and sale of securities, including 12b-1 fees for the sale of investment company products. Compensation earned by the Mr. Roselle in his capacity as a registered representative is separate and in addition to the Advisor's fees. This practice presents a conflict of interest because the Mr. Roselle who is a registered representative has an incentive to effect securities transactions for the purpose of generating commissions rather than solely based on the Client. Clients are not obligated to implement any recommendation provided by the Advisor nor Mr. Roselle. Neither the Advisor nor Mr. Roselle will earn ongoing investment advisory fees in connection with any products or services implemented in Mr. Roselle's separate capacity as a registered representative. Please see Item 10 – Other Financial Industry Activities and Affiliations.

Mr. Roselle is also licensed as an independent insurance professional. As an independent insurance professional, Mr. Roselle will earn commission-based compensation for selling insurance products, including insurance products he sells to Clients. Insurance commissions earned by Mr. Roselle are separate and in addition to advisory fees. This practice presents a conflict of interest because a person providing investment advice on behalf of the Advisor who is also an insurance agent has an incentive to recommend insurance products to Clients for the purpose of generating commissions rather than solely based on Client needs. However, Clients are under no obligation, contractually or otherwise, to purchase insurance products through Mr. Roselle. Please see Item 10 – Other Financial Industry Activities and Affiliations.

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

Blue Rock Financial Group does not charge performance-based fees for its investment advisory services. The fees charged by Blue Rock Financial Group are as described in Item 5 above and are not based upon the capital appreciation of the funds or securities held by any Client.

Blue Rock Financial Group does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

Item 7 – Types of Clients

Blue Rock Financial Group offers advisory services to individuals, high net worth individuals, families, trusts, businesses and retirement plans. Blue Rock Financial Group generally does not impose a minimum size for establishing a relationship. However, certain investments and strategies may require certain minimums for effective implementation.

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

A. Methods of Analysis

Blue Rock Financial Group primarily employs the principles of Modern Portfolio Theory in determining investment strategies for its Clients. Research and analysis from Blue Rock Financial Group are derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

Modern Portfolio Theory is a theory of investment which tries to attain portfolio expected return for a given amount of portfolio risk, or equivalently reduce risk for a given level of expected return, by carefully choosing the proportions of various assets. Please note that there is no investment strategy that will guarantee a profit or prevent loss.

As noted above, Blue Rock Financial Group generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. Blue Rock Financial Group will typically hold all or a portion of a security for more than a year, but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, Blue Rock Financial Group may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector or asset class.

B. Risk of Loss

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. Blue Rock Financial Group will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

While the methods of analysis help the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in these methods of analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account[s]. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. Following are some of the risks associated with the Advisor's investment approach:

Market Risks

The value of a Client's holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad. This risk is linked to the performance of the overall financial markets.

ETF Risks

The performance of ETFs is subject to market risk, including the possible loss of principal. The price of the ETFs will fluctuate with the price of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs have a large bid-ask spread and low trading volume. The price of an ETF fluctuates based upon the market movements and may dissociate from the index being tracked by the ETF or the price of the underlying investments. An ETF purchased or sold at one point in the day may have a different price than the same ETF purchased or sold a short time later.

Mutual Fund Risks

The performance of mutual funds is subject to market risk, including the possible loss of principal. The price of the mutual funds will fluctuate with the value of the underlying securities that make up the funds. The price of a mutual fund is typically set daily therefore a mutual fund purchased at one point in the day will typically have the same price as a mutual fund purchased later that same day.

Individual Securities Risks

Owning individual equity or fixed income securities may result in additional risks, such as the performance of an individual company or the comparison of the company against its peers, industry or the market in general. Investor sentiment can influence the valuation of such securities. For individual bonds, interest rate risk and reinvestment risk may also be present as interest rates will fluctuate over time.

Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.

Item 9 – Disciplinary Information

There are no legal, regulatory or disciplinary events involving Blue Rock Financial Group or its owner. Blue Rock Financial Group values the trust Clients place in the Advisor. The Advisor encourages Clients to perform the requisite due diligence on any advisor or service provider that the Client engages. The backgrounds of the Advisor and its Advisory Persons are available on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with the Advisor's firm name or CRD# 298558.

Item 10 – Other Financial Industry Activities and Affiliations

Broker-Dealer Affiliation

As noted in Item 5, Mr. Roselle is also a registered representative of PKS. PKS is a registered broker-dealer, member FINRA, SIPC. In one's separate capacity as a registered representative, Mr. Roselle will receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Roselle. Neither the Advisor nor Mr. Roselle will earn ongoing investment advisory fees in connection with any services implemented in Mr. Roselle's separate capacity as a registered representative.

Insurance Agency Affiliations

As noted in Item 5, Mr. Roselle is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from one's role with Blue Rock Financial Group. As an insurance professional, Mr. Roselle will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Roselle is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Roselle or the Advisor.

