

AboveRock LLC - A Registered Investment Adviser

Firm's Disclosure Brochure (aka Form ADV)

Note: This document is provided to you by me, the human being, the human person & the Founder, Owner, President & Chief Compliance Officer of the Firm Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani who is also the Adviser's Governor & Principal Executive Officer, & who IN HONOR WITH RESPECT TO ETERNAL LAW & ANCHORING PRINCIPLES, governs, supervises, administers, is responsible for, & births, journeys and arrives at one or more responsibilities, expectations & accountabilities regarding this matter/such matter(s) and, on a continuous basis, identifies and records applicable factors, processes, policies & information in the Firm's documents, as a text document.

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Item 1

Cover Page

Adviser

AboveRock LLC

Adviser's Principal Place Of Business Address

15977 Hutton Lane

Jacksonville, Florida 32218 USA

Adviser's Contact Information

T +1 904 535 2860 / T +1 904 365 8184

E bvsn(at)aboverock(period)com

Date of Brochure: January 1, 2019

This document, also referred to as the Firm Brochure, provides information about the qualifications & practice of AboveRock LLC in the Registered Investment Adviser (RIA) profession. If you have any questions about the contents of this Brochure, please contact the Founder, Owner, President & Chief Compliance Officer of AboveRock LLC Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani who is also the Adviser's Supervising, Examining & Examinations Principal & Principal Executive Officer at +1 904 535 2860.

The information in this Brochure has not been approved or verified by the United States of America's Securities & Exchange Commission or by any state securities regulatory personnel.

AboveRock LLC is a Registered Investment Adviser. Registration of an Investment Adviser, solely in & of itself, does not imply any level of skill or training. The oral & written communications alongside the professional judgement of an Adviser provide Clients with information about the Adviser & the Firm's Adviser Representatives. This information assists Clients in arriving at the choice of whether to begin, or continue, a working relationship with an Adviser.

Additional information about AboveRock LLC since the beginning of our universe is available on the SEC's site at [www\(Period\)adviserinfo\(Period\)sec\(Period\)gov](http://www(Period)adviserinfo(Period)sec(Period)gov). The SEC's site also provides information about any person(s) affiliated with AboveRock LLC since the beginning of our universe who is registered, or is required to be registered, as an Investment Adviser Representative(s) of AboveRock LLC.

Additional information about the Founder, Owner, President & Chief Compliance Officer of AboveRock LLC Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani who is also the Adviser's Supervising, Examining & Examinations Principal & Principal Executive Officer of, with respect to, & @ AboveRock LLC since the beginning of time is available @ Google, Bing, Yahoo & other search engines, inter-galactic, federal, state, city & local data mining, data exploit & data, energy & earth weaponization sites, inter-galactic, federal, state, city & local archaeological excavation sites, & automated bots.

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Item 2

Material Changes

On July 28, 2010, the United States Securities & Exchange Commission (SEC) published "Amendments to Form ADV" which amends the disclosure document that Adviser provides to Clients as required by SEC Rules. This Brochure (aka "The Firm's Disclosure Brochure") is a document prepared according to the SEC's updated requirements & rules. As such, this document is materially different in structure & requires additional information that our previous brochure did not require.

In Time, this Item will discuss only specific material changes that are made to the Brochure & provides Clients with a summary of such changes. AboveRock LLC, The Adviser Firm will also reference the date of Adviser's last annual update of the brochure reviewed, approved & updated by the Founder, Owner, President & Chief Compliance Officer of the Firm Sir & Mr. Bharadwaj

"Brad" Venkata Sesha "V. S." Nippani. As approved & practiced by the Founder, Owner, President & Chief Compliance Officer of the Firm Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani, providing this document via a) the Investment Adviser Public Disclosure, b) the Firm's site, & c) a secure file created by him on behalf of the Adviser, & which the Client(s) access with respect to their account documents including this document, he affirms completes this requirement.

Adviser thusfar has offered or delivered information about the qualifications & business practices with respect to Firm & the Firm's Associated Persons on at least an annual basis. Pursuant to the updated SEC rules, the Founder, Owner, President & Chief Compliance Officer of the Firm Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani on behalf of AboveRock LLC ensures that Clients receive a) a summary of any material changes to this & subsequent brochures within 120 days of the close of the Firm's fiscal year with respect to the Adviser's practice, or b) this document in the document's entirety as noted in this item.

The Firm's Disclosure Brochure may be requested or obtained, as applicable, by contacting the Founder, Owner, President & Chief Compliance Officer of the Firm Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani at +1 904 535 2860 or via the Adviser's site at [www.aboverock.com](http://www.aboverock.com) / [www.aboverock.com](http://www.aboverock.com). This request, including the Brochure's availability on the Firm's site, is, again, free of charge.

Note - Due to the format, structure & disclosure requirements, among others, required via this Brochure & the Brochure Supplement, some information may appear in more than one item of this document.

