

Form ADV Part 2A Appendix 1: Wrap Fee Program Brochure



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This wrap fee program brochure provides information about the qualifications and business practices of EdgeRock Capital LLC d/b/a EdgeRock Wealth Management (“EdgeRock”, “us”, “we” or “our”). If you have any questions about the contents of this brochure, please contact us by telephone at 303-780-7350 or by email at dtc@edgerockwealth.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about EdgeRock also is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 – Material Changes

We have no material changes to disclose in relation to this Item at this time. We encourage you to read this brochure in its entirety.

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Item 4 – Services, Fees and Compensation

EdgeRock sponsors and serves as primary portfolio manager for the EdgeRock Wrap Program. This wrap fee program includes portfolio management with bundled services such as financial planning and consulting services, as appropriate. Typically, transaction fees are not charged to a client's wrap fee account. However, please note that EdgeRock receives a portion of the wrap fee for our services. Please refer to Item 6 below for additional information regarding EdgeRock's receipt of such compensation.

As part of this service, our firm will manage your account and/or utilize unaffiliated third-party portfolio managers from a registered investment advisory firm. EdgeRock offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. EdgeRock develops an investment strategy for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels) and then constructs a plan to aid in the selection of a portfolio that matches each client's specific situation. Investment Supervisory Services in the EdgeRock Wrap Program include, but are not limited to, the following:

- Investment strategy
- Asset allocation
- Asset selection
- Risk tolerance
- Regular portfolio monitoring

Based on a client's individual circumstances and needs, EdgeRock determines whether a wrap fee program would be appropriate for each client. When making that determination, EdgeRock considers factors such as account size, risk tolerance, the opinion of each client and, if applicable, the investment philosophy of the third-party portfolio manager(s) involved in the wrap program.

EdgeRock regularly monitors the performance of each client's portfolio in the EdgeRock Wrap Program. If it is determined that the wrap fee program is no longer appropriate for a client, EdgeRock will remove the client's assets from the wrap fee program and place the client's assets in a non-wrap fee transaction-based program.

Our standard annual fee for the EdgeRock Wrap Program, based on a percentage of your assets under our management, follows the table below:

Less than \$500,000.00	1.50%
From \$500,000.00 to \$999,999.99	1.35%
From \$1,000,000.00 to \$2,999,999.99	1.20%
\$3,000,000.00 or above	1.00%

In a wrap fee arrangement, clients pay a single fee for advisory, brokerage and custodial services. Client's portfolio transactions may be executed without commission charge in a wrap fee arrangement. In evaluating such an arrangement, the client should also consider that, depending upon the level of the wrap fee charged by the broker-dealer, the amount of portfolio activity in the client's account, and other factors, the wrap fee may or may not exceed the aggregate cost of such services if they were to be provided separately. We will review with clients any separate program fees that may be charged to clients.

In addition to our advisory fees, under certain circumstances, clients are also responsible for the fees and expenses charged by custodians and imposed by broker dealers, including, but not limited to, any transaction charges imposed by a broker dealer with which an independent investment manager effects transactions for the client's account(s). Please refer to the "Brokerage Practices" section (Item 12) of our Form ADV Part 2A firm brochure for additional information.

Item 5 – Account Requirements and Types of Clients

The EdgeRock Wrap Program currently has a minimum investment requirement of \$1000. We typically offer investment advice through the EdgeRock Wrap Program to individuals and high net worth individuals.

Item 6 – Portfolio Management Selection and Evaluation

EdgeRock Capital LLC, a Colorado limited liability company, is based in Englewood, CO. EdgeRock Capital LLC was established 2018 and conducts its advisory business under the name EdgeRock Wealth Management (“EdgeRock”, “us”, “we” or “our”). Kyle F. O’Dell is our President and principal owner.