Use of Independent Managers

As noted in Item 4, the Advisor may implement all or a portion of a Client's investment portfolio with one or more Independent Managers. The Advisor does not receive any compensation nor does this present a material conflict of interest. The Advisor will only earn its investment advisory fee as described in Item 5.A.

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

A. Code of Ethics

Blue Rock Financial Group has implemented a Code of Ethics that defines the Advisor's fiduciary commitment to each Client. This Code of Ethics applies to all persons associated with Blue Rock Financial Group ("Supervised Persons"). The Code of Ethics was developed to provide general ethical guidelines and specific instructions regarding the Advisor's duties to the Client. Blue Rock Financial Group and its personnel owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of Blue Rock Financial Group associates to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code of Ethics covers a range of topics that address ethics and conflicts of interest. To request a copy of the Code, please contact the Advisor at (302) PLANNER (752-6637).

B. Personal Trading with Material Interest

Blue Rock Financial Group allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Blue Rock Financial Group does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund, or advise an investment company. Blue Rock Financial Group does not have a material interest in any securities traded in Client accounts.

C. Personal Trading in Same Securities as Clients

Blue Rock Financial Group allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities that are recommended (purchase or sell) to Clients presents a conflict of interest that, as fiduciaries, must be disclosed to Clients and mitigated through policies and procedures. As noted above, the Advisor has adopted a Code of Ethics, which addresses insider trading (material non-public information controls) and personal securities reporting procedures. When trading for personal accounts, Supervised Persons have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by Blue Rock Financial Group requiring reporting of personal securities trades by its Supervised Persons for review by the Chief Compliance Officer ("CCO") or delegate. The Advisor has also adopted written policies and procedures to detect the misuse of material, non-public information.

D. Personal Trading at Same Time as Client

While Blue Rock Financial Group allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterward. **At no time will any associated person of Blue Rock Financial Group, transact in any security to the detriment of any Client.**

Item 12 – Brokerage Practices

A. Recommendation of Custodian[s]

Blue Rock Financial Group does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The Client will engage the broker-dealer/custodian (herein the “Custodian”) to safeguard Client assets and authorize Blue Rock Financial Group to direct trades to the Custodian as agreed in the investment advisory agreement. Further, Blue Rock Financial Group does not have the discretionary authority to negotiate commissions on behalf of Clients on a trade-by-trade basis.

Where Blue Rock Financial Group does not exercise discretion over the selection of the Custodian, it may recommend the Custodian[s] to Clients for custody and execution services. Clients are not obligated to use the Custodian recommended by Blue Rock Financial Group, and will not incur any extra fee or cost associated with using a custodian not recommended by Blue Rock Financial Group. However, the Advisor may be limited in the services it can provide if the recommended Custodian is not engaged. Blue Rock Financial Group may recommend the Custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, its reputation and/or the location of the Custodian’s offices. As its Advisory Persons are also registered representatives of PKS, Blue Rock Financial Group and its Advisory Persons are limited in the Custodians in which they can recommend to Clients.

Blue Rock Financial Group will generally recommend that Clients establish their account[s] at SEI Private Trust Company, a subsidiary of SEI Investments Company (“SEI”), or Charles Schwab & Co., Inc. (“Schwab”), a FINRA-registered broker-dealer and member SIPC. SEI or Schwab will serve as the Client’s “qualified custodian”.

The Advisor will also recommend that Clients use MTG, LLC dba Betterment Securities (“Betterment Securities”), a FINRA-registered broker-dealer and member SIPC, to manage Client assets on the Betterment Institutional platform for Clients who select the Hero Wealth Management Service.

Blue Rock Financial Group maintains an institutional relationship with SEI, Schwab, and Betterment Securities, whereby the Advisor receives economic benefits from SEI, Schwab, and Betterment Securities. Please see Item 14 below.

Following are additional details regarding the brokerage practices of the Advisor:

1. Soft Dollars – Soft dollars are revenue programs offered by broker-dealers/custodians whereby an advisor enters into an agreement to place security trades with a broker-dealer/custodian in exchange for research and other services. Blue Rock Financial Group **does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodian.**

2. Brokerage Referrals – Blue Rock Financial Group does not receive any compensation from any third party in connection with the recommendation for establishing an account.

3. Directed Brokerage – All Clients are serviced on a “directed brokerage basis”, where Blue Rock Financial Group will place trades within the established account[s] at the Custodian designated by the Client. Further, all Client accounts are traded within their respective account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor’s own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client’s account[s]). Blue Rock Financial Group will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the Custodian.

B. Aggregating and Allocating Trades

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4)

confidentiality and 5) skill required. Blue Rock Financial Group will execute its transactions through the Custodian, unless otherwise instructed in writing by the Client.

Blue Rock Financial Group may aggregate orders in a block trade or trades when securities are purchased or sold through the Custodian for multiple (discretionary) accounts. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage particular Clients' accounts.

