



Roche Financial Partners LLC

475 Wall Street
Princeton, NJ 08540
609-575-6762
info@rochepartners.com
www.rochepartners.com
10/11/2021

This brochure provides information about the qualifications and business practices of Roche Financial Partners LLC. If you have any questions about the contents of this brochure, please contact us at 609-575-6762 or info@rochepartners.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 Roche Financial Partners is also available on the SEC's website at www.adviserinfo.sec.gov. Roche Financial Partners is a Registered Investment Advisor however, registration does not imply a certain level of skill or training.

Additional information about Roche Financial Partners LLC also is available on the SEC's website at www.adviserinfo.sec.gov.

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Item 4: Advisory Business

Roche Financial Partners is an independent wealth management firm that specializes in providing continuous financial oversight and guidance as well as investment management advisory services. We provide families with a personal financial advocate to help guide them through all life's decisions that affect them financially. We build long-term, consultative relationships with our clients to better understand and advise on their total net worth. We provide effective investment management services that increase returns, control costs, and reduce volatility. We are fiduciaries, which means that we are held to the highest ethical standards in the financial services industry. We receive no sales commissions, no product incentives and no third party payments.

We are not a broker -- we are complete, holistic wealth advisors. We are not affiliated with any firm that might cause a conflict of interest -- we are completely independent. We are not compensated for selling investments - - we charge a fee for ongoing advice and implementation. We don't just recommend suitable investments -- we are held to fiduciary standards that legally require us to put our clients' interest first. We are not only about investments -- we provide ongoing guidance all decisions that affect you financially. We do not try to "time the market" or pick "hot stocks" -- we follow the proven, long-term principles of wealth management investing.

Roche Financial Partners LLC was founded in November 2004 by Robert Gregov, CFA, CFP®. Robert remains President of the firm and is the sole owner.

Roche designs, implements, and monitors personalized wealth management strategies for individuals and their families. Our clients rely on us to be more than their investment manager, although that is one of our primary responsibilities. They entrust us to be their financial advocate in a world filled with an overwhelming number of decisions that affect them financially. While our engagement with each client will be customized, our objectives are always the same:

- Restore order and control
- Create financial peace
- Improve specific quality of life issues
- Assure clarity in financial decision making

We do not use a wrap fee program; we personalize our portfolios for each client.

Current assets under management for the firm as of June 29, 2018 are \$38,972,135. All assets are discretionary.

Item 5: Fees and Compensation

Overview—Fee Only

Roche Financial Partners is a fee only financial planning firm. Our only sources of compensation are the fees paid to us by our clients. Fee only planners sell no products and receive no commissions. "Fee only" planners are different from "fee based" planners in that fee based planners sell products, receive commissions, and charge fees. Being "fee only" eliminates one potential conflict of interest when brokerage houses, insurance companies, and banks offer a higher commission to their agents for selling one product over another.

The different fee structures are designed to provide a fair and reasonable fee for clients who have different needs, income, and types of wealth. The purpose of the different fee structures is to reflect the client who simply wants some financial advice on specific questions or topics, the client who wants advice and/or implementation on a specific project, and a client who wants on-going planning advice on his assets, liabilities, and responsibilities. Fees may be calculated using one or more of the options below and is customized for each client requirement:

Hourly or Project Fee

Typical hourly fees range from \$250 to \$400 per hour

An hourly fee may be charged for consultation, planning, or investment advice. On some occasions, a flat fee will be charged for a specified project. The advice given is for that meeting or project only and no on-going help, advice, or implementation is required from the advisor after the meeting or project has ended unless agreed to in advance.

Financial Advocate Fixed Annual Fee

Typical fixed fees range from \$250 to \$1,000 per month

Roche Financial Partners LLC - Form ADV Part 2

The Fixed Annual Fee for financial planning services is an engagement that includes ongoing and continuous financial oversight and guidance on all topics that affect you financially. It is through this type of relationship that our clients receive the greatest service and benefits.

The Fixed Annual Fee includes at least four scheduled appointments throughout the year, during which topics are addressed such as cash flow management, investment positioning, tax planning, and estate preservation. The appointments can be in-person or via telephone. Over the course of the year, clients receive written recommendations, and our on-going assistance with implementation. In addition to scheduled appointments, this open-ended retainer allows clients to contact us at any time, for any reason, at no additional cost.