As previously disclosed, EdgeRock sponsors and provides portfolio management services to EdgeRock Wrap Program accounts. Participating clients' assets are managed directly by advisory personnel of our firm and/or one or more unaffiliated third-party portfolio manager(s) who serve as sub-adviser(s) for a client’s EdgeRock Wrap Program account (“Third-Party Manager” or “Third-Party Managers”). EdgeRock’s management and all individuals that render investment advisory services on behalf of EdgeRock or on behalf of an unaffiliated third-party investment advisory firm must have substantive investment related experience. In addition, all such individuals have attained all required investment-related licenses and/or designations. Kyle O’Dell, President, determines the general investment advice given to EdgeRock Wrap Program participants. Mr. O’Dell founded EdgeRock in 2018 and has acted as portfolio manager to the firm’s client accounts since that time. Mr. O’Dell has served as a portfolio manager and investment adviser representative for advisory clients since 2009. Clients can refer to Form ADV, Part 2B: Brochure Supplement to obtain educational and employment history for Mr. O’Dell or any of EdgeRock’s investment adviser representatives. Please contact Robert Foss, Chief Compliance Officer of EdgeRock, by telephone at 303-780-7350 or by email at dtc@edgerockwealth.com if you have not received a copy of these Brochure Supplements.

EdgeRock receives a portion of the wrap fee for our services. As a result, there is a conflict of interest to the extent that EdgeRock is incentivized to encourage clients to invest within the EdgeRock Wrap Program because EdgeRock receives a higher management fee for wrap fee program accounts than it does for client accounts which are not in the wrap fee program. Please note, however, that EdgeRock typically absorbs transaction fees for client accounts within the EdgeRock Wrap Program. While EdgeRock endeavors at all times to put the interests of its clients first as part of EdgeRock’s fiduciary duty, clients should be aware that the receipt of higher management fees itself creates a conflict of interest and may affect the judgment of the individuals making recommendations. To mitigate or eliminate this potential conflict, EdgeRock conducts reviews of wrap fee program client accounts periodically to confirm that the accounts is best suited to be managed within the EdgeRock Wrap Program.

For certain wrap fee program client accounts, EdgeRock representatives select one or more Third-Party Manager(s) to serve as sub-adviser(s) for a client’s EdgeRock Wrap Program account. Based on a client's individual circumstances and needs, EdgeRock determines which Third-Party Manager would be appropriate for managing

each client's account. When making that determination, EdgeRock considers factors such as account size, risk tolerance, the opinion of each client and the investment philosophy of the Third-Party Manager. EdgeRock regularly monitors the performance of Third-Party Manager. If it is determined that the Third-Party Manager is no longer appropriate for a client's account(s), EdgeRock will remove that Third-Party Manager from managing that client's account(s).

EdgeRock will conduct appropriate initial and periodic due diligence on unaffiliated third-party portfolio managers, making reasonable inquiries into their performance calculations based on industry standards, policies and procedures, Code of Ethics, and other operational and compliance matters deemed important to account performance and risk management. EdgeRock does not review performance information provided by unaffiliated third-party managers to determine or verify their accuracy. Rather, EdgeRock relies on the accuracy of performance reviews conducted by unaffiliated third-party managers regarding their performance outside of investment managed directly by EdgeRock. Accordingly, performance information may not be calculated on a uniform and consistent basis.

Investment Supervisory Services

As mentioned within Item 4 of this Appendix, EdgeRock offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. EdgeRock develops an investment strategy for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels) and then constructs a plan to aid in the selection of a portfolio that matches each client's specific situation. Investment Supervisory Services include, but are not limited to, the following:

- Investment strategy
- Asset allocation
- Asset selection
- Risk tolerance
- Regular portfolio monitoring

EdgeRock evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. EdgeRock typically provides portfolio management services on a discretionary basis and maintains advisory accounts for certain clients on a non-discretionary basis. EdgeRock requests discretionary authority from clients to select securities and place orders with broker-dealers to execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented for each client.

Clients are responsible for notifying us of any updates regarding their financial situation, risk tolerance or investment objective and whether they wish to impose or modify existing investment restrictions; however we contact you at least annually to discuss any changes or updates regarding your financial situation, risk tolerance or investment objectives. We are always reasonably available to consult with you relative to the status of your Account.