Item 13 – Review of Accounts

A. Frequency of Reviews

Securities in Client accounts are monitored on a regular and continuous basis by Kelly Kaczmarczyk, Chief Compliance Officer of Blue Rock Financial Group. The CCO also has oversight of investment advisory processes. Formal reviews are generally conducted at least annually or more frequently depending on the needs of the Client. Clients are offered an annual financial plan, subject to scope of their agreement with the Advisor.

B. Causes for Reviews

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account[s]. The Client is encouraged to notify Blue Rock Financial Group if changes occur in the Client's personal financial situation that might adversely affect the Client's investment plan. Additional reviews may be triggered by material market, economic or political events.

C. Review Reports

The Client will receive brokerage statements no less than quarterly from the Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

Item 14 – Client Referrals and Other Compensation

A. Compensation Received by Blue Rock Financial Group

Blue Rock Financial Group does not receive securities commissions from product sponsors, broker-dealers or any unrelated third party. Blue Rock Financial Group may refer Clients to various third parties to provide certain financial services necessary to meet the goals of its Clients. Likewise, Blue Rock Financial Group may receive referrals of new Clients from a third-party.

Participation in Institutional Advisor Platform

Blue Rock Financial Group has established an institutional relationship with SEI ("Custodian") to assist the Adviser in managing Client account[s]. Access to the SEI platform is provided at no charge to the Adviser. The Adviser receives access to software and related support without cost because the Adviser renders investment management services to Clients that maintain assets at SEI. The software and related systems support may benefit the Adviser, but not its Clients directly. In fulfilling its duties to its Clients, the Adviser endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a Custodian creates a conflict of interest since these benefits may influence the Adviser's recommendation of this Custodian over one that does not furnish similar software, systems support, or services.

Participation in Institutional Advisor Platform

Blue Rock Financial Group has established an institutional relationship with Schwab through its "Schwab Advisor Services" unit, a division of Schwab dedicated to serving independent advisory firms like Blue Rock Financial Group. As a registered investment advisor participating on the Schwab Advisor Services platform, Blue Rock Financial Group receives access to software and related support without cost because the Advisor renders investment management services to

Clients that maintain assets at Schwab. Services provided by Schwab Advisor Services benefit the Advisor and many, but not all services provided by Schwab will benefit Clients. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a custodian creates a conflict of interest since these benefits may influence the Advisor's recommendation of this custodian over one that does not furnish similar software, systems support, or services.

Services that Benefit the Client – Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of Client's funds and securities. Through Schwab, the Advisor may be able to access certain investments and asset classes that the Client would not be able to obtain directly or through other sources. Further, the Advisor may be able to invest in certain mutual funds and other investments without having to adhere to investment minimums that might be required if the Client were to directly access the investments.

Services that May Indirectly Benefit the Client – Schwab provides participating advisors with access to technology, research, discounts and other services. In addition, the Advisor receives duplicate statements for Client accounts, the ability to deduct advisory fees, trading tools, and back-office support services as part of its relationship with Schwab. These services are intended to assist the Advisor in effectively managing accounts for its Clients, but may not directly benefit all Clients.

Services that May Only Benefit the Advisor – Schwab also offers other services and support to Blue Rock Financial Group that may not benefit the Client, including: educational conferences and events, consulting services and discounts for various service providers. Access to these services creates a financial incentive for the Advisor to recommend Schwab, which results in a conflict of interest. Blue Rock Financial Group believes, however, that the selection of Schwab as Custodian is in the best interests of its Clients.

Investment Management Platform

As noted in Item 12, the Advisor has also established an institutional relationship with Betterment Securities under an investment and advice platform, Betterment Institutional. Betterment Institutional makes available various support services to help manage or administer Client account[s], Betterment Institutional support services are generally available on an unsolicited basis and come at no cost to the Advisor. The following are the benefits Betterment Institutional support services may provide:

Investment Products – Betterment Institutional includes access to a range of investment products, execution of securities transactions, basic account aggregation, planning tools and custody of client assets through Betterment Securities.

Direct Benefits – Betterment Institutional may provide Clients with online tools to project expected returns, plan for retirement, understand risk, access information related to transactions, and review prior performance.

Indirect Benefits – Betterment Institutional may provide the Advisor with benefits that may not directly benefit the Client. These products and Services assist the Advisor by providing technology to better monitor and administer Client account[s]. This software and technology may:

- Assist with back-office functions, recordkeeping, and client reporting of Client account[s]
- Provide access to Client account[s] data (such as duplicate trade confirmation and account statements)
- Provide pricing and other market data
- Assist with back-office functions, recordkeeping, and client reporting

Advisor Benefits – The Advisor may be offered other services, which will help manage and further develop business enterprise. These services include:

- Educational conferences and events
- Consulting on technology, compliance, legal, and business needs
- Publications and conferences on practice management and business succession.

Also, as noted in Item 4, the Advisor may implement all or a portion of a Client's investment portfolio with one or more Investment Platforms. To eliminate any conflict of interest, the Advisor does not earn any compensation from an

Investment Platform[s]. The Advisor will only receive its own investment advisory fee for assets referred to an Investment Platform.