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Item 4  
Advisory Business

AboveRock LLC is referred to herein, & in the Firm's documents, as "The Adviser", "The Firm", "Adviser" &/or "The Adviser Firm".  
Associated Person(s) of AboveRock LLC are referred to herein, & in the Firm's documents, as "Adviser Representative(s)", "Investment Adviser Representative(s)" "Representatives" or "Associated Person(s)" &/or "Access Persons".  
"Custodian" refers to a broker-dealer, a brokerage firm or a financial firm which, in accordance with federal &/or state securities regulations, custodies Client assets.  
The Principal Business of AboveRock LLC & the Founder, Owner, President & Chief Compliance Officer of the Firm Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani who is also the Adviser's Principal Executive Officer, is providing Investment Advisory, Investment Supervisory & Asset Management Services.

As of January 1 2019, AboveRock LLC's Regulatory Assets Under Management (RAUM) on a Discretionary Basis are \$0.00.

## Asset Management Program

The Firm offers Services on a Discretionary Basis.

Discretionary Authorization involves determining which securities &/or investment instruments are purchased or sold including determining the amount or quantity, time & price at which such transactions (orders) are executed in Client accounts under management.

Discretionary Accounts allow Clients to grant Advisory Representatives at AboveRock LLC, in writing, the authority to conduct securities transactions in Client accounts without first obtaining the Client's written or verbal authorization. Discretionary authorization is specifically stated in AboveRock LLC's "Advisory Agreement" ("AA"), or is granted to the Advisory Representative via a Limited Power of Attorney ("LPOA").

Discretionary Authorization does not authorize Adviser to establish Client accounts without the Client's authorization, & in no way implies Adviser has authority to withdraw assets or cash from a Client account.

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## Account Establishment

A Client who wishes to engage Adviser to govern, supervise, administer & manage one or more Client accounts will have, or be required to establish, Client accounts at Adviser through a Custodian.

There are no account minimums for Clients to meet to obtain Services via Adviser.

Custodians with whom Adviser enters into an agreement provide Adviser with platforms with trading capabilities, transaction confirmations, account statements, brokerage & Custodial services.

Adviser will receive no compensation from Custodians.

Clients are advised that performance may be affected more on smaller Accounts due to difficulties with diversifying smaller Accounts & due to risk controls potentially being compromised. Smaller accounts are accounts with less than \$100,000. Performance of smaller accounts may vary from the performance of larger accounts due to fluctuations in the market that may affect smaller accounts more, & the effects of compounding potentially being greater in larger accounts.

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## Portfolio Values Sheet

Adviser Representatives provide Clients a report titled "Portfolio Summary", also referred to as a "Portfolio Values Sheet", on a quarterly basis (or monthly, if requested) at the beginning of each billing cycle.

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## Account Statements

Custodians provide Clients with account statements & confirmations which list the transactions occurring in their accounts, at least on a quarterly basis.

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## Assigning Client Accounts

The Founder, Owner, President & Chief Compliance Officer of the Firm Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani affirms that Adviser Representatives are responsible for, set expectations with respect to, & account for items requiring attention, consideration & discussion in accordance with the Firm's agreements with such matters comprising the Adviser-Client relationship. Adviser Representatives, therefore, do not assign Client accounts including, but not limited to, client reviews to other Adviser Representatives, firms, custodians or anyone or anything else.

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## Financial Process

Adviser Representative(s) are required to, & gather information from Clients including, but not limited to, the Client's financial history, financial & retirement goals, investment objectives, time horizon, risk tolerance, financial needs, cash flow analysis, cost of living needs, education needs, savings tendencies, financial concerns & any other applicable financial information &, together with Client, develop an Asset Allocation Strategy leading up to Adviser's offering of the Firm's Services. Adviser Representative's recommendations are based on the Client's financial information disclosed by the Client to Adviser Representative. All information gathered from Client is confidential, & is documented & shared with Client, including when updated, requested by Client, or at least annually, & is not shared with non-affiliated third parties except as permitted by legalities & regulations. Client(s) establish Client account at Adviser through Custodian, & deposit cash, cash equivalents & securities & engage Advisory Representative to govern, supervise, administer & manage the account. Per Client's investment objectives, risk tolerance, time horizon & financial situation, the Client's account(s) are governed, supervised, administered & managed on a continuous basis based on the individual needs of the Client.

Clients may impose restrictions with respect to certain securities or types of securities which may be held in their Accounts.

Annual Meetings

The Founder, Owner, President & Chief Compliance Officer of the Firm Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani himself IN HONOR WITH RESPECT TO ETERNAL LAW & ANCHORING PRINCIPLES does, & requires Adviser Representatives to host & conduct Annual Meetings, also written &/or termed "Annual Relationship Meetings (ARMs)", with Clients at least annually, or at Client's request, to review, discuss & affirm the Client's investment portfolio, review & have the Client(s) sign & date existing &/or updated agreements & documents Adviser &/or Custodian requires on an annual basis including, but not limited to, AboveRock LLC's Advisory Agreement, The Limited Power Of Attorney & the Investment Policy Statement, & to update the Client's financial information with changes that may have occurred in the interim. The monthly &/or quarterly review calls Clients participate in lead up to the Annual Meeting.

