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FORM ADV PART 2A. BROCHURE

This brochure provides information about the qualifications and business practices of Redrock Wealth Management, LLC. If you have any questions about the contents of this brochure, please contact us at 702-987-1607 or at greg@redrockwealth.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 Redrock Wealth Management, LLC is also available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for Redrock Wealth Management, LLC is 134562.

Redrock Wealth Management, LLC is a Registered Investment Adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

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Material Changes

Annual Update

The Material Changes section of this brochure will be updated annually or when material changes occur since the previous release of the Firm Brochure.

Material Changes since the Last Update

Since the Firm's last Brochure update of October 20th, 2016, the firm has moved offices. Our new address is 9484 W Flamingo Rd #205, Las Vegas, NV 89147. The firm has also ceased using the d/b/a "Finacuity".

Full Brochure Available

Whenever you would like to receive a complete copy of the current Firm Brochure, please contact us by phone at 702-987-1607 or at greg@redrockwealth.com.

Advisory Business

Form ADV Part 2A, Item 4

Redrock Wealth Management, LLC ("Redrock Wealth Management" "We" or "Firm" "Redrock Wealth Management") registration as an investment adviser became effective with the State of Nevada on March 29, 2012. Gregory David Phelps (CRD number 2615524) is Managing

Member and Chief Compliance Officer of Redrock Wealth Management. Mr. Phelps owns one hundred (100%) percent of the firm. The Firm is not publicly owned or traded. There are no indirect owners of the Firm or intermediaries who have any ownership interest in the Firm.

Redrock Wealth Management provides individuals and families on-going financial planning and investment management services, and retirement plan management services to small businesses.

Redrock Wealth Management offers financial planning and investment management services as follows:

Private Client Services

A client will typically receive the following services:

- An initial in-person two hour data gathering meeting;
- Two hour presentation that includes a comprehensive analysis of the client's existing financial status with recommendations;
- Two hour in-person investment education and plan follow up;
- Highly customized, integrated, and tax efficient portfolio solutions;
- Social Security maximization analysis and planning;
- Retirement income coordination among various taxable and tax deferred accounts;
- Integrated approach to tolerance based rebalancing;
- Tax loss harvesting;
- Quarterly fiduciary investment reviews;
- In person semi-annual financial and investment plan reviews, and additional meetings as requested;
- Annual executive summary updates;
- Prompt email and phone response; and
- Concierge services, such as notary assistance, residence homesteading, and lost money searches.

In providing investment management services to a client, the client's account is managed individually according to the client's investment objectives and risk tolerance. The firm uses discretionary authority to conduct transactions in a client's account. A client authorizes the firm in the advisory agreement to select, buy and sell securities in the client's account without obtaining the client's prior consent to the transaction. All securities are held at an independent custodian. Redrock Wealth Management does not have the authority to make withdrawals from a client's account subject to the exception of the firm's advisory, planning, and investment management fees as fully explained in Item 5 of this brochure.

Project Or Hourly Financial Planning Services

From time to time, the Firm may provide a client financial and retirement planning consultative services on an hourly or project plan basis. Such services include:

- General financial planning consultations,
- Creation of a financial plan including:
 - Client's personal financials,

- Financial objectives and life goals,
- Recommendations to help the client meet their respective financial goals which take both money and planning to achieve.

Retirement Plan Consulting Services

We offer services to both plan sponsors and participants of retirement benefit plans.

Plan Design and Provider Consulting

We may assist with various aspects of the plan design. We evaluate bundled or unbundled retirement plan service providers, including record keepers, third party administrators, trustees, custodians, investment companies and legal and accounting professionals.

Investment Services

We offer assistance in creating and establishing a plan's asset allocation and in evaluating, and monitoring investment options. This may include reviewing appropriate investment options for the plan, asset classes and investment styles, evaluating and recommending investment managers, types and selection of investment options. We may also conduct periodic reviews of the plan's investments to evaluate performance, risk characteristics and expenses and recommend changes where appropriate.

Employee Education Services

We provide services to encourage participation and help plan participants choose an appropriate deferral rates and investment selections by holding enrollment meetings and providing online or printed educational materials. We may also work directly with plan participants to help them evaluate their retirement savings goals and implement appropriate contribution amounts and investments available in the plan.