It is important that you understand that we manage investments for other clients and may give them advice or take actions for them that is different from the advice we provide to you, or actions taken for you. We are not obligated to buy, sell or recommend to you any security or other investment that we may buy, sell or recommend for any other clients.

Under certain circumstances, conflicts arise in the allocation of investment opportunities among accounts that we

manage. We strive to allocate investment opportunities believed to be appropriate for your account(s) and other accounts advised by our firm among such accounts equitably and consistent with the best interests of all accounts involved. However, there can be no assurance that a particular investment opportunity that comes to our attention will be allocated in any particular manner. If we obtain material, non-public information about a security or its issuer that we may not lawfully use or disclose, we have absolutely no obligation to disclose the information to any client or use it for any client's benefit.

As mentioned in Item 4 of this Appendix, EdgeRock sponsors and provides portfolio management services for the EdgeRock Wrap Program which includes bundled services such as financial planning and consulting services, as appropriate. As part of this service, our firm will manage your account and/or utilize a Third-Party Manager based on a client's individual circumstances and needs, EdgeRock determines whether a wrap fee program would be appropriate for each client. When making that determination, EdgeRock considers factors such as account size, risk tolerance, the opinion of each client and the investment philosophy of the third-party portfolio manager(s) involved in the wrap program. The firm encourages clients to review our wrap fee program disclosure document regarding the characteristics of the program.

If you choose to place your account in a transaction-based pricing program, you typically pay separate commissions, ticket charges, and custodian fees for the execution of transactions in your account. These charges (if applicable) will be in addition to the investment management fee that you will pay us for other any other accounts still part of the wrap fee program. If you receive services through a wrap fee program, typically you only pay fees based on assets under management and you do not pay a separate commission, ticket charge, or custodian fees for the execution of transactions in your account. EdgeRock and certain service providers, including (if applicable) the custodian, and model portfolio manager, will receive a portion of the fee as compensation for services.

The firm will conduct appropriate initial and periodic due diligence on unaffiliated third-party portfolio managers, making reasonable inquiries into their performance calculations, policies and procedures, Code of Ethics, and other operational and compliance matters deemed important to account performance and risk management.

Retirement Account Rollovers

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act of 1974, as amended ("ERISA") and/or the Internal Revenue Code (the "Code"), as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

When providing recommendations to retirement plan accounts involving rollover considerations, there are

generally four options regarding an existing retirement plan account. An employee may use a combination of those options, such as; (i) leave the funds in the former employer's plan, if permitted, (ii) roll over the funds to a new employer's plan, if one is available and rollovers are permitted, (iii) roll over to an Individual Retirement Account ("IRA"), or (iv) cash out the account value (which could, depending upon the individual's age, result in adverse tax consequences). If your designated IAR recommends that you rollover your retirement plan assets into an account to be managed by our firm, such recommendation creates a conflict of interest insofar as we will earn an advisory fee on the rolled over assets. You are under no obligation to roll over retirement plan assets to an account managed by us.

Financial Planning & Consulting Services

EdgeRock offers financial planning services, which involve preparing a written financial plan covering specific or multiple topics. We provide full written financial plans, which typically address one or more the following topics: investment planning, retirement planning, insurance planning, tax planning, education planning, portfolio review, and asset allocation. However, our tax planning services are not a substitute for working with a Certified Public Accountant. When providing financial planning and consulting services, the role of your investment adviser representative is to find ways to help you understand your overall financial situation and help you set financial objectives. Your investment adviser representative will rely on information provided by you. Therefore, issues and information not provided will not be taken into consideration when your investment adviser representative develops his or her analysis and recommendations under a written financial plan. We also offer consultations in order to discuss financial planning issues when you do not need a written financial plan. We also offer "as-needed" consultations, which are limited to consultations in response to a particular investment or financial planning issue raised or request made by you. Under an "as-needed" consultation, it will be incumbent upon you to identify those particular issues for which you are seeking our advice or consultation. EdgeRock does not currently provide Financial Planning and Consulting Services as an a la carte service, but, at the discretion of its advisors, will waive the fee to do so.