The Fixed Annual Fee is intended to provide you with:

- Ongoing access to timely analysis and continuous oversight and guidance
- Better, more efficient service at critical times of your life and as market circumstances change
- Benefits of building a long term relationship with a financial advocate who knows your circumstances, history and objectives
- Assurance of our objectivity due to absence of conflicts related to commission payments or referral fees
- Greater financial peace knowing you and your family have access to an objective, professional advisor with a steady eye on your portfolio and investment concerns

The Fixed Annual Fee is determined annually and considers the scope and complexity of services needed. Fees are paid either monthly, quarterly, or annually as agreed upon with the client.

Investment Management Fee

Typical investment management fees range from 0.50% to 1.25% of assets managed

The Investment Management Fee is for portfolio design and ongoing management of all your investment and retirement accounts directly managed by Roche Financial Partners on a discretionary basis.

The Fee is calculated by multiplying the fee rate by assets under management as of the end of the quarter. Fee quarters end on the months March, June, September and December. The fee is deducted from your investment account. All investment assets including brokerage accounts, mutual fund accounts, retirement accounts, annuities, and any other assets within client's total investment portfolio. We receive no sales commissions, no product incentives and no third party payments. We are not compensated for selling investments...we charge a fee for advice and implementation.

Our service does not include drafting legal documents. Additional fees for estate planning and other attorneys may be required. Also, fees will be incurred by the mutual funds and exchange traded funds used in your portfolio, along with trading fees incurred by broker dealer.

The fee is calculated on an aggregate basis and is payable in quarterly installments in advance. Assets under management are determined on a quarterly basis. For each account within the total of Assets Under management, valuation is determined, as near as practicable, as of the last business day of the quarter ended for which tracking is provided. Assets under management include any investment position for which Roche provides investment management on an ongoing and discretionary basis. Discretionary Assets include assets that are directly under the discretionary authority of Roche and may be traded through the client's designated broker-dealer or other institution where Client has given Roche trading authority.

Clients can terminate this agreement within five (5) business days without penalty for a full refund. After such time, the relationship will continue unless either party requests to terminate this agreement with a written notice served to the other party. If Roche decides to terminate relationship, Roche shall calculate fees already accrued and earned in connection with this agreement, and shall refund to Client any amounts held by Roche over and above this amount. If a Client terminates relationship, the quarterly fee for the current quarter will not be returned. Client can at any time terminate their relationship with the advisor by contacting Charles Schwab customer service and asking them to delink their account from being associated with Roche Financial Partners.

Item 6: Performance Based Fees

Roche Financial Partners does not charge performance based fees to its clients.

Item 7: Types of Clients

Roche Financial Partners offers continuous financial oversight and guidance and investment advisory services to individuals and their families. Nearly every decision you make can affect your financial security, either positively or negatively. We help families secure their financial goals by providing the resources and guidance you need to make the best decisions possible, regardless of situation.

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

Method of Analysis

It is often difficult for individuals to evaluate their overall financial position. When we design a comprehensive wealth plan, you will have a clear picture of where you are today and where you are headed tomorrow.

We will provide a personal report containing your current and projected financial position, retirement analysis, insurance analysis, and more.

We will help you prepare for foreseen events such as retirement and educational expenses and unforeseen events such as disability or a death in the family. Our team will be available to help you analyze financial decisions and maximize financial opportunities as they arise.

Designing a plan involves several steps. Each one is important, and all must be coordinated if your financial plan is to succeed. The five main steps in the process are:

- I. Information Interview and Data Collection
- II. Strategic Analysis and Review
- III. Wealth Plan Design
- IV. Wealth Planning Sessions

Investing Principles

Roche Financial Partners adheres to three important principles when investing your portfolio

Invest each dollar of savings for a purpose

Design a cash flow plan with clear, appropriate, and personalized objectives for each dollar earned, saved, or invested. Your cash flow plan will dictate your investment strategy to ensure proper exposure to the many risks faced when investing.

Build and Maintain Diversified Portfolios

Deciding how to divide wealth among the thousands of possible investment choices is a daunting challenge for even the most experienced investor. Most investors spend too much time selecting individual investments instead of deciding on the correct mix of asset classes and sectors. Portfolios should be invested across a diversified mix of up to 25 global asset classes and sectors.