Fiduciary Services

To assist plan sponsors in fulfilling their ERISA fiduciary responsibilities, we may compare a plan's services, investments, features and fees against those of comparable plans in similar-sized organizations, provide educational resources to help plan sponsors understand and meet their fiduciary obligations and provide detailed listings and explanations of all fees paid by the plan and participants to service providers and identify appropriate opportunities for cost savings.

The following services are considered fiduciary consulting services:

- Plan design consulting
- Investment Policy Statement development and refinement
- Asset allocation and model portfolios
- Manager evaluation and selection
- Performance monitoring and reporting
- Qualified Default Investment Alternative evaluation and recommendation
- Fiduciary investment reviews
- Participant advisory services

Redrock Wealth Management acknowledges that in performing the fiduciary consulting services listed above that it is acting as a "fiduciary" as such term is defined under either Section 3(21) or

Section 3(38) of the Employee Retirement Income Security Act of 1974 (“ERISA”). Depending on client needs, Redrock Wealth Management may act as a 3(21) fiduciary and provide non-discretionary investment advice only. Advisor acts in a manner consistent with the requirements of a fiduciary under ERISA if, based upon the facts and circumstances, such services cause Advisor to be a fiduciary as a matter of law. However, in providing the fiduciary consulting services, Advisor (a) has no responsibility and does not (i) exercise any discretionary authority or discretionary control respecting management of the client’s retirement plan, (ii) exercise any authority or control respecting management or disposition of assets of the client’s retirement plan or (iii) have any discretionary authority or discretionary responsibility in the administration of the client’s retirement plan or the interpretation of retirement plan documents, (b) is not an “investment manager” as defined in Section 3(38) of ERISA and does not have the power to manage, acquire or dispose of any plan assets and (c) is not the “Administrator” of the client’s retirement plan as defined in ERISA.

If the clients needs a 3(38) fiduciary investment manager, ADVISOR may act in that capacity in lieu of being a 3(21) fiduciary. This will be determined in writing between the ADVISOR and CLIENT in advance of their engagement.

The following services are considered non-fiduciary services:

- Plan Provider Consulting
- Employee Enrollment Meetings
- Participant Education
- Plan Benchmarking
- Fiduciary Education
- Fee Reporting and Analysis

All recommendations of investment options and portfolios are submitted to the client for ultimate approval or rejection. Therefore, it is always the client’s responsibility to make changes to the plan itself.

In the event a client contracts with Redrock Wealth Management for one-on-one consulting services with plan participants, those services are consultative in nature and do not involve Redrock Wealth Management implementing recommendations in individual participant accounts. It is the responsibility of each participant to implement changes in the participant’s individual accounts. We can also meet with individual participants to discuss their specific investment risk tolerance, investment time frame and investment selections.

Redrock Wealth Management does not serve as administrator or trustee of the plan. Redrock Wealth Management does not act as custodian for any client account or have access to client funds or securities (with the exception of some accounts having written authorization from the client to deduct our fees). In addition, we do not implement any transactions in a retirement plan or participant’s account. For retirement plan consulting services, the retirement plan or the plan participant who elects to implement any recommendations made by us is solely responsible for implementing all transactions.

Redrock Wealth Management will disclose to you, to the extent required by ERISA Regulation Section 2550.408b-2(c), any change to the information that we are required to disclose under ERISA Regulation Section 2550.408b-2(c)(1)(iv) as soon as practicable, but no later than sixty (60) days from the date on which we are informed of the change (unless such disclosure is

precluded due to extraordinary circumstances beyond our control, in which case the information will be disclose as soon as practicable, but no later than sixty (60) days from the date on which we are informed of the change (unless such disclosure is precluded due to extraordinary circumstances beyond our control, in which case the information will be disclose as soon as practicable).

Termination of Agreements

At the commencement of the financial and investment advisory relationship, clients may terminate their contracts with Redrock Wealth Management within five business days with written notice of intent to terminate without the imposition of any penalty or fee. Subsequently, clients may terminate the agreement with thirty (30) days written notice of intent to terminate. Accounts closed during a calendar quarter will have the advisory fee pro-rated for the period during which the account was open. As fees are billed and paid on a quarterly basis in advance, Redrock Wealth Management will make a refund on a pro-rated basis of all unearned, pre-paid fees. Redrock Wealth Management may also terminate an agreement, provided thirty (30) day written notice of intent to terminate is delivered to the client.

