

Rockbridge Investment Management, LLC

CRD#115754

Form ADV Part 3

March 2021

220 South Warren Street, 9th Floor

Syracuse, NY 13202

Telephone (315) 671-0588

Website www.rockbridgeinvest.com

Item 1. Introduction

Investment Advisor

Rockbridge Investment Management, LLC is an investment advisor registered with the Securities and Exchange Commission. Brokerage and investment advisory services and fees differ, and it is important for a retail investor (defined as a natural person, or the legal representative of such natural person, who seeks to receive or receives services primarily for personal, family, or household purposes) to understand the differences. Free and simple tools are available to research firms and financial professionals on the SEC's investment education website at Investor.gov/CRS which provides educational materials about broker-dealers, investment advisors, and investing.

Item 2. Relationships and Services

What investment services and advice can you provide me?

Description of Services: We provide investment management services including, advice regarding asset allocation and the selection of investments, portfolio design, investment plan implementation and ongoing investment monitoring. We rely on the stated objectives of our clients and consider each client's risk profile and financial status prior to making any recommendations.

Investment supervisory services consist of constructing a portfolio for each client to achieve established risk objectives. The portfolio may include various funds, primarily passively managed, that would have the greatest probability of achieving the returns allowed by global capital markets at the lowest cost. The portfolio would be rebalanced on a regular basis to reflect previously established commitments to each market/asset class.

We also provide financial planning and consulting services. We start the comprehensive financial planning process by taking a financial inventory. This generally involves gathering enough data to perform an analysis of client liabilities, cash flow and net worth analysis, and tax assessments.

Our next step typically involves assisting clients with formalizing their goals and plotting their investment timelines.

We provide tax preparation services and also provide general non-securities advice on topics that may include tax and budgetary planning, estate planning and business planning.

Monitoring: We review client accounts no less than quarterly. Accounts are rebalanced to reflect previously established long-term commitments to various asset classes. Reviews may also be triggered by changes in a client's personal or financial status. There are no material limitations on our monitoring services.

Investment Authority: We provide investment management services to our clients on a discretionary and non-discretionary basis. When we manage client assets on a discretionary basis, we execute securities transactions for clients without having to obtain specific client consent prior to each transaction. Discretionary authority is limited to investments within clients' managed accounts. When we manage client assets on a non-discretionary basis, we notify clients and obtain specific client consent prior to each transaction.

Limited Investment Offerings: We do not offer any proprietary investment products.

Conversation Starters

| | |
|--|--|
| <i>Given my financial situation, should I choose an investment advisory service? Why or why not?</i> | <i>How will you choose investments to recommend to me?</i> |
|--|--|

What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?

Item 3. Fees, Costs, Conflicts, and Standard of Conduct

What fees will I pay?

Description of Principal Fees and Costs

We charge the following fees:

| <u>Assets Under Management</u> | <u>Annual Rate (%)</u> |
|--------------------------------|------------------------|
| \$0 to \$250,000 | 1.00%* |
| \$250,001 to \$1,000,000 + | 0.80% |
| Next \$4,000,000 | 0.60% |
| Next \$5,000,000 | 0.40% |
| Over \$10,000,000 | 0.20% |

*Accounts under \$250,000 subject to an additional \$40 annual fee

Financial Planning, Consulting and Tax Preparation Fees:

We offer financial planning and consulting services at a fixed rate of \$2,500 to \$10,000 based on the complexity of the financial plan or project and the range of services provided. Clients are quoted a fee for services prior to engagement and financial plans are typically delivered within two weeks. Tax preparation service fees range from \$0/year to \$10,000/year.

Conflicts of Interest: When we offer multiple services, there is an incentive to recommend other services offered by us, our employees, or associates because we may receive additional fees. The more assets that you have in your advisory account, the more you will pay in fees, creating an incentive for us to encourage you to increase the amount of assets in your accounts.

Description of Other Fees and Costs: Client accounts may incur additional fees and charges, such as transaction costs, retirement plan administration fees, and other mutual fund annual expenses that are charged by broker-dealers, plan administrators or mutual fund companies. These fees are in addition to and separate from advisory fees.

Additional Information: You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time.

Additional information concerning our fees and costs, how the fees are calculated and our conflicts of interest, can be found at

https://files.adviserinfo.sec.gov/IAPD/Content/Common/crd_iapd_Brochure.aspx?BRCHR_VRSN_ID=628845

Conversation Starters

What are your legal obligations to me when acting as my investment advisor? How else does your firm make money and what conflicts of interest do you have?

How might your conflicts of interest affect me, and how will you address them?

When we act as your investment advisor, we have to act in your best interest and not put our interests ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice, we provide you. Here are some examples to help you understand what this means:

We do not accept commissions or similar compensation or incentives from third parties, nor do we sell products. You pay a clearly disclosed fee for services which minimizes any conflicts of interest.

A conflict of interest is created whenever we or one of our associated persons recommend products or services to you for which we receive compensation.

How do your financial professionals make money?

We are a fee-only investment advisor whose sole source of revenue is advisory fees paid by clients on assets managed in their accounts, and fees explicitly charged for financial planning and consulting services.

Financial professionals are investment advisor representatives and receive a portion of fees generated by the client relationships being serviced including the amount of client assets, the time and complexity required to meet a client's needs and by providing tax preparation services.

Conversation Starter

Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?

Item 4. Disciplinary History

Conversation Starter

As a financial professional, do you have any disciplinary history? For what type of conduct?

Do you or your financial professionals have a legal or disciplinary history? **No**

Use the following link for information regarding investment advisor representatives:

<https://www.adviserinfo.sec.gov/IAPD/Default.aspx>

Item 5. Additional Information

Conversation Starters

Who is my primary contact person?

Is he or she a representative of an investment advisor or a broker-dealer?

Who can I talk to if I have concerns about how this person is treating me?

A retail client can find additional information about our services and receive a copy of this relationship summary by visiting our website at <http://www.rockbridgeinvest.com> or contacting us at (315) 671-0588.