Model Portfolio Solutions

EdgeRock offers model portfolio selection services, which allows EdgeRock to exercise discretion to select model portfolios managed by the EdgeRock investment committee and/or third-party unaffiliated investment managers. An investment adviser representative will assist you in completing a client profile questionnaire and review the information you provide. We will then select the model portfolio(s) that aligns with your disclosed risk tolerance and investment objectives.

We will be available at reasonable times to answer questions that you may have regarding your account. We will have the ability to select the model portfolio(s) as well as the ability to reallocate funds from or to the model portfolio(s) and funds in other accounts over which you have granted us discretionary authority. You should be aware that there may be other model portfolios not recommended by our firm, that are suitable for you and that may be less costly than arrangements recommended by our firm. No guarantees can be made that your financial goals or objectives will be achieved through our model program or by a recommended/selected model portfolio. Further, no guarantees of performance can ever be offered by our firm (Please refer to Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss for more details.)

Newsletters

EdgeRock occasionally prepares general, educational and informational newsletters. Newsletters are always offered on an impersonal basis and do not focus on the needs of a specific individual. Newsletters are provided to clients and prospective clients at no charge.

Workshops

EdgeRock occasionally provides workshops in areas such as financial planning, retirement planning, estate planning, college planning, and charitable planning. Seminars are always offered on an impersonal basis and do not focus on the individual needs of participants. No fees are charged for our workshops.

Webinars

EdgeRock occasionally prepares webinars for its clients and prospective clients that present information in areas such as financial planning and current market developments. Webinars are always offered on an impersonal basis and do not focus on the individual needs of participants. No fees are charged for Webinars. Webinars can only be accessed via electronic invitation.

Tailor Advisory Services to Individual Needs of Clients

EdgeRock's advisory services are always provided based on your individual needs. This means, for example, that when we provide asset management services, you are given the ability to impose reasonable restrictions on the accounts we manage for you, including specific investment selections and sectors. We work with you on a one-on-one basis through interviews and questionnaires to determine your investment objectives and suitability information.

We will not enter into an investment adviser relationship with a prospective client whose investment objectives may be considered incompatible with our investment philosophy or strategies or where the prospective client seeks to impose unduly restrictive investment guidelines.

Limited Advice for Certain Types of Investments

EdgeRock provides investment advice on the following types of investments:

- Mutual Funds
- Exchange Traded Funds (ETFs)
- Exchange-listed Securities
- Warrants
- Corporate Debt Securities
- Commercial Paper
- Certificates of Deposit
- Municipal Securities
- US Government Securities

Although we generally provide advice only on the products previously listed, we reserve the right to offer advice on any investment product that may be suitable for each client's specific circumstances, needs, goals and objectives.

It is not our typical investment strategy to attempt to time the market, but we may increase cash holdings modestly as deemed appropriate based on your risk tolerance and our expectations of market behavior. Under certain circumstances, we will modify our investment strategy to accommodate special situations such as low cost basis stock, stock options, legacy holdings, inheritances, closely held businesses, collectibles, or special tax situations.

Performance-based Fees and Side-by-Side Management

EdgeRock does not charge any performance-based fees, which are fees based upon a share of capital gains on or capital appreciation of the assets of a client.

Methods of Analysis and Investment Strategies

Methods of Analysis

EdgeRock uses the following methods of analysis in formulating investment advice:

Fundamental – This is a method of evaluating a security by attempting to measure its intrinsic value by examining related economic, financial and other qualitative and quantitative factors. Fundamental analysts attempt to study everything that can affect the security's value, including macroeconomic factors (like the overall economy and industry conditions) and individually specific factors (like the financial condition and management of a company). The end goal of performing fundamental analysis is to produce a value that an investor can compare with the security's current price in hopes of figuring out what sort of position to take with that security (underpriced = buy, overpriced = sell). Fundamental analysis is considered to be the opposite of technical analysis. Fundamental analysis is about using real data to evaluate a security's value. Although most analysts use fundamental analysis to value stocks, this method of valuation can be used for just about any type of security.