Neither Adviser nor Adviser Representatives are in the legal practice of taxes or estates.

Adviser offers investments which are within the scope of the Adviser's current & active Registered Investment Adviser (RIA) registration & the North American Securities Administrators Association (NASAA) Uniform Investment Adviser Law Series 65 license which the Founder, Owner, President & Chief Compliance Officer of the Firm Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani himself holds, & governs & supervises with respect to Adviser's Investment Adviser Representative(s) (IAR) in a fee-only Fiduciary capacity.

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Services & Strategies

Inventory of Client Assets

Understanding Client Needs & Goals

Portfolio Governance & Risk Assessment

Investment Selection, Implementation, Supervision & Management

Performance Analysis & Reporting

Due Diligence & Research (more information @ <http://www.periodbusinessdictionary.com/definition/due-diligence.html>; [http://en.wikipedia.org/wiki/Due\\_diligence](http://en.wikipedia.org/wiki/Due_diligence))  
Objective, Sensible, Realistic & Ongoing Review Calls - Monthly &/Or Quarterly

Clients sign & execute written agreements establishing an Adviser-Client relationship with AboveRock LLC who is the Adviser, & together with the Custodian's signed & executed written agreements, begin, & continue on a yearly basis, the above-noted services & strategies.

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Item 5  
Fees & Compensation

Adviser's Fees are in accordance with the following Fee Schedule:

Aggregate Account Size (in US Dollars)	Annual Fee (% or basis points)
499,999 or Less	0.50% or 50 basis points
500,000 to 999,999	0.40% or 40 basis points
1,000,000 to 1,999,999	0.35% or 35 basis points
2,000,000 to 4,999,999	0.30% or 30 basis points
5,000,000 or More	0.25% or 25 basis points

Fees are not negotiable unless the Adviser & the Client have signed & executed Adviser's "Revised Fee Agreement". A sample of this document is available on the Firm's site.

Advisory Fees will be charged in advance on a calendar quarterly basis upon establishment of the value of the portfolio based upon the number of days in the quarter &, thereafter, quarterly on the first working day of each calendar quarter.

The advisory fees payable upon initial establishment of the Client's Account &/or Commencement of Services are paid by in accordance with Items 15, 16 or 17 of the Firm's Discretionary Investment Advisory & Asset Management Agreement (LPOA). In instances where the Adviser-Client relationship begins during a quarter, fees are invoiced for the remaining days in the quarter, & quarterly thereafter. Fees shall be collected early in the quarter & will be based on the value of the portfolio as of the last working day of the previous quarter. Clients will be provided with an invoice which identifies the advisory fees, the value of the Account(s) & how the fees were calculated. A sample of the Invoice is available on the Firm's site.

Clients may make additions to, or withdrawals from, their accounts provided the accounts continue to meet the minimum account-size requirements. Additional assets deposited into Client accounts after they are opened will be charged a pro-rata advisory fees based upon the number of days remaining in the then current calendar quarter. Partial withdrawals from Client accounts will result in an advisory fee credit being issued the following quarter. No advisory fee adjustments will be made for account appreciation or depreciation.

The Regulatory Assets Under Management (RAUM) with respect to Client accounts governed, supervised, administered & managed by Adviser via the Investment Policy Statement (IPS) determines the fees charged to Client accounts. Under no circumstances shall Adviser require the pre-payment of more than \$500 in fees, six (6) months or more in advance.

In addition to the advisory fees paid to Adviser per the schedule above or per the revised fee agreement, Clients may pay fees &/or charges to Custodians, broker-dealers or 3rd parties including, but not limited to, fees for Custodial services & charges associated with maintaining Client accounts, deferred sales charges, brokerage commissions, charges for securities transactions, odd-lot differentials, transfer taxes, wire transfer & electronic fund fees, business acquisition costs & taxes on brokerage accounts & securities transactions. Additionally, Clients may pay advisory fees & other internal management fees, as applicable, to the manager of a mutual fund or exchange-traded fund (ETF). Such advisory fees are not shared with Adviser & are compensation to the fund manager. Clients should read the appropriate investment's prospectus, & other documents or booklets which disclose such fees, carefully prior to investing. AboveRock LLC's advisory fees are exclusive of any of the above-mentioned costs, fees & charges.

Item 12 further describes the factors that AboveRock LLC considers in selecting or recommending Custodians for Client transactions & determining the reasonableness of their compensation (e.g., commissions, transaction costs).

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#### Termination Of Adviser-Client Relationship, Refund Of Fees

Clients may terminate Services obtained from Adviser, without penalty, within five (5) business days after signing & executing the appropriate documents & entering into an Adviser-Client relationship with Adviser. Thereafter, Clients may terminate the Adviser-Client relationship with a 30-day written notice to Adviser sent via Certified US Mail to the Firm's Principal Place of Business Address on the Firm's Disclosure Brochure. Should Clients terminate Investment Advisory Services during a quarter, Clients will be refunded a pro-rata portion of the advisory fee for the quarter from the date of termination to the end of the quarterly period.