The Firm does not participate in any wrap programs.

The firm manages assets on a discretionary basis in the approximate amount of \$80,000,000.

Fees and Compensation

Form ADV Part 2A, Item 5

The specific manner in which fees are charged is established in a client's written agreement with Redrock Wealth Management. Redrock Wealth Management bases its fees on a percentage of assets under management, hourly charges, and fixed fees. Unless other fee payment arrangements are made in advance, the client must provide written authorization to the custodian permitting the debiting of Redrock Wealth Management's advisory fees from their account.

Fees may be reduced or waived in certain circumstances and are negotiable based on the complexity of the client's situation, the composition of the client's account, the relationship of the client with the firm, the client's primary advisor, and the total amount of assets under management for the client.

Redrock Wealth Management is not compensated on the basis of a share of capital gains on or capital appreciation of the funds or any portion of the funds of the clients. Redrock Wealth Management does not receive commissions or trails from mutual funds or brokerage firms - this applies to, but is not limited to, loads and 12b1 fees. Redrock Wealth Management is a fee-only financial advisor firm.

Private Clients under a wealth advisory services agreement will be charged a fixed flat annual fee of \$3,000 for investment advisory, planning, and management services. In addition to the fixed flat annual fee, the client will be charged a tiered percentage based fee depending on the amount of assets RWM directly manages on their behalf as follows:

Assets Under RWM Direct Management			% Fee
\$0	to	\$1,000,000	0.65%
\$1,000,001	to	\$3,000,000	0.55%
\$3,000,001	to	\$5,000,000	0.45%
\$5,000,001	to	-	<i>negotiable</i>

For clients with an engagement agreement prior to this amended ADV Part 2A, Redrock Wealth Management may continue to charge its fee according to the fee schedule in place at the time the client entered into their engagement with the firm. However, Redrock Wealth Management may amend the client's fee schedule to the above upon schedule with reasonable notice to the client, and subject to the client's consent and right to terminate the engagement.

Financial Planning Project/Consultative Services Fee

The hourly fees for consultations or project financial planning are based on an hourly rate of \$150 to \$350, depending upon the advisor performing the work. For hourly and project planning engagements, an estimate based upon the complexity of the client's particular situation and the involvement on the part of the financial advisor will be provided to the client prior to entering into an agreement to provide services. Fixed fees for individual financial plan projects generally cost approximately \$1,500 - \$3,500, depending upon, among other things:

- The complexity of the client's needs,
- The scope of the engagement,
- The relationship of the client with Redrock Wealth Management, and
- The amount and nature of the research required to perform the services.

Fee Billing

For clients under a wealth advisory services agreement, one quarter of the annual fee is charged, in advance, at the beginning of each quarter. The fee is generally deducted directly from the client's account(s) held at the independent custodian unless other direct payment arrangements have been arranged. Fees are assessed in advance and based on the account(s) value at the end of the preceding quarter. Each time the fee is deducted from a client's account, Redrock Wealth Management provides the client a billing summary in Redrock Wealth Management's web portal detailing the fee deducted, the time period covered by the fee, and the how the fee is calculated.

\$100 will be charged to a client for missing an hourly or project planning appointment. This policy will account for Redrock Wealth Management's lost time and is not a penalty.

Unless other fee payment arrangements are made in advance, hourly and project planning clients make payment in either cash, check, or credit card form at the time services are provided.

Other Fees

All fees paid to Redrock Wealth Management for investment advisory services are separate and distinct from the fees and expenses charged to the client in connection with any transaction to purchase or sell any investment, or any expense directly associated with management of the portfolio.

Fees at Termination

A client may terminate any agreement upon written notice to Redrock Wealth Management. Upon termination of an engagement, the advisory fee will be pro-rated from the date of termination through the end of the current quarter. Any unearned fee paid in advance will be promptly refunded to the client. For hourly consultations and project financial planning engagements, Redrock Wealth Management bills the client for any work completed up through the effective date of termination of the agreement. Any fees owed by the client at the time of termination become immediately due. Any unearned fee paid in advance will be promptly refunded to the client. Redrock Wealth Management specifically reserves the right to terminate any engagement that remains sixty (60) days past due.