Minimize your Total Cost of Investing

Managing your Total Cost of Investing (TCI) is important to successful investing. These costs have a significant impact on the client's net investment return and play a critical role in the probability of realizing your goals. Roche aggressively manages TCI by utilizing low cost index funds, minimizing trading, and controlling taxes.

Stay Disciplined to your Wealth Plan

The appeal of market-timing and chasing performance is strong, but these strategies are rarely successful and typically under-perform portfolios that are constructed through careful asset allocation. Successful investing is a function of patience and discipline – not hasty judgment. At Roche, we will design a custom portfolio to meet your needs and then stay the course for stronger performance.

Investing Strategy

Roche Financial Partners investing strategy includes three phases designed for diversified and efficient portfolios:

Build the Models

1. Asset Class Analysis: Analyze the risk, return, and correlation of over 60 asset classes to build the Roche universe comprised of 25 asset classes
2. Strategic Asset Allocation Models: Using Modern Portfolio Theory, select & combine 5 to 20 asset classes to create strategic asset allocation models

Fill the Models

1. Investment Analysis: Analyze dozens of key investment characteristics on thousands of stocks, bonds, mutual funds, and exchange-traded funds to find the best option for each of the 25 asset classes in the Roche universe
2. Investment Portfolios: Construct the client's investment portfolio by purchasing the products in accordance with the strategic asset allocation models

Select and Rebalance

5. Select and Customize: Select the investment portfolio that best fits the client's risk-return requirements or customize an investment portfolio to meet the client's unique needs
6. Rebalance & Re-evaluate: Rebalance the investment portfolio by optimizing the trade-off between the models' risk-return and allocation versus the costs of trading and taxes

Please remember that different types of investments involve varying degrees of risk, and there can be no assurance that the future performance of any specific investment or investment strategy (including those undertaken or recommended by Roche) will be profitable or equal any historical performance level(s). Future returns could differ significantly and capital loss is possible. Past performance is no guarantee of future results. Any information presented is general in nature and is not intended to provide personal investment advice. The investments or strategies presented do not take into account the investment objectives or financial needs of particular investors. It is important that you consider this information in the context of your personal risk tolerance and investment goals.

Item 9: Disciplinary Information

None

Item 10: Other Financial Industry Activities and Affiliations

No individual(s) at Roche Financial Partners are, or will be, registered as a broker dealer or registered representative of a broker dealer. No individual at Roche Financial Partners are, or will be, registered as a futures commission merchant, commodity pool operator, commodity trading advisor, or an associated person of the foregoing entities.

The founder and President, Robert Gregov, has a related person who currently is employed with a large investment company. This relationship does not create a material conflict of interest with any client. Roche Financial Partners does not receive benefits or compensation in any manner from this firm. In addition, the related person does not receive any benefits or compensation from Roche Financial Partners. Roche Financial Partners does not select other investment advisors for our clients.

Roche Financial Partner's Private Wealth Advisor, Nick Karp, provides tax preparation services independently under wholly owned firm, Wealth Preservation Associates, Inc. All proceeds from this venture will be owned solely by Mr. Karp.

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

Code of Ethics and Professional Responsibility

The seven principles within this Code of Ethics express our recognition of responsibilities to the public, clients, and colleagues. They apply to all employees of Roche Financial Partners and guide us while performing our professional services. A detailed description of our Code of Ethics is available upon request.

Integrity

Roche Employees shall offer and provide professional services with integrity, honesty, and candor, putting the client's interest first to maintain their trust and confidence.

Objectivity

Roche Employees shall be objective in providing professional services to clients demonstrating intellectual honesty and impartiality.

Competence

Roche Employees shall provide services to clients competently and maintain the necessary knowledge and skill to continue to do so.

Fairness

Roche Employees shall perform professional services in a manner that is fair and reasonable to clients, principals, and partners, and shall disclose any conflict of interest.

Confidentiality

Roche Employees shall not disclose any confidential client information without the specific consent of the client to protect the client's privacy.

Professionalism

Roche Employees' conduct in all matters shall reflect credit upon the profession and enhance the quality of service provided.

Diligence

Roche Employees shall act diligently in providing professional services in a reasonably prompt, thorough manner with the appropriate planning and supervision.