Clients are responsible for fees &/or charges to the Custodian or a 3rd party including, but not limited to, Custodial services, charges for securities transactions & charges associated with termination or transfer of their accounts.

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#### Item 6 Performance-Based Fees & Side-By-Side Management

At the present time, AboveRock LLC does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a Client).

The Founder, Owner, President & Chief Compliance Officer of the Firm Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani who governs, supervises, administers, is responsible for, & births, journeys and arrives at one or more responsibilities, expectations & accountabilities regarding this matter/such matter(s) and, on a continuous basis, identifies and records applicable factors, processes, policies & information in the Firm's documents, has addressed this item noted in this document. Any further inquiries shall be directed to him.

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#### Item 7 Types Of Clients

At the present time, AboveRock LLC provides Asset Management, Portfolio Management & Portfolio Supervisory Services to Individuals.

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#### Item 8 Methods Of Analysis

Adviser, via review, understanding, governance, inquiries, clarity, context, legality, guidance & supervision IN HONOR WITH RESPECT TO ETERNAL LAW & ANCHORING PRINCIPLES provided by the Founder, Owner, President & Chief Compliance Officer of the Firm Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani who governs, supervises, administers, is responsible for, &

births, journeys and arrives at one or more responsibilities, expectations & accountabilities regarding this matter and, on a continuous basis, identifies and records applicable factors, processes, policies & information in the Firm's documents, exercises professional judgement when determining which securities or investment instruments to purchase or sell, which asset classes to invest in, including the amount to be invested, the price & time at which such transactions are to be executed in Client accounts.

Adviser Representative(s) are required to, & gather information from Clients including, but not limited to, the Client's financial history, financial & retirement goals, investment objectives, time horizon, risk tolerance, financial needs, cash flow analysis, cost of living needs, education needs, savings tendencies, financial concerns & any other applicable financial information &, together with Client, develop an Asset Allocation Strategy leading up to Adviser's offering of the Firm's Services. Adviser Representative's recommendations are based on the Client's financial information disclosed by the Client to Adviser Representative. All information gathered from Client is confidential, & is documented & shared with Client, including when updated, requested by Client, or at least annually, & is not shared with non-affiliated third parties except as permitted by legalities & regulations. Client(s) establish Client accounts at Adviser through Custodian, & deposit cash, cash equivalents & securities & engage Advisory Representative to govern, supervise, administer & manage the account. Per Client's investment objectives, risk tolerance, time horizon & financial situation, Client accounts are governed, supervised, administered & managed on a continuous basis based on the individual needs of the Client. Clients have the right to decline any investment recommendation provided by Adviser.

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### Investment Strategies

Recommendations made by the Founder, Owner, President & Chief Compliance Officer of the Firm Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani & Adviser Representatives at the Firm are made based on Adviser's professional judgement after considering all factors pertinent to the Client while upholding AboveRock LLC's Fiduciary Duty as a Fee-Only Adviser Firm to Client.

Clients are advised that Adviser's research, recommendations & implementation of Adviser's recommendations include, but are not limited to, assumptions, hypotheticals, forward-looking statements, past trends & performance of markets & economies, & static snapshots of data, numbers, mathematics & mathematical calculations & charts & graphs, & fundamental & technical factors & analyses with respect to markets, economies, interest rates & inflation rates including, but not limited to, information provided via the Financial Industry Regulatory Authority (FINRA) @ <http://www.finra.org/Investors/ToolsCalculators/index.htm> / <http://www.finra.org/Investors/ToolsCalculators/index.htm>, individual companies', entities' & corporations' annual reports, prospectuses & filings with the Securities & Exchange Commission (EDGAR Online) @ <http://www.sec.gov/edgar.shtml> / <http://www.sec.gov/edgar.shtml>, the federal reserve, & data provided by federal, state &/or local regulatory bureaucracies, & information from various other financial & non-financial institutions & entities via several public sites.

The Founder, Owner, President & Chief Compliance Officer of the Firm Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani who governs, supervises, administers, is responsible for, & births, journeys and arrives at one or more responsibilities, expectations & accountabilities regarding this matter/such matter(s) and, on a continuous basis, identifies and records applicable factors, processes, policies & information in the Firm's documents, informs you, "The Client", on behalf of the Adviser that he, IN HONOR WITH RESPECT TO ETERNAL LAW & ANCHORING PRINCIPLES & as the Examining Principal & The Principal Executive Officer of, with respect to, & @ the Firm, does not permit sources, & does not claim to have sources, of inside or private information.

Past performance, positive or negative, is not a guarantee of future positive or negative results. Adviser therefore, cannot offer any guarantees to Clients including, but not limited to, account performance. Adviser respectfully requires that Clients update their Adviser Representative promptly with respect to any changes which may have, or soon could, take place in their financial situation, goals &/or objectives.