B. Compensation for Client Referrals

Certain Clients may be referred to the Advisor by either an affiliated or unaffiliated party (herein "Promoter") and receive, directly or indirectly, compensation for the Client referral. In such instances, the Advisor will compensate the Promoter a fee in accordance with Rule 206(4)-1 of the Advisers Act and any corresponding state securities requirements. Any such compensation shall be paid solely from the investment advisory fees earned by the Advisor, and shall not result in any additional charge to the Client.

Item 15 – Custody

Blue Rock Financial Group does not accept or maintain custody of any Client accounts, except for the authorized deduction of the Advisor's fee. All Clients must place their assets with a "qualified custodian". Clients are required to engage the Custodian to retain their funds and securities and direct Blue Rock Financial Group to utilize the Custodian for the Client's security transactions. Blue Rock Financial Group encourages Clients to review statements provided by the Custodian. For more information about custodians and brokerage practices, see Item 12 – Brokerage Practices.

Item 16 – Investment Discretion

Blue Rock Financial Group generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by Blue Rock Financial Group. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an Investment Advisory Agreement containing all applicable limitations to such authority. All discretionary trades made by Blue Rock Financial Group will be in accordance with each Client's investment objectives and goals. For Clients with account[s] established at an Independent Manager, those account[s] will also be managed by those parties on a discretionary basis.

Item 17 – Voting Client Securities

Blue Rock Financial Group does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

Item 18 – Financial Information

Neither Blue Rock Financial Group, nor its management, have any adverse financial situations that would reasonably impair the ability of Blue Rock Financial Group to meet all obligations to its Clients. Neither Blue Rock Financial Group, nor any of its Advisory Persons, have been subject to a bankruptcy or financial compromise. Blue Rock Financial Group is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect advance fees of \$1,200 or more for services to be performed six months or more in the future.

Form ADV Part 2B – Brochure Supplement

for

**Todd A. Roselle, CFP®, ChFC®
Principal**

Effective: August 24, 2023

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of Todd A. Roselle, CFP®, ChFC® (CRD# 5001611) in addition to the information contained in the Dravo Bay LLC ("Blue Rock Financial Group" or the "Advisor", CRD# 298558) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the content of the Blue Rock Financial Group Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (302) PLANNER (752-6637).

Additional information about Mr. Roselle is available on the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 5001611.

Item 2 – Educational Background and Business Experience

Todd A. Roselle, CFP®, ChFC®, born in 1977, is dedicated to advising Clients of Blue Rock Financial Group as its Principal and Chief Compliance Officer. Mr. Roselle earned his Masters Degree from Wilmington University in 2005 as well as his Bachelors Degree in 2003. In addition, Mr. Roselle earned an Associates Degree from Delaware Technical Community College in 2000. Additional information regarding Mr. Roselle's employment history is included below.

Employment History:

Principal and Chief Compliance Officer, Dravo Bay LLC [dba Blue Rock Financial Group]	09/2018 to Present
Registered Representative, Purshe Kaplan Sterling Investments, Inc.	09/2018 to Present
Financial Advisor, Cambridge Investment Research, Inc.	12/2012 to 09/2018
Financial Advisor, Securian Financial Services, Inc.	07/2005 to 12/2012

CERTIFIED FINANCIAL PLANNER™ (“CFP®”)

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP® (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP® Board”). The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- *Education* – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP® Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP® Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- *Examination* – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- *Experience* – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- *Ethics* – Agree to be bound by CFP® Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- *Continuing Education* – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- *Ethics* – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP® Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Chartered Financial Consultant® (ChFC®)

The Chartered Financial Consultant® (ChFC®) program prepares you to meet the advanced financial planning needs of individuals, professionals and small business owners. You'll gain a sustainable advantage in this competitive field with in-depth coverage of the key financial planning disciplines, including insurance, income taxation, retirement planning, investments and estate planning. The ChFC® requires three years of full-time, relevant business experience, nine two-hour course specific proctored exams, and 30 hours of continuing education every two years. Holders of the ChFC® designation must adhere to The American College's Code of Ethics.

Program Objectives:

- Function as an ethical, competent and articulate practitioner in the field of financial planning
- Utilize the intellectual tools and framework needed to maintain relevant and current financial planning knowledge and strategies.
- Apply financial planning theory and techniques through the development of case studies and solutions.
- Apply in-depth knowledge in a holistic manner from a variety of disciplines; namely, estate planning, retirement planning or non-qualified deferred compensation.

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Roselle. Mr. Roselle has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Roselle. Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices.

As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Roselle. However, the Advisor encourages Clients to independently view the background of Mr. Roselle on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 5001611.

Item 4 – Other Business Activities

Broker-Dealer Affiliation

Mr. Roselle is also a registered representative of Purshe Kaplan Sterling Investments, Inc. ("PKS"). PKS is a registered broker-dealer (CRD# 35747), member FINRA, SIPC. In Mr. Roselle's separate capacity as a registered representative, Mr. Roselle will receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Roselle. Neither the Advisor nor Mr. Roselle will earn ongoing investment advisory fees in connection with any products or services implemented in Mr. Roselle's separate capacity as a registered representative.