If a client does not receive a Brochure at least 48 hours prior to entering into an advisory agreement, the client has a right to terminate the contract without penalty or fee within five business days after entering into the contract.

Performance-Based Fees and Slide-By-Slide Management

Form ADV Part 2A, Item 6

Fees are not based on a share of the capital gains or capital appreciation of managed securities. Redrock Wealth Management does not use a performance-based fee structure.

Types of Clients

Form ADV Part 2A, Item 7

Description

Redrock Wealth Management works with individuals, pension and profit sharing plans, corporations and other business entities. Client relationships vary in scope and length of service.

Methods of Analysis, Investment Strategies and Risk of Loss

Form ADV Part 2A, Item 8

Redrock Wealth Management uses a mix of risk appropriate securities consisting mainly of mutual funds and index based ETFs. In conducting the analysis of securities, the firm uses a number of tools and resources including commercially available software technology, securities

rating services, general market and financial information, and due diligence reviews. The principal sources of information include major financial publications and resource tools, security analysis and benchmarking software, prospectuses, and various financial and business resources including filings with the Securities and Exchange Commission. The main risk associated with our methods of security analysis is the potential for reliance on inaccurate information.

Redrock Wealth Management's investment strategy and guidance is primarily based on long-term portfolio strategies which incorporate the principles of modern portfolio theory. Redrock Wealth Management's investment approach is firmly rooted in the belief that markets are "efficient", and that investors' returns are determined principally by asset allocation decisions. Redrock Wealth Management develops diversified portfolios, primarily through the use of less actively managed, asset class mutual funds (both open end funds and exchange traded funds) that are available generally to institutional investors and clients of a network of carefully selected advisors and separate account managers who follow a disciplined asset allocation investment approach.

All investment programs have certain risks that are borne by the investor. These risks include, among other things; loss of principal, a reduction in earnings (including interest, dividends and other distributions), and the loss of future earnings occurring from market risk, interest rate risk, issuer risk, and general economic risk.

Disciplinary Information

Form ADV Part 2A, Item 9

Legal and Disciplinary

Neither Redrock Wealth Management nor any of its associated personnel have been the subject of any legal or disciplinary event pursuant to the Investment Advisers Act or state statutes.

Other Financial Industry Activities and Affiliations

Form ADV Part 2A, Item 10

Redrock Wealth Management is a member of the National Association of Personal Financial Advisors (NAPFA). NAPFA is the nation's leading organization dedicated to the advancement of fee-only financial planning. The firm pays an annual membership fee to NAPFA for services that include training, compliance support, and operational support. This enhances the firm's ability to provide quality service and financial advice to the investing public. NAPFA members must adhere to ethical guidelines and must meet experiential and education requirements.

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

Form ADV Part 2A, Item 11

Redrock Wealth Management has adopted a Code of Ethics 1. This Code of Ethics is enforced by Mr. Phelps, the chief compliance officer of the firm. The Code of Ethics discusses the expected professional behavior to which all access persons shall be required to adhere. Also, the Code of Ethics creates standards in relation to personal securities transactions. The firm's Code of Ethics is available to clients and prospective clients upon request.

Because of the types of services offered and the securities typically recommended (mutual funds, Exchange Traded Funds or ETF's, or fixed income securities) it is unlikely that any security holding by the firm or any associated person would have an impact on the market and would not likely have any influence on any recommendation.

General policies and procedures

It is the express policy of Redrock Wealth Management that no person employed by the firm may benefit, either directly or indirectly from recommendations made to or transactions placed by or on behalf of advisory accounts.

Employees of the firm are generally precluded from buying or selling securities for their personal portfolio(s) if their decision is substantially derived, from information obtained through his or her employment unless the information relating to the investment decision is also available to the investing public on reasonable inquiry.

Redrock Wealth Management expressly prohibits any employee from placing his or her interests ahead of its advisory clients.

Redrock Wealth Management monitors personal trading activity and this activity is reviewed quarterly to ensure compliance with the firm's policies and procedures.

Redrock Wealth Management emphasizes the unrestricted right of the client to decline to implement any advice rendered.