Roche Financial Partners does not recommend to clients or buy for client accounts securities in which we have a material financial interest.

Personal Trading of Employees: Preventing Insider Trading & Front-Running

Client and trading files are restricted on a need to know basis and controlled through shared drive access. Independent Advisor Contractors do not see client files for relationships that they do not manage.

Personal Trading Monitored for Front Running and Misuse of Non-Public Information

There is a 30-day trading window where personal trading is not permitted around Roche rebalancing. Insider Trading, that is, use of information private to Roche Financial Partners and accessed during employment at Roche, cannot be used for personal benefit through trading on such information. Trading is monitored on those securities of which Advisor's employees may have non-public information (none at the time of this writing, Roche is not privy to any non-public information and does not maintain a restricted list.). Trading in securities for personal accounts, or for accounts of family members or affiliates, shortly before trading the same securities for clients and thereby receiving better prices is not permitted. This applies to rebalancing only, where the market could potentially move from trading blocks of our client portfolios. Roche monitors trading of our "access persons" who must report their personal securities transactions to our CCO. "Access persons" are any of our

supervised persons who have access to non-public information regarding client transactions or holdings, make securities recommendations to clients or have access to such recommendations, and, for most advisers, all officers, directors and partners. Testing is done against this by reviewing the securities traded personally (reported in the "Transaction Report Form") against the securities traded by Roche. This testing is performed by the CCO quarterly. Securities invested in by Roche are compared to the personal trades of our employees to test for front-running and insider trading. Employees must submit a list of holdings annually (in the "Holdings Report Form") to Roche for review and comparison against our list of invested securities.

Item 12: Brokerage Practices

At the present time Advisor is recommending Schwab Institutional Services. The following factors were taken into consideration in the selection of these broker-dealers:

- Quality of overall execution services provided by the broker-dealer;
- Promptness of execution;
- Provided dedicated telephone lines;
- Creditworthiness and business reputation of the broker-dealer;
- Promptness and accuracy of oral, hard copy or electronic reports of execution;
- Ability and willingness to correct trade errors;
- Promptness and accuracy of confirmation statements;
- Ability to access various market centers;
- The broker-dealer's facilities, including any software provided to the adviser;
- Commissions charged by the broker-dealer;
- Reliability of the broker-dealer;
- Reputation of the broker-dealer;
- Execution and operational capabilities of the broker-dealer and its clearing firm;
- Financial condition of the broker-dealer;

No Soft Dollar benefits are received by or from Schwab Institutional Services

No referrals are received by or from Schwab Institutional Services

Roche Financial Partners recommends Charles Schwab Institutional to act as broker-dealer. If the Client chooses not to use Charles Schwab Institutional, Client may not be able to negotiate terms and arrangements for the account with that broker or dealer, and Roche Financial Partners will not seek better execution services or prices from other brokers or dealers or be able to "batch" client transactions for execution through other brokers or dealers with orders for other accounts managed by Roche Financial Partners. As a result, where applicable, Client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for their account than would otherwise be the case. All fees associated with brokerage and custodial services that may be charged by the Client's designated broker-dealer are entirely separate and distinct from advisory fees charged by Roche Financial Partners. Roche Financial Partners does not receive any form of commission or other compensation from brokerage transactions including research or client referrals.

Roche Financial Partners aggregates, when possible, the purchase and sale of securities for various client accounts. This process called "block trading" provides better trade execution to the client due to the size of the order. If and when the client account is traded solely, this block trading benefit may not be achieved.

Item 13: Review of Accounts

Advisor reviews each managed portfolio daily. It monitors the performance of each investment based on how similar investments have performed, and recommends changes when necessary. The review is completed by Robert Gregov, CFA,CFP® President.

Advisor reviews financial plans on a periodic basis based on annual review meetings or when specific alerts or life changes warrant a review. The review is completed by Robert Gregov, CFA,CFP® President, or designated associat assigned by Robert.

Clients are provided a website with their personal financial account information including account values, positions, and performance. This website is updated daily and is available 24/7 to the client. In addition, all clients receive monthly account statements from their custodian.

Item 14: Client Referrals and Other Compensation

We do not compensate clients or any other individual for referrals.