Insurance Agency Affiliations

Mr. Roselle is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart Mr. Roselle's role with Blue Rock Financial Group. As an insurance professional, Mr. Roselle will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Roselle is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Roselle or the Advisor.

Item 5 – Additional Compensation

Mr. Roselle has additional business activities where compensation is received that are detailed in Item 4 above.

Item 6 – Supervision

Mr. Roselle serves as the Principal of Blue Rock Financial Group and is supervised by Kelly Kaczmarczyk, the Chief Compliance Officer. Ms. Kaczmarczyk can be reached at (302) PLANNER (752-6637).

Blue Rock Financial Group has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Blue Rock Financial Group. Further, Blue Rock Financial Group is subject to regulatory oversight by various agencies. These agencies require registration by Blue Rock Financial Group and its Supervised Persons. As a registered entity, Blue Rock Financial Group is subject to examinations by regulators, which may be announced or unannounced. Blue Rock Financial Group is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Form ADV Part 2B – Brochure Supplement

for

Kelly N. Kaczmarczyk, CFP®
Chief Compliance Officer and Director of Operations

Effective: August 24, 2023

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Kelly N. Kaczmarczyk, CFP® (CRD# 7055176) in addition to the information contained in the Dravo Bay LLC (“Blue Rock Financial Group” or the “Advisor”, CRD# 298558) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Blue Rock Financial Group Disclosure Brochure or this Brochure Supplement, please contact us at (302) PLANNER (752-6637).

Additional information about Ms. Kaczmarczyk is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with her full name or her Individual CRD# 7055176.

Item 2 – Educational Background and Business Experience

Kelly N. Kaczmarczyk, CFP®, born in 1996, is dedicated to advising Clients of Blue Rock Dravo Bay as the Chief Compliance Officer and Director of Operations. Ms. Kaczmarczyk earned a Bachelor of Science Degree from University of Delaware in 2018. Additional information regarding Ms. Kaczmarczyk's employment history is included below.

Employment History:

Chief Compliance Officer and Director of Operations, Dravo Bay LLC [dba Blue Rock Financial Group]	10/2018 to Present
Intern, American Heart Association	06/2018 to 09/2018
Intern, Hockessin Athletic Club	02/2018 to 05/2018
Hostess and Server, Klondike Kates	06/2014 to 10/2017

CERTIFIED FINANCIAL PLANNER™ (“CFP®”)

The CERTIFIED FINANCIAL PLANNER™, CFP®, and federally registered CFP® (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by CERTIFIED FINANCIAL PLANNER™ Board of Standards, Inc. (“CFP® Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 87,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- *Education* – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- *Examination* – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real-world circumstances;
- *Experience* – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- *Ethics* – Agree to be bound by CFP Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- *Continuing Education* – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- *Ethics* – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP®.

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Ms. Kaczmarczyk. Ms. Kaczmarczyk has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Ms. Kaczmarczyk.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Ms. Kaczmarczyk.***

However, we do encourage you to independently view the background of Ms. Kaczmarczyk on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with her full name or her Individual CRD# 7055176.

Item 4 – Other Business Activities

Ms. Kaczmarczyk is dedicated to the investment advisory activities of Blue Rock Financial Group's Clients. Ms. Kaczmarczyk does not have any other business activities.

Item 5 – Additional Compensation

Ms. Kaczmarczyk is dedicated to the investment advisory activities of Blue Rock Financial Group's Clients. Ms. Kaczmarczyk does not receive any additional forms of compensation.

Item 6 – Supervision

Ms. Kaczmarczyk serves as the Chief Compliance Officer and Director of Operations of Blue Rock Financial Group. Ms. Kaczmarczyk can be reached at (302) PLANNER (752-6637).

Blue Rock Financial Group has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Blue Rock Financial Group. Further, Blue Rock Financial Group is subject to regulatory oversight by various agencies. These agencies require registration by Blue Rock Financial Group and its Supervised Persons. As a registered entity, Blue Rock Financial Group is subject to examinations by regulators, which may be announced or unannounced. Blue Rock Financial Group is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Form ADV Part 2B – Brochure Supplement

for

**James R. Whalen, CFP®, CIMA®
Director of Financial Planning**

Effective: August 24, 2023

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of James R. Whalen, CFP®, CIMA®, (CRD# 5876202) in addition to the information contained in the Dravo Bay LLC (“Blue Rock Financial Group” or the “Advisor”, CRD# 298558) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the content of the Blue Rock Financial Group Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (302) 379-3561.

Additional information about Mr. Whalen is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 5876202.

Item 2 – Educational Background and Business Experience

James R. Whalen, CFP®, CIMA®, born in 1985, is dedicated to advising Clients of Blue Rock Financial Group as the Director of Financial Planning. Mr. Whalen also earned a degree in Business Management & Finance from Pennsylvania State University in 2007. Additional information regarding Mr. Whalen's employment history is included below.