Redrock Wealth Management emphasizes the unrestricted right of the client to select and choose any broker or dealer and/or insurance company they wish. Redrock Wealth Management directs its employees that they must abide by and act in accordance with all applicable Federal and State regulations. Individuals who fail to comply with the firm's policies and procedures may be subject to sanctions and disciplinary action, including termination of employment.

Brokerage Practices

Form ADV Part 2A, Item 12

Clients will establish an account at a broker for execution of securities transactions and custodial services. Redrock Wealth Management may in various circumstances decide to utilize or recommend the use of TD Ameritrade, a national discount brokerage firm, as broker and custodian.

Redrock Wealth Management participates in the institutional customer program offered by TD Ameritrade Institutional. TD Ameritrade Institutional is a division of TD Ameritrade Inc., member FINRA/SIPC ("TD AMERITRADE"), an unaffiliated SEC-registered broker-dealer and FINRA member. TD Ameritrade offers to independent investment advisors services which include custody of securities, trade execution, clearance and settlement of transactions. Redrock Wealth Management receives some benefits from TD Ameritrade through its participation in the program.

TD Ameritrade has access to no load mutual funds as well as individual securities at discounted transaction costs. This arrangement allows the client to have access to mutual funds at a generally lower cost and permits the client's investments to be maintained in one location (minimizing administrative burdens for the client and the Advisor). We believe TD Ameritrade's transaction costs are very competitive, however, the client may pay more or less with other brokerage firms. In light of the services available through TD Ameritrade, Redrock Wealth Management might in certain circumstances be deemed to be receiving a benefit in the form of research, market information, and/or administrative services. When appropriate, research obtained from TD Ameritrade may be used to service all of Redrock Wealth Management's clients. The client is free to select the broker or other service provider of his or her choosing. While the firm believes the service providers used by the firm provide benefits to the client, each client is expressly advised to evaluate any recommended broker or other service provider to ensure that the broker or service provider meets the clients' needs and to evaluate the rates or charges so that they are acceptable to the client. Redrock Wealth Management does not receive commissions or trails from mutual funds or brokerage firms. This applies to, but not limited to, loads and 12b1 fees. In addition, as the customer is responsible for selecting the broker for any and all securities transactions, the firm does not typically negotiate the commission for or on behalf of the client.

Redrock Wealth Management participates in TD Ameritrade's institutional customer program and Redrock Wealth Management may require clients to maintain accounts with TD Ameritrade/ recommend TD Ameritrade to clients for custody and brokerage services. There is no direct link between Redrock Wealth Management's participation in the program and the investment advice it gives to its clients, although Redrock Wealth Management receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services provided without cost or at a discount: duplicate client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving advisor participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts); the ability to have advisory fees deducted directly from client accounts; access to an electronic communications network for client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to Redrock Wealth Management by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by Redrock Wealth Management's related persons and may also pay or reimburse expenses including travel, lodging, meals and entertainment expenses) for Redrock Wealth Management's personnel to attend conferences or meetings relating to the program or to TD Ameritrade's advisor custody and brokerage services generally. Some of the products and services made available by TD Ameritrade through the program may benefit Redrock Wealth Management but may not benefit its client accounts. These products or services may

assist Redrock Wealth Management in managing and administering client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help Redrock Wealth Management manage and further develop its business enterprise. The benefits received by Redrock Wealth Management or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. Clients should be aware, however, that the receipt of economic benefits by Redrock Wealth Management or its related persons in and of itself creates a potential conflict of interest and may indirectly influence Redrock Wealth Management's choice/recommendation of TD Ameritrade for custody and brokerage services.

Review of Accounts

Form ADV Part 2A, Item 13

Private Client accounts are reviewed at least annually. The review is conducted by the investment professional responsible for the account management in association with the client. The review process consists of each of the following elements (if and as necessary):

- A comparison of the portfolio to the client's goals and objectives;
- An evaluation of the investment strategy relative to any change in client circumstances;
- A review of the assets in the portfolio.

Clients are provided, no less than quarterly, statements from the directed custodian, and performance reports from Redrock Wealth Management. Clients will also be provided with online internet access to their investment accounts upon request to Redrock Wealth Management.