Item 15: Custody

Roche Financial Partners LLC does not have custody of clients' accounts. All assets are custodied at Charles Schwab Institutional. Please review the Charles Schwab statements on a monthly basis and ask your advisor about any discrepancy between these statements and your personal wealth website.

Item 16: Investment Discretion

Roche Financial Partners manages client accounts on a discretionary basis. The firm's discretion in portfolio management is constrained by the broad contours of our investment discipline, which precludes style drift and ensures a prudent measure of risk management. Roche accepts and implements client restrictions on individual portfolios at any time they are requested by the client.

Item 17: Voting Client Securities

Roche ensures that proxies are voted in the best interests of clients. Roche clients sign documentation asking Roche to vote proxies on their behalf. Roche informs clients about our policies and procedures, gives clients a copy upon request, and discloses to clients how they can obtain information from Roche about proxy votes cast. Roche maintains certain records of their proxy voting activities pursuant to Rule 204-2 in our "activity log".

Item 18: Financial Information

Roche Financial Partners does not maintain custody of clients' funds, and therefore, is not required to maintain a balance sheet. Roche Financial Partners does not have any financial conditions that would impair our ability to meet our contractual commitments to clients.

Item 19: State registered advisors

A. Our principal executive officers are:

a. Robert Gregov

Education

Master of Business Administration (MBA) from Rutgers University

Bachelor of Science from The College of NJ

Certifications

Certified Financial Planner

Chartered Financial Analyst

Business Experience

Roche Financial Partners – Founder and President – 11/2004 to present

Albridge Solutions – Vice President – 7/2003 to 3/2008

Merrill Lynch – Vice President – 7/96 to 6/2003

B. Roche Financial Partners provided financial planning and investment advice. No other business activity is performed by the executives of Roche Financial Partners

C. Roche Financial Partners does not charge performance based fees

- D. Roche Financial Partners nor any of its executives have been found liable in any arbitration claims; or found liable in any civil, self-regulatory, or administrative proceedings for misdealing
- E. Roche Financial Partners nor any management persons have any relationships or arrangements with issuers of securities.

Roche Financial Partners LLC

Form ADV Part 2B – Individual Disclosure Brochure

for

Robert S Gregov

Personal CRD Number: 4899295
Investment Advisor Representative

Roche Financial Partners LLC

313 Commons Way
Princeton, NJ 08540
609-575-6762

Info@rochepartners.com
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Additional information about Robert Gregov is available on the SEC's website at www.advisorinfo.sec.gov

Item 2: Educational Background and Business Experience

Education

Master of Business Administration (MBA) from Rutgers University - 2005
Bachelor of Science from The College of NJ - 1994

Professional Certifications

Certified Financial Planner®
Chartered Financial Analyst

Business Experience

Roche Financial Partners – Founder and President – 11/2004 to Present
Albridge Solutions – Vice President – 7/2003 to 3/2008
Merrill Lynch – Vice President – 7/1996 to 6/2003

Item 3: Disciplinary Information

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business.

Item 4: Other Business Activities

Robert Gregov is not engaged in any investment-related business or occupation (other than this advisory firm)

Item 5: Additional Compensation

Robert Gregov does not receive any economic benefit from any person, company, or organization, other than Roche Financial Partners LLC in exchange for providing clients advisory services through Roche Financial Partners LLC.

Item 6: Supervision

Robert Gregov is the President and Founder of Roche Financial Partners LLC. His actions are supervised and controlled by the compliance procedures established by Roche.

Item 7: Requirements for State Registered Advisors

This disclosure is required by New Jersey securities authorities and is provided for your use in evaluating this investment advisor representative's suitability.

A. Robert Gregov has NOT been involved in any of the events listed below.

- (1) An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
 - a) an investment or an investment-related business or activity;
 - b) fraud, false statement(s), or omissions;
 - c) theft, embezzlement, or other wrongful taking of property;
 - d) bribery, forgery, counterfeiting, or extortion; or
 - e) dishonest, unfair, or unethical practices.
- (2) An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
 - (a) an investment or an investment-related business or activity;
 - (b) fraud, false statement(s), or omissions;
 - (c) theft, embezzlement, or other wrongful taking of property;
 - (d) bribery, forgery, counterfeiting, or extortion; or
 - (e) dishonest, unfair, or unethical practices.