The risk associated with fundamental analysis is that it is somewhat subjective. While a quantitative approach is possible, fundamental analysis usually entails a qualitative assessment of how market forces interact with one another in their impact on the investment in question. It is possible for those market forces to point in different directions, thus necessitating an interpretation of which forces will be dominant. This interpretation may be wrong and could therefore lead to an unfavorable investment decision.

Technical – This method evaluates securities by analyzing statistics generated by market activity, such as past prices and volume. Technical analysts do not attempt to measure a security's intrinsic value, but instead use charts and other tools to identify patterns that can suggest future activity. Technical analysts believe that the historical performance of stocks and markets are indications of future performance. Technical analysis is even more subjective than fundamental analysis in that it relies on proper interpretation of a given security's price and trading volume data. A decision might be made based on a historical move in a certain direction that was accompanied by heavy volume; however, that heavy volume may only be heavy relative to past volume for the security in question, but not compared to the future trading volume. Therefore, there is the risk of a trading decision being made incorrectly, since future trading volume is an unknown. Technical analysis is also done through observation of various market sentiment readings, many of which are quantitative. Market sentiment gauges the relative degree of bullishness and bearishness in a given security, and a contrarian investor utilizes such sentiment advantageously. When most traders are bullish, then there are very few traders left in a position to buy the security in question, so it becomes advantageous to sell it ahead of the crowd. When most traders are bearish, then there are very few traders left in a position to sell the security in question, so it becomes advantageous to buy it ahead of the crowd.

The risk in utilization of such sentiment technical measures is that a very bullish reading can always become more bullish, resulting in lost opportunity if the money manager chooses to act upon the bullish signal by selling out of a position. The reverse is also true in that a bearish reading of sentiment can always become more bearish, which may result in a premature purchase of a security.

There are risks involved in using any analysis method.

To conduct analysis, EdgeRock gathers information from financial newspapers and magazines, inspection of corporate activities, research materials prepared by others, corporate rating services, timing services, annual reports, prospectuses and filings with the SEC, and company press releases.

Investment Strategies

EdgeRock uses the following investment strategies when managing client assets and/or providing investment advice:

Long term purchases: Investments held at least a year.

Long term investing is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various other types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

Short term purchases: Investments held for less than a year.

Short term investing is designed to minimize risk factors such as market volatility and interest rate risk, while still attempting to earn a rate of return. EdgeRock will recommend this type of investing to clients that have an alternate use for their capital within a 3-12 month time frame.

Tactical asset allocation.

A tactical asset allocation strategy allows for a range of percentages in each asset class (such as Stocks = 40-50%). The ranges establish minimum and maximum acceptable percentages that permit the investor to take advantage of market conditions within these parameters. Thus, a minor form of market timing is possible, since the investor can move to the higher end of the range when stocks are expected to do better and to the lower end when the economic outlook is bleak.

Strategic asset allocation.

A strategic asset allocation strategy calls for setting target allocations and then periodically rebalancing the portfolio back to those targets as investment returns skew the original asset allocation percentages. The concept is akin to a “buy and hold” strategy, rather than an active trading approach. Of course, the strategic asset allocation targets may change over time as the client’s goals and needs change and as the time horizon for major events such as retirement and college funding grow shorter.

Value Investing.

Value Investing can be described as a strategy of selecting stocks that trade for less than their intrinsic values. Value investors typically seek stocks of companies that they believe the market has undervalued. They believe the market overreacts to good and bad news, resulting in stock price movements that do not correspond with the company's long-term fundamentals. The result is an opportunity for value investors to profit by buying

when the price is deflated. Often, value investors select stocks with lower-than-average price-to-book or price-to-earnings ratios and/or high dividend yields. The risks associated with value-investing include incorrectly analyzing and overestimating the intrinsic value of a business, concentration risk, under performance relative to major benchmarks, macro-economic risks, investing in value traps i.e. businesses that remain perpetually undervalued, and lost purchasing power on cash holdings in the case of inflation.