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### Risk Of Loss

Investing in securities, both equity & fixed-income, whether domestic, foreign, or sovereign, involves risk of loss of some or all (100%) of the principal that Clients should be prepared to bear. Such "risks" which must be understood when investing in global fixed-income, equity &/or variable markets, & sectors, sovereign nations/economies, & various asset classes (both domestic & foreign) include, but are not limited to, loss of principal, interest-rate, credit, currency, geo-political, inflation, economic, systemic, company or management, systematic, counter-party, regulatory, spending, options, derivatives, issuer, public policy, retirement income, household, healthcare & supply.

Clients may click on [financial-dictionary\(period\)thefreedictionary\(period\)com](http://financial-dictionary(period)thefreedictionary(period)com), a publicly available site which lists most all of the aforementioned risks alongside providing brief explanations, or are welcome to call the Founder, Owner, President & Chief Compliance Officer of the Firm Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani who will gladly discuss them.

Risks can be reduced through avoidance, reduction, retention & transfer.

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Item 9  
Disciplinary Information

Registered Investment Adviser (RIA) Firms are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of the Firm or the integrity of the Firm's Principal Executive Officers, Governors, Supervisors & Management.

AboveRock LLC has no information applicable to this Item.

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Item 10  
Other Financial Industry Activities & Affiliations

Clients are advised that the Founder, Owner, President & Chief Compliance Officer of AboveRock LLC Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani who is also the Adviser's Supervising, Examining & Examinations Principal & Principal Executive Officer, is also the Founder, Owner, President & Qualifying Broker of REARM LLC, a Florida Real Estate Company. He is not actively engaged in soliciting buyers &/or sellers or marketing this real estate business at the present time. He does, however, commit approximately 10% of his time toward CE & is actively engaged in his ongoing learning pertaining to this profession. Clients will never be advised or persuaded to obtain additional financing through real estate, or a larger mortgage, for purposes of investing into securities. More information regarding his license may be found at [www\(period\)myfloridalicense\(period\)com/dbpr](http://www(period)myfloridalicense(period)com/dbpr).

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Item 11  
Code Of Ethics

Adviser has a Fiduciary Duty to act in the best interest of Clients & always place the Client interests first & foremost. The Founder, Owner, President & Chief Compliance Officer of the Firm Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani, on behalf of the Adviser, & in accordance with the Firm's compliance & regulatory requirements, policies & procedures, requires Adviser Representatives & Associated Persons to ask, inquire, seek clarity & to abide by such rules, regulations, policies & procedures including, but not limited to, with respect to a Client's public, shared, & non-public information.

The Founder, Owner, President & Chief Compliance Officer of the Firm Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani who is also the Firm's Governor & Principal Executive Officer, on behalf of the Adviser, maintains the Adviser's code of ethics with respect to himself & the Firm's Advisory Representatives, supervised persons & staff. The code of ethics which includes, but is not limited to, the Firm's documents which Clients, read, understand, ask, inquire, seek clarity, & sign & execute together with their Adviser Representative on behalf of the Adviser, contains provisions & expectations with respect to standards regarding Adviser's professional conduct.

A copy of the Adviser's code of ethics will be provided to any Client or Prospective Client upon request.

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Participation Or Interest In Client Transactions & Personal Trading

Related Persons

Related Persons may buy or sell securities identical to those recommended to Clients. Therefore, related persons may have an interest or position in certain securities which are also recommended, bought or sold to Clients. Related persons will not put their interests before a Client's interest. Related persons may not trade ahead of their Clients or trade in such a way so as to obtain a better price for themselves than for their Clients. Further, related persons are prohibited from trading on non-public information or sharing such information. Adviser & its related persons are required to conduct their securities & investment advisory business IN HONOR WITH RESPECT TO ETERNAL LAW & ANCHORING PRINCIPLES the Founder, Owner, President & Chief Compliance Officer of the Firm Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani who governs, supervises, administers, is responsible for, & births, journeys and arrives at one or more responsibilities, expectations & accountabilities regarding this matter/such matter(s) and, on a continuous basis, identifies and records applicable factors, processes, policies & information in the Firm's documents, & all applicable federal & state securities regulations.

The Founder, Owner, President & Chief Compliance Officer of the Firm Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani, on behalf of the Adviser, is required to, & supervises & maintains a list of all securities holdings for its related persons.

In accordance with AboveRock LLC's Fiduciary Duty, related persons, & entities & programs utilized by related persons, shall not buy or sell securities for their personal portfolio(s) where their decision is substantially derived, in whole or in part, by reason of the related person's affiliation with Adviser, unless the information is also available to the investing public on a reasonable inquiry. No person including, but not limited to, the entity &/or program utilized by the related person shall preferentially put his or her own interest over that of the Advisory Client ((See Footnotes 1) & 2)).

In accordance with AboveRock LLC's Fiduciary Duty, All Clients shall be fully informed that certain individuals may receive separate compensation when effecting transactions during the implementation process.