Employment History:

Director of Financial Planning, Dravo Bay LLC [dba Blue Rock Financial Group]	10/2018 to Present
Director of Client Relations, Cambridge Investment Research Group	05/2017 to 10/2018
Self Employed	07/2016 to 05/2017
Registered Representative, Director of Financial Planning, Northwestern Mutual Investment Services, Inc.	01/2016 to 07/2016
Financial Advisory Specialist, Hanlon Financial Group	06/2014 to 01/2016

CERTIFIED FINANCIAL PLANNER™ ("CFP®")

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP® (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP® Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- *Education* – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP® Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP® Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- *Examination* – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- *Experience* – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- *Ethics* – Agree to be bound by CFP® Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- *Continuing Education* – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- *Ethics* – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP® Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Certified Investment Management Analyst™ ("CIMA®")

The CIMA® certification signifies that an individual has met initial and ongoing experience, ethical, education, and examination requirements for investment management consulting, including advanced investment management theory

and application. To earn CIMA® certification, candidates must: submit an application, pass a background check and have an acceptable regulatory history; pass an online Qualification Examination; complete an in-person or online executive education program at an AACSB® accredited university business school; pass an online Certification Examination; and have an acceptable regulatory history as evidenced by FINRA Form U-4 or other regulatory requirements and have three years of financial services experience at the time of certification.

CIMA® certificates must adhere to IMCA's Code of Professional Responsibility, Standards of Practice, and Rules and Guidelines for Use of the Marks. CIMA® designees must report 40 hours of continuing education credits, including two ethics hours every two years to maintain the certification. The designation is administered through the Investment Management Consultants Association™ (IMCA®).

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Whalen. Mr. Whalen has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Whalen.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices.

As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Whalen. However, the Advisor encourages Clients to independently view the background of Mr. Whalen on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 5876202.

Item 4 – Other Business Activities

Mr. Whalen is dedicated to the investment advisory activities of Blue Rock Financial Group's Clients. Mr. Whalen does not have any other business activities.

Item 5 – Additional Compensation

Mr. Whalen is dedicated to the investment advisory activities of Blue Rock Financial Group's Clients. Mr. Whalen does not receive any additional forms of compensation.

Item 6 – Supervision

Mr. Whalen serves as the Director of Financial Planning of Blue Rock Financial Group and is supervised by Kelly Kaczmarczyk, the Chief Compliance Officer. Ms. Kaczmarczyk can be reached at (302) 379-3561.

Blue Rock Financial Group has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Blue Rock Financial Group. Further, Blue Rock Financial Group is subject to regulatory oversight by various agencies. These agencies require registration by Blue Rock Financial Group and its Supervised Persons. As a registered entity, Blue Rock Financial Group is subject to examinations by regulators, which may be announced or unannounced. Blue Rock Financial Group is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Form ADV Part 2B – Brochure Supplement

for

**Jeffrey T. Kaczmarczyk, CFA®
Advisor**

Effective: August 24, 2023

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Jeffrey T. Kaczmarczyk, CFA® (CRD# 7367545) in addition to the information contained in the Dravo Bay LLC (“Blue Rock Financial Group” or the “Advisor”, CRD# 298558) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Blue Rock Financial Group Disclosure Brochure or this Brochure Supplement, please contact us at (302) PLANNER (752-6637).

Additional information about Mr. Kaczmarczyk is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 7367545.

Item 2 – Educational Background and Business Experience

Jeffrey T. Kaczmarczyk, CFA®, born in 1989, is dedicated to advising Clients of Blue Rock Financial Group as an Advisor. Mr. Kaczmarczyk earned a Masters of Business Administration from the University of Delaware in 2017. Mr. Kaczmarczyk also earned a Bachelor of Arts in Health Sciences from Gettysburg College in 2011. Additional information regarding Mr. Kaczmarczyk's employment history is included below.

Employment History:

Advisor, Dravo Bay LLC [dba Blue Rock Financial Group]	04/2021 to Present
Investment Manager, Roch Capital	07/2020 to 10/2020
Investment Manager, FS Investments	12/2019 to 06/2020
Senior Investment Associate, Wilmington Trust	11/2015 to 12/2019
Family Office Associate, Griz Inc	06/2014 to 11/2015
Research Associate, Vorbeck Materials	02/2012 to 05/2014
Operations Associate, University of Delaware	08/2011 to 02/2012

Chartered Financial Analyst™ ("CFA®")

The Chartered Financial Analyst™ ("CFA®") charter is a professional designation established in 1962 and awarded by CFA® Institute. To earn the CFA® charter, candidates must pass three sequential, six-hour examinations over two to four years. The three levels of the CFA® Program test a wide range of investment topics, including ethical and professional standards, fixed-income analysis, alternative and derivative investments, and portfolio management and wealth planning. Also, CFA® charter holders must have at least four years of acceptable professional experience in the investment decision-making process and must commit to abide by, and annually reaffirm their adherence to the CFA® Institute Code of Ethics and Standards of Professional Conduct. CFA® is a trademark owned by CFA® Institute.