Primarily Recommend One Type of Security

We do not primarily recommend one type of security to clients. Instead, we recommend any product that may be suitable for each client relative to that client's specific circumstances and needs.

Risks of Specific Securities Utilized

EdgeRock generally seeks investment strategies that do not involve significant or unusual risk beyond that of the general domestic and/or international equity markets. The investment types listed below (leaving aside Treasury Inflation Protected/Inflation Linked Bonds) are not guaranteed or insured by the FDIC or any other government agency.

Mutual Funds: Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. They can be of bond "fixed income" nature (lower risk) or stock "equity" nature (mentioned above).

Equity Investments: Equity investment generally refers to buying shares of stocks by an individual or firms in return for receiving a future payment of dividends and capital gains if the value of the stock increases. There is an innate risk involved when purchasing a stock that it may decrease in value and the investment may incur a loss (sometimes up to a 100% loss in the case of a bankruptcy of a stock holding).

Treasury Inflation Protected/Inflation Linked Bonds: The risk of default on these bonds is dependent upon the U.S. Treasury defaulting on its obligations (which is extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal.

Fixed Income: Fixed income is an investment in debt securities that guarantees fixed periodic payments in the future that may involve economic risks such as inflationary risk, interest rate risk, default risk, repayment of principal risk, etc. Fixed income securities carry risks such as the possibility of default on the principal, fluctuation in interest rates, and counterparties being unable to meet obligations.

Exchange Traded Funds ("ETF" or "ETFs"): Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Investing in Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed "electronic shares" not physical metal) also carries the risk of capital loss.

Real Estate Investment Trusts ("REITs"): REITs have specific risks including valuation due to cash flows, dividends paid in stock rather than cash, and the payment of debt resulting in dilution of shares.

Past performance is not a guarantee of future returns. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Proxy Voting

EdgeRock will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. We may provide clients with consulting assistance regarding proxy issues if they contact us with questions at our principal place of business.

Item 7 – Client Information Provided to Portfolio Managers

EdgeRock representatives are responsible for developing an initial financial profile of the prospective client. Prior to opening an account, we assist in determining a participant's profile for the EdgeRock Wrap Program by obtaining from the participant appropriate information (i.e., investment objectives, risk tolerance, time horizon, and any reasonable restrictions the client wishes to impose upon the management of the account). Initial investment strategy is jointly determined based on an assessment of the information provided by the client.

While we provide the client with reminders from time to time, it remains the client's responsibility to advise us of any changes to the information previously provided that might impact the ongoing suitability of any prior determined investment strategy and/or objectives. We will promptly communicate any reported changes to the client's portfolio manager.

EdgeRock representatives will directly contact each wrap fee program client at least annually to verify that there has been no change in the client's financial circumstances and/or investment objectives, and determine whether the client wishes to impose any reasonable restrictions on the management of the account(s). Any such changes or requests are communicated in writing to the client's portfolio manager, who is responsible for implementing appropriate adjustments to the client's portfolio.

Item 8 – Client Contact with Portfolio Managers

There are no restrictions on a client's ability to contact and consult with EdgeRock and/or their investment adviser representative. All communications directed to Third-Party Managers should be provided by clients directly to their EdgeRock investment adviser representative.

Item 9 – Additional Information

Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of us or the integrity of our management. Neither EdgeRock nor any of its supervised persons have been the subject of any legal or disciplinary event that would be material to your evaluation of the integrity of EdgeRock or that of its management.

Other Financial Industry Activities and Affiliations

EdgeRock is not and does not have a related person that is a broker/dealer, municipal securities dealer, government securities dealer or broker, an investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund), another investment adviser or financial planner, a futures commission merchant, commodity pool operator, or commodity trading advisor, a banking or thrift institution, a lawyer or law firm,

a pension consultant, a real estate broker or dealer, and a sponsor or syndicator of limited partnerships.

We are an independent registered investment adviser and only provide investment advisory services. We are not engaged in any other business activities and offer no other services except those described in this Disclosure Brochure.