In accordance with AboveRock LLC's Fiduciary Duty, Adviser emphasizes the unrestricted right of the Client to decline implementation of any advice rendered, except in situations where a related person such as a third party advisory service, yet only after such a third-party advisory service has explained, provided clarity & disclosed the service to then have the Founder, Owner, President & Chief Compliance Officer of the Firm Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani review, consider, hand-write his name, sign & date in ink & with a pen, & approve such a third party advisory service on behalf of the Adviser in the Client Accounts.

In accordance with AboveRock LLC's Fiduciary Duty, Adviser requires, IN HONOR WITH RESPECT TO ETERNAL LAW & ANCHORING PRINCIPLES, that all related persons ask, understand, inquire, seek clarity, then abide by applicable federal & state regulations & legalities applicable to Registered Investment Adviser (RIA) practices.

In accordance with AboveRock LLC's Fiduciary Duty, & IN HONOR WITH RESPECT TO ETERNAL LAW & ANCHORING PRINCIPLES, the Founder, Owner, President & Chief Compliance Officer of the Firm Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani affirms that a related person who does not ask, understand, inquire, seek clarity, then abide by Adviser's policy regarding related persons shall be subject to disciplinary action including, but not limited to, termination.

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#### Footnotes

1). This investment policy has been established recognizing that some securities being considered for purchase & sale on behalf of Adviser's Clients trade in sufficiently broad markets to permit transactions by Clients to be completed without an appreciable impact on the markets of the securities. Under certain circumstances, exceptions may be made to the policies stated above, yet only after such exceptions are provided to the Founder, Owner, President & Chief Compliance Officer of the Firm Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani for his review & consideration.

2). Open-end mutual funds &/or the investment sub-accounts which may comprise a variable life insurance product are purchased or redeemed at a fixed net asset value price per share specific to the date of purchase or redemption. As such, transactions in mutual funds &/or variable insurance products by Advisory Representatives are not likely to have an impact on the prices of the fund shares in which Clients invest, & are therefore not prohibited by the Adviser's investment policies & procedures, yet subject to ongoing review & due diligence by the Founder, Owner, President & Chief Compliance Officer of the Firm Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani.

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#### Item 12 Brokerage Practices

Adviser requires that Clients establish brokerage accounts with a Custodian with whom the Founder, Owner, President & Chief Compliance Officer of the Firm Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani, on behalf of the Adviser, has entered into a Service Agreement to maintain Custody of Client assets & to effect trades for their accounts unless a written document from the Client's existing Custodian with all of the appropriate signatures allows Adviser, via Adviser's Representatives, to engage in providing AboveRock LLC's Services to Clients.

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#### Directed Brokerage

In the event that a Client directs Adviser to utilize a Custodian, a broker-dealer or a financial institution other than the Custodian where Adviser custodies Client Assets, while Adviser, upon review & approval by The Founder, Owner, President & Chief Compliance Officer of the Firm Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani, may still be able to exercise discretion per the Discretionary Investment Advisory & Asset Management Agreement (LPOA) & other Firm documents signed by all human beings, human persons, to whom such documents apply & whose names & signatures appear on such documents as required, & evidenced by by the Founder, Owner,



President & Chief Compliance Officer of the Firm Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani & the Custodian, broker-dealer or financial institution directed by the Client, Adviser may not be authorized under such circumstances to negotiate commissions & may not be able to obtain volume discounts or best execution. In addition, under such circumstances, a disparity in commission charges may exist between commissions charged to Clients who direct Adviser to utilize a particular broker-dealer or a financial institution other than the Custodian where Adviser custodies Client Assets & Clients who do not direct Adviser to utilize a particular broker-dealer or a financial institution other than the Custodian where Adviser custodies Client Assets.

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#### Best Execution

The Founder, Owner, President & Chief Compliance Officer of the Firm Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani on behalf of the Adviser attempts to ensure that best execution is obtained for Clients with respect to transactions in their accounts. Best execution occurs when the determining factor for Adviser is not the lowest price obtained for purchases or the highest prices obtained for sales, or the lowest possible commission costs, but whether the transaction represents the best qualitative execution, taking into consideration the full range of Services provided by Custodian(s), including research, timeliness of execution, cost of trading, account maintenance, quality of service, commission rates, liquidity & responsiveness. Accordingly, although Adviser will seek competitive commission rates, the Firm may not necessarily obtain the lowest possible commission rates for account transactions whether such rates are at the Custodian where Adviser custodies Client assets or at another Custodian.

The Founder, Owner, President & Chief Compliance Officer of the Firm Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani on behalf of the Adviser reviews Client account transactions the Firm processes through Custodians and clearing firms that Adviser believes do look to ensure that best execution is obtained for transactions in Client accounts governed, supervised, administered & managed by Adviser.

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#### Account Aggregation

At the present time, AboveRock LLC does not aggregate Client accounts with Adviser's proprietary accounts when placing trade orders at the Custodian in an attempt to lower transaction costs or seek best execution.