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Kaczmarczyk. Mr. Kaczmarczyk has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Kaczmarczyk.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Kaczmarczyk.***

However, we do encourage you to independently view the background of Mr. Kaczmarczyk on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov/ by searching with his full name or his Individual CRD# 7367545.

Item 4 – Other Business Activities

Mr. Kaczmarczyk is dedicated to the investment advisory activities of Blue Rock Financial Group's Clients. Mr. Kaczmarczyk does not have any other business activities.

Item 5 – Additional Compensation

Mr. Kaczmarczyk is dedicated to the investment advisory activities of Blue Rock Financial Group's Clients. Mr. Kaczmarczyk does not receive any additional forms of compensation.

Item 6 – Supervision

Mr. Kaczmarczyk serves as an Advisor of Blue Rock Financial Group and is supervised by Kelly Kaczmarczyk, the Chief Compliance Officer. Ms. Kaczmarczyk can be reached at (302) PLANNER (752-6637).

Blue Rock Financial Group has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Blue Rock Financial Group. Further, Blue Rock Financial Group is subject to regulatory oversight by various agencies. These agencies require registration by Blue Rock Financial Group and its Supervised Persons. As a registered entity, Blue Rock Financial Group is subject to examinations by regulators, which may be announced or unannounced. Blue Rock Financial Group is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Form ADV Part 2B – Brochure Supplement

for

**Carter A. McClung, CFP®, CSLP®
Financial Planner**

Effective: August 24, 2023

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of Carter A. McClung, CFP®, CSLP® (CRD# 298558) in addition to the information contained in the Dravo Bay LLC ("Blue Rock Financial Group" or the "Advisor", CRD# 298558) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Blue Rock Financial Group Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (302) PLANNER (752-6637).

Additional information about Mr. McClung is available on the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 298558.

Item 2 – Educational Background and Business Experience

Carter A. McClung, CFP®, CSLP®, born in 1997, is dedicated to advising Clients of Blue Rock Financial Group as a Financial Planner. Mr. McClung earned a BS in Finance & Financial Planning and Wealth Management from the University of Delaware in 2019. Additional information regarding Mr. McClung's employment history is included below.

Employment History:

Financial Planner, Dravo Bay LLC [dba Blue Rock Financial Group]	01/2020 to Present
Student Loan Consultant, Student Loan Planning	08/2023 to Present
Financial Planning Intern, Bell Rock Capital	06/2019 to 08/2019
Peer-to-Peer Financial Consultant, University Of Delaware	10/2018 to 02/2019
Financial Advisor Intern, Creative Financial Group	06/2018 to 02/2019
Field Supervisor, Sparkling Pool Services	05/2016 to 09/2017

CERTIFIED FINANCIAL PLANNER™ (“CFP®”)

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP® (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP® Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- *Education* – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP® Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP® Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- *Examination* – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- *Experience* – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- *Ethics* – Agree to be bound by CFP® Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- *Continuing Education* – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- *Ethics* – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP® Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

CERTIFIED STUDENT LOAN PROFESSIONAL™ (CSLP®)

Carter McClung earned his Certified Student Loan Professional™, CSLP® designation in December, 2022. The Certified Student Loan Professional™, CSLP® is a professional designation mark granted by the United States by Certified Student Loan Professional™, CSLP®.

Loan Advisors Board of Standards, Inc. ("CSLA BOS"). The CSLP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold a CSLP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients.

To attain the right to use the CSLP® mark, an individual must satisfactorily fulfill the following requirements:

- Education – Obtain a college-level certificate of study in Student Loan Planning that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university)
or
- Have 2 years of industry experience as a licensed financial representative, state insurance agent, hold a CPA license or be an Enrolled agent
and
- Ethics – Agree to be bound by the CSLA Board's Standards of code of ethics and professional conduct.

CSLP® professionals who fail to comply with the above standards and requirements may be subject to CSLA Board's enforcement process, which could result in suspension or permanent revocation of their CSLP® certification.

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. McClung. Mr. McClung has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. McClung.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. McClung.***

However, we do encourage you to independently view the background of Mr. McClung on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov/ by searching with his full name or his Individual CRD# 298558.

Item 4 – Other Business Activities

Student Loan Planning

Mr. McClung is also a Student Loan Consultant at Student Loan Planning. In his role as a Student Loan Consultant, Mr. McClung advises student loan borrowers on loan repayment plans. Mr. McClung is compensated per each completed consultation, and spends approximately 10% of his time per month in this capacity.

Item 5 – Additional Compensation

Mr. McClung has additional business activities where compensation is received that are detailed in item 4 above.

Item 6 – Supervision

Mr. McClung serves as a Financial Consultant of Blue Rock Financial Group and is supervised by Kelly Kaczmarczyk, the Chief Compliance Officer. Ms. Kaczmarczyk can be reached at (302) PLANNER (752-6637).