Insurance Brokerage Affiliation

Kyle F. O'Dell, President of EdgeRock, is also the sole owner of Secure Wealth Strategies, Inc. ("Secure Wealth"), a life insurance brokerage. Secure Wealth continues to receive separate customary compensation for life insurance previously sold through that brokerage, however no new life insurance policies are sold or offered through Secure Wealth.

Insurance Business through EdgeRock Wealth Management, LLC and Advisors Excel, LLC

EdgeRock Capital, LLC is an affiliate of EdgeRock Wealth Management, LLC which utilizes Advisors Excel, LLC ("AE") to provide client billing and insurance-based solutions to clients. EdgeRock Wealth Management, LLC and EdgeRock Capital, LLC are under common control and ownership. EdgeRock Wealth Management, LLC and EdgeRock Capital, LLC are not affiliated with AE. AE is an independent marketing organization that markets/wholesales life insurance and fixed annuities to third-party insurance agents in exchange for a marketing and/or override fee from the issuer of such life insurance/annuity products. The investment adviser representatives of EdgeRock who serve in a separate capacity as life insurance agents utilize the marketing and wholesaling services of AE.

As a client of EdgeRock, your investment adviser representative will also serve as a life insurance agent. This means your investment adviser representative, acting as a life insurance agent, will recommend you place your assets in life insurance products and annuities when he or she believes it is in your best interest to do so. These life insurance products and annuities pay commissions to your investment adviser representative in his or her separate capacity as an insurance agent. This presents a conflict of interest to your investment adviser representative as he or she will be more inclined to recommend you place your assets in life insurance, annuity products or an advisory account depending on which would pay them more. As such, your investment adviser representative acting in his or her separate capacity as a life insurance agent, can suggest that you implement recommendations which include purchasing life insurance or annuities products which are marketed and wholesaled by AE. This receipt of commissions creates an incentive for the investment adviser representative to recommend those products in his or her separate capacity as a life insurance agent. Likewise, the marketing-override payments received by AE also create an incentive for EdgeRock to encourage the recommendation of life insurance and annuity products marketed and wholesaled by AE.

As a result of the above, the advice rendered to you could be biased. In the event your investment adviser representative will receive a commission in relation to a recommended product, that fact will be disclosed to you. Commissions are built into the product pricing and are not directly paid by you in the form of a reduction of premium amount. Commissions are set by the applicable life insurance carrier but will typically range from 4-7.5% of the total premium.

Investment adviser representatives are eligible to receive incentives and other compensation based on achieving life insurance carrier and third-party (which include affiliates of AE) criteria related to life insurance/annuity transactions, including your life insurance product purchase. These incentives are determined by criteria set by the life insurance carrier or third party. The incentives likely include, but are not limited to: gifts, meals, or entertainment of reasonable value, participation in bonus programs, reimbursement for training, marketing, educational efforts, advertising, or travel expenses to conferences or events sponsored by third parties or life insurance carriers.

EdgeRock and our representatives always endeavor to put the interests of each of our clients first. You are under no obligation to implement any life insurance or annuity transaction through your investment adviser representative in his or her capacity as a life insurance agent or utilize life insurance or annuity products wholesaled by AE.

EdgeRock has taken steps to manage these conflicts of interest by requiring that each investment adviser representative (i) only recommend life insurance and annuities when in the best interest of the client and without regard to the financial interest of EdgeRock and its investment adviser representative or life insurance agents, (ii) not recommend life insurance and/or annuities which result in your investment adviser representative acting as an life insurance agent and/or an affiliated life insurance agency receiving unreasonable compensation related to the recommendation and (iii) disclose in writing to a client any material conflicts of interest related to life insurance or annuity recommendations.

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

We have adopted a Code of Ethics for all employees of the firm describing our high ethical standards of business conduct, including those of applicable Federal and State securities laws. Our Code of Ethics includes policies and procedures relating to maintaining the confidentiality of client information, a prohibition on insider trading, and personal securities trading and review procedures, among other things. Our employees must certify at least annually their receipt, understanding and compliance with our Code of Ethics. A copy of our Code of Ethics is available to our advisory clients and prospective clients, upon request to the Chief Compliance Officer, at the firm's principal office address.