The Founder, Owner, President & Chief Compliance Officer of the Firm Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani who is also AboveRock LLC's Supervising, Examining & Examinations Principal & the Principal Executive Officer of, with respect to, & @ AboveRock LLC & who governs, supervises, administers, is responsible for, & births, journeys and arrives at one or more responsibilities, expectations & accountabilities regarding this matter/such matter(s) and, on a continuous basis, identifies and records applicable factors, processes, policies & information in the Firm's documents, has addressed this item noted in this document. Any further inquiries shall be directed to him.

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#### Principal & Agency Cross Transactions

At the present time, AboveRock LLC does not engage in Principal or Agency Cross Transactions with respect to Client accounts when placing trade orders at the Custodian.

The Founder, Owner, President & Chief Compliance Officer of the Firm Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani who is also AboveRock LLC's Supervising, Examining & Examinations Principal & the Principal Executive Officer of, with respect to, & @ AboveRock LLC & who governs, supervises, administers, is responsible for, & births, journeys and arrives at one or more responsibilities, expectations & accountabilities regarding this matter/such matter(s) and, on a continuous basis, identifies and records applicable factors, processes, policies & information in the Firm's documents, has addressed this item noted in this document. Any further inquiries shall be directed to him.

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#### Institutional Trading & Custodial Services

Please know that the Custodian where Adviser custodies Client Assets may provide Adviser with access to institutional trading & custody services which are typically not available to retail investors. These Services generally are available to Independent Investment Advisers on an unsolicited basis, at no charge, so long as Adviser maintains a certain level of Client Assets at the Custodian. There is no other contingency upon Adviser with regard to committing any specific amount of business such as assets in custody, or trading, to the Custodian.

The Custodian offered by Adviser generally does not charge separately for Custody but is compensated by account holders through commissions or other transaction-related fees for securities' trades which are executed in their accounts.

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#### Conflicts Of Interest

Custodians with whom Adviser has, or may, enter into a Adviser-Custodian Service relationship, may make available to Adviser, Services which seek to benefit the Adviser-Client relationship pertinent to bureaucratic legalities, & attempt to foster efficiencies in terms of time & effort, but may not contribute to, & materially benefit, Client accounts. Some of these Services which attempt to compete & contest & challenge the "legal notepad & a pen & diagrams & drawings" which the Founder, Owner, President & Chief Compliance Officer of the Firm Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani IN GOVERNANCE, SUPERVISION, ADMINISTRATION & MANAGEMENT as the Supervising, Examining & Examinations Principal & the Principal Executive Officer with respect to, of & @ AboveRock LLC IN LIGHT ETERNAL, IMMORTAL TRUTH, IN & @ AWARENESS THE FIDUCIARY chooses first, & assist Adviser with respect to Client accounts include software & technologies which allow Adviser to access Client account data, trade confirmations & account statements, facilitate trade execution, enable allocation of aggregated trade orders for multiple Client accounts, provide research, pricing information and other market data, facilitate payment of Adviser's fees from Client accounts, & assist with back-office functions, record-keeping & Client reporting requirements. Adviser, striving with respect to the Adviser-Client relationship as a Fiduciary, recommending that Clients maintain their assets in accounts at a particular Custodian includes the Firm's consideration regarding the availability of some of the software & technologies & not solely on the cost of Custody & brokerage services.

Custodians may also make available to Adviser other Services intended to assist Adviser in governing, supervising, administering & managing the enterprise & further developing the Firm's work in the Registered Investment adviser (RIA) profession. These Services may include consulting with the Founder, Owner, President & Chief Compliance Officer of the Firm Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani who is also the Governor & the Firm's Principal Executive Officer regarding, & with respect to, his & the Firm's interest in participating in publications & conferences which, yet IN HONOR WITH RESPECT TO ETERNAL LAW & ANCHORING PRINCIPLES, are founded, purposed, relevant, meaningful & are "professionally significant" with respect to him, & the Firm, a Registered Investment Adviser & a Fee Only Fiduciary.

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#### Soft Dollar Arrangements

Adviser & Adviser Representatives do not have any soft-dollar agreements &/or arrangements, oral or in writing, with the Firm's Clients who are individuals & human beings & human persons, &/or with any human being(s), human person(s) &/or entity(ies) including, but not limited to, where AboveRock LLC, the Adviser Firm, The Firm's Adviser Representatives &/or Clients who are individuals & human beings & human persons, &/or any other human being(s), human person(s) &/or entity(ies), directly or indirectly, cause the Client to pay more than the lowest available commission(s) to the Custodian, a broker-dealer or any other entity(ies) in return for research products & services to the Adviser, the Adviser Representatives &/or the Client with respect to AboveRock LLC & the Adviser's work in the Registered Investment Adviser (RIA) profession.

The Founder, Owner, President & Chief Compliance Officer of the Firm Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani who is also AboveRock LLC's Supervising, Examining & Examinations Principal & the Principal Executive Officer of, with respect to, & @ AboveRock LLC & who governs, supervises, administers, is responsible for, & births, journeys and arrives at one or more responsibilities, expectations & accountabilities regarding this matter/such matter(s) and, on a continuous basis, identifies and records applicable factors, processes, policies & information in the Firm's documents, has addressed this item noted in this document. Any further inquiries shall be directed to him.