Blue Rock Financial Group has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Blue Rock Financial Group. Further, Blue Rock Financial Group is subject to regulatory oversight by various agencies. These agencies require registration by Blue Rock Financial Group and its Supervised Persons. As a registered entity, Blue Rock Financial Group is subject to examinations by regulators, which may be announced or unannounced. Blue Rock Financial Group is required to periodically update the

information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Form ADV Part 2B – Brochure Supplement

for

**John T. Dressler, CFP®
Financial Advisor – Client Relationship Manager**

Effective: August 24, 2023

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of John T. Dressler, CFP® (CRD# 2089455) in addition to the information contained in the Dravo Bay LLC (“Blue Rock Financial Group” or the “Advisor”, CRD# 298558) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Blue Rock Financial Group Disclosure Brochure or this Brochure Supplement, please contact us at (302) PLANNER (752-6637).

Additional information about Mr. Dressler is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 2089455.

Item 2 – Educational Background and Business Experience

John T. Dressler, CFP®, born in 1962, is dedicated to advising Clients of Blue Rock Dravo Bay as a Financial Advisor – Client Relationship Manager. Mr. Dressler earned a Bachelor's Degree in Professional Aeronautics from Embry Riddle Aeronautical University in 1986. Mr. Dressler also earned an Associate's Degree in Aviation Weather from Community College of the Air Force.

Employment History:

Financial Advisor – Client Relationship Manager, Dravo Bay LLC [dba Blue Rock Financial Group]	12/2021 to Present
Professional Financial Counselor, Zeiders, Inc	01/2017 to Present
Owner, DelawareRarities, LLC	01/2014 to Present
AFJROTC Senior Instructor, Polytech High School	10/2016 to 11/2019
Financial Planner-Advisor, Evershore Financial Group	01/2014 to 10/2016
Regional Services Director, American Red Cross	06/2012 to 01/2014
Current Operations Branch Team Chief, US Air Force	06/2005 to 01/2012

CERTIFIED FINANCIAL PLANNER™ (“CFP®”)

The CERTIFIED FINANCIAL PLANNER™, CFP®, and federally registered CFP® (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by CERTIFIED FINANCIAL PLANNER™ Board of Standards, Inc. (“CFP® Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 87,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- **Education** – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real-world circumstances;
- **Experience** – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- **Ethics** – Agree to be bound by CFP Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- **Continuing Education** – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- **Ethics** – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP®.

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Dressler. Mr. Dressler has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Dressler.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Dressler.***

However, we do encourage you to independently view the background of Mr. Dressler on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 2089455.

Item 4 – Other Business Activities

Zeiders, Inc.

Mr. Dressler is a Professional Financial Counselor at Zeiders, Inc. Mr. Dressler's role at Zeiders is to provide government contractors with financial counseling. Mr. Dressler spends approximately 4 hours a month in his role as a Professional Financial Counselor.

Item 5 – Additional Compensation

Mr. Dressler has additional business activities where compensation is received that are detailed in Item 4 above.

Item 6 – Supervision

Mr. Dressler serves as a Financial Advisor – Client Relationship Manager of Blue Rock Financial Group. Mr. Dressler can be reached at (302) PLANNER (752-6637).

Blue Rock Financial Group has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Blue Rock Financial Group. Further, Blue Rock Financial Group is subject to regulatory oversight by various agencies. These agencies require registration by Blue Rock Financial Group and its Supervised Persons. As a registered entity, Blue Rock Financial Group is subject to examinations by regulators, which may be announced or unannounced. Blue Rock Financial Group is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Privacy Policy

Effective Date: August 24, 2023

Our Commitment to You

Dravo Bay LLC dba Blue Rock Financial Group ("Blue Rock Financial Group" or the "Advisor") is committed to safeguarding the use of personal information of our Clients (also referred to as "you" and "your") that we obtain as your Investment Advisor, as described here in our Privacy Policy ("Policy").

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. Blue Rock Financial Group (also referred to as "we", "our" and "us") protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

Blue Rock Financial Group does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

Why you need to know?

Registered Investment Advisors ("RIAs") must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

What information do we collect from you?

Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number[s]	Income and expenses
E-mail address[es]	Investment activity
Account information (including other institutions)	Investment experience and goals

What Information do we collect from other sources?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client's personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
Servicing our Clients We may share non-public personal information with non-affiliated third parties (such as administrators, broker-dealers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting. Blue Rock Financial Group shares Client information with Purshe Kaplan Sterling Investments, inc. ("PKS") due to the oversight PKS has over certain supervised persons of the Advisor. You may also contact us at any time for a copy of the PKS Privacy Policy.	Yes	No
Marketing Purposes Blue Rock Financial Group does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where Blue Rock Financial Group or the Client has a formal agreement with the financial institution. We will only share information for purposes of servicing your accounts, not for marketing purposes.	No	Not Shared
Authorized Users Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent[s] or representative[s].	Yes	Yes
Information About Former Clients Blue Rock Financial Group does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this Policy, and will provide you with a revised Policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting the Advisor at (302) PLANNER (752-6637).