Personal Securities Transactions Disclosure

At times, Associated persons of EdgeRock buy or sell for their personal accounts, investment products identical to those recommended to clients. This can create a conflict of interest. It is the express policy of EdgeRock that all persons associated in any manner with my firm must place clients' interests ahead of their own when implementing personal investments. EdgeRock and its associated persons will not buy or sell securities for their personal account(s) where their decision is derived, in whole or in part, by information obtained as a result of employment or association with our firm unless the information is also available to the investing public upon reasonable inquiry.

To eliminate or mitigate potential conflicts of interest, we have developed written policies and procedures and a Code of Ethics that include personal investment and trading policies for our representatives, employees and their immediate family members (collectively, associated persons):

- Associated persons cannot prefer their own interests to those of EdgeRock clients.
- Associated persons cannot purchase or sell any security for their personal accounts prior to implementing transactions in the same securities for client accounts.
- Associated persons cannot buy or sell securities for their personal accounts when those decisions are based on information obtained as a result of their employment, unless that information is also available to the investing public upon reasonable inquiry.
- Associated persons are prohibited from purchasing or selling securities of companies in which any client is deemed an "insider".
- Associated persons are generally prohibited from serving as board members of publicly traded companies

unless an exception has been granted to the Chief Compliance Officer of EdgeRock.

- Associated persons must receive pre-clearance from EdgeRock's Chief Compliance Officer for reportable securities.

Any associated person not observing our policies is subject to sanctions up to and including termination.

Review of Accounts

While the underlying securities within EdgeRock Wrap Program accounts are continually monitored, these accounts are reviewed typically each quarter, but no less frequently than annually by EdgeRock. Accounts are reviewed in the context of each client's stated investment objectives and guidelines, as well as their assets under management. More frequent reviews may be triggered by material changes in variables such as the client's individual circumstances, or the market, political or economic environment.

In addition to the monthly or quarterly statements and confirmations of transactions that Investment Supervisory Services clients will receive from their custodian, EdgeRock may provide written quarterly reports summarizing account performance, balances and holdings. We urge clients to compare reports received from their custodians to those received from EdgeRock.

Client Referrals and Other Compensation

EdgeRock does not receive any economic benefit, directly or indirectly from any third party for advice rendered to EdgeRock clients.

It is EdgeRock's policy not to accept or allow our related persons to accept any form of compensation, including cash, sales awards or other prizes, from a non-client in conjunction with the advisory services we provide to our clients.

EdgeRock Marketing LLC invoices both EdgeRock Capital LLC and EdgeRock Wealth Management LLC for the upcoming year's marketing budget. EdgeRock Marketing LLC buys leads from third parties and refers them to EdgeRock Capital and EdgeRock Wealth Management. When a client is introduced to EdgeRock by either an unaffiliated or an affiliated solicitor, EdgeRock pays that solicitor a referral fee in accordance with the requirements of Rule 206(4)-3 of the Investment Advisers Act of 1940, and any corresponding state securities law requirements. Any such referral fee will be paid solely from the Registrant's investment management fee and will not result in any additional charge to the client. If the client is introduced to EdgeRock by an unaffiliated solicitor, the solicitor, at the time of the solicitation, will disclose the nature of his/her/its solicitor relationship, and will provide each prospective client with a copy of EdgeRock's current Form ADV Part 2A and a copy of the written disclosure statement from the solicitor to the client disclosing the terms of the solicitation arrangement between EdgeRock and the solicitor, including the compensation to be received by the solicitor from EdgeRock. EdgeRock has a solicitor agreement in place with Financial Insight Technology, Inc. d/b/a SmartAsset.

Financial Information

EdgeRock does not require nor solicit prepayment of more than \$1,200 in fees per client six months or more in advance, and therefore does not need to include a balance sheet with this brochure. We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to our clients and we have not been the subject of a bankruptcy proceeding.