Client Referrals, Solicitor & Co-Advisory Agreements, and Other Compensation

Form ADV Part 2A, Item 14

Incoming Referrals

Redrock Wealth Management has been fortunate to receive many new client referrals over the years. The referrals come from current clients, estate planning attorneys, accountants, friends, and other similar sources. The firm does not compensate referring parties for these referrals, directly or indirectly.

Redrock Wealth Management also receives calls or emails from members of the public who have visited the website of the National Association of Personal Financial Advisors (NAPFA), or Dimensional Fund Advisors (DFA), or the Paladin Registry, and have searched for member or participating firms by utilizing the resources on the respective websites of those organizations. The firm does not pay for these referrals nor is there any fee-sharing arrangement reflective of a solicitor agreement.

Outgoing Referrals

Redrock Wealth Management does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

Solicitor and Co-Advisory Agreements

RWM may enter into co-advisory agreement or solicitor agreements with unaffiliated registered investment advisors, providing for the sharing of fees and services, to certain clients desiring joint services. All such agreements are subject to written client consent including the disclosure of: total fees to the client and the advisors' fee sharing agreement. When RWM enters into a co-advisory or solicitor agreement, the client is charged fees according to RWM's standard published fee schedule. Clients do not pay additional fees due to obtaining the services of two firms.

Custody

Form ADV Part 2A, Item 15

All client assets are held at unaffiliated, qualified custodians. Redrock Wealth Management will never have custody of clients' funds or securities, except for, the limited authority to deduct its fees from a client's account. Although, the Firm is considered to have custody over a client's account because of this authority, Redrock Wealth Management is not required to meet the financial requirements for custodial advisors because it employs the required safeguards. The custodians provide account statements at least quarterly directly to the clients at their physical or email address of record. Each time a fee is directly deducted from a client account, Redrock Wealth Management sends the qualified custodian an invoice of the fee to be deducted and provides the client a statement itemizing the fee. Clients are urged to compare the account statements received directly from their custodians with the information provided by the Firm.

Investment Discretion

Form ADV Part 2A, Item 16

Discretionary Authority for Trading

Redrock Wealth Management accepts discretionary authority to manage securities accounts on behalf of clients so that the firm may promptly implement the investment objectives the client has approved in writing. With discretionary authority, Redrock Wealth Management has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, the amounts, and the timing of transactions in client's account(s).

Limited Power of Attorney

A limited power of attorney is a trading authorization for this purpose. The client signs a limited power of attorney authorization with the custodian so that Redrock Wealth Management may execute trades based on the client's investment objectives.

Voting Client Securities

Form ADV Part 2A, Item 17

The Firm will vote proxies for securities held in the client's managed account with TD Ameritrade. The Firm's proxy voting policy is designed to ensure that we carry out those duties related to voting responsibilities with the best interest of the clients in mind. The Firm, as a matter of policy and as a fiduciary to our clients, will take responsibility for voting proxies for portfolio securities consistent with the best economic interest of the client.

Our policy and practice includes the responsibility to monitor corporate actions, receive and vote client proxies and disclose any potential conflicts of interest as well as making information available to clients about the voting of proxies for their portfolio securities and maintaining relevant and required records.

Clients can request a copy of the Firm's proxy voting policy and how securities were voted by contacting Greg Phelps. In response, the Firm will provide a written response to the client with the information requested.

Requirements for State-Registered Advisers

Form ADV Part 2A, Item 19

Redrock Wealth Management is a State-Registered Investment Adviser and is required to provide you with certain information or disclosures about its principals. Further information can be found in Mr. Phelps and Mr. Murray's ADV Part 2Bs.

Neither Mr. Phelps nor Mr. Murray have material disclosures related to:

An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:

- An investment or an investment related business or activity;
- Fraud, false statement(s), or omissions; (c) theft, embezzlement, or other wrongful taking of property;
- Bribery, forgery, counterfeiting, or extortion; or
- Dishonest, unfair, or unethical practices.

An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:

- An investment or an investment related business or activity;
- Fraud, false statement(s), or omissions;
- Theft, embezzlement, or other wrongful taking of property;
- Bribery, forgery, counterfeiting, or extortion; or
- Dishonest, unfair, or unethical practices.