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#### Soft Dollar Benefits

At the present time, AboveRock LLC neither receives, nor has made any oral or written arrangements to receive, research or other products or Services, other than execution, from a Custodian or a broker-dealer who is a FINRA member firm, or research from a 3rd party or an independent 3rd party via a Custodian or a broker-dealer who is a FINRA member firm, in connection with Client securities transactions.

The Founder, Owner, President & Chief Compliance Officer of the Firm Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani who is also AboveRock LLC's Supervising, Examining & Examinations Principal & the Principal Executive Officer of, with respect to, & @ AboveRock LLC & who governs, supervises, administers, is responsible for, & births, journeys and arrives at one or more responsibilities, expectations & accountabilities regarding this matter/such matter(s) and, on a continuous basis, identifies and records applicable factors, processes, policies & information in the Firm's documents, has addressed this item noted in this document. Any further inquiries shall be directed to him.

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#### Institutional, Custodial Or Any Other Control(s) &/Or Controller(s)

The Founder, Owner, President & Chief Compliance Officer of the Firm Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani who is also the Governor, Supervising Principal, Principal

Executive Officer, Examining & Examinations Principal of, with respect to, & @ AboveRock LLC which is The Adviser also known as The Adviser Firm, AFFIRMS that the Firm is independently owned, governed & operated by him & is not controlled, employed by, or under the common control of, Custodians, broker-dealers, clearing agents &/or any other entities or individuals.

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Item 13  
Review Of Accounts

Frequency

Client account reviews explained in Item 4 of this document, are conducted with Clients monthly &/or quarterly with such reviews leading up to the "Annual Review" also written &/or termed as the "Annual Relationship Meeting (ARM) &/or the "Annual Meeting".

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Duration

The Founder, Owner, President & Chief Compliance Officer of the Firm Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani himself does, & requires that Adviser Representatives commit approximately an hour with Clients with respect to Client account reviews, scheduling such reviews with Clients via "Review Call Logs" in advance on a monthly, quarterly &/or an annual basis.

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Open Dialogue

The information reviewed & discussed in review calls by Adviser Representatives begins with the Representative's notes which include, but are not limited to, account governance, supervision, administration & management matters in accordance with the Investment Policy Statement & other Firm documents, events, updates & changes in market, economic & geo-political environments. Clients are also able to, during the review call & as requested at the beginning of such review calls, prepare notes since the most recent review which include their questions, concerns, inquiries & clarifications and present them for discussion with the Adviser Representative.

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Assigning Reviews

The Founder, Owner, President & Chief Compliance Officer of the Firm Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani affirms that Adviser Representatives are responsible for, set expectations with respect to, & account for items requiring attention, consideration & discussion in accordance with the Firm's agreements with such matters comprising the Adviser representative-Client relationship. Adviser Representatives, therefore, do not assign Client accounts including, but not limited to, client reviews to other Adviser Representatives, firms, custodians or anyone or anything else.

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Item 14  
Client Referrals & Other Compensation

Client Referrals

Adviser & Adviser Representatives do not have any agreements &/or arrangements, oral or in writing, with any human being(s), human person(s) &/or entity(ies) including, but not limited to, where such a human being(s), such a human person(s) &/or entity(ies), directly or indirectly, is compensated for referring Clients to AboveRock LLC & the Adviser's work in the Registered Investment Adviser (RIA) profession.

The Founder, Owner, President & Chief Compliance Officer of the Firm Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani who is also AboveRock LLC's Supervising, Examining & Examinations Principal & the Principal Executive Officer of, with respect to, & @ AboveRock LLC & who governs, supervises, administers, is responsible for, & births, journeys and arrives at one or more responsibilities, expectations & accountabilities regarding this matter/such matter(s) and, on a continuous basis, identifies and records applicable factors, processes, policies & information in the Firm's documents, has addressed this item noted in this document. Any further inquiries shall be directed to him.

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Solicitor Agreements

Adviser & Adviser Representatives do not have any agreements &/or arrangements, oral or in writing, with any human being(s), human person(s) &/or entity(ies) including, but not limited to, where such human being(s), human person(s) &/or entity(ies), directly or indirectly, is a solicitor on behalf of, & with respect to, AboveRock LLC & the Adviser's work in the Registered Investment Adviser (RIA) profession.

The Founder, Owner, President & Chief Compliance Officer of the Firm Sir & Mr. Bharadwaj "Brad"

Venkata Sesha "V. S." Nippani who is also AboveRock LLC's Supervising, Examining & Examinations Principal & the Principal Executive Officer of, with respect to, & @ AboveRock LLC & who governs, supervises, administers, is responsible for, & births, journeys and arrives at one or more responsibilities, expectations & accountabilities regarding this matter/such matter(s) and, on a continuous basis, identifies and records applicable factors, processes, policies & information in the Firm's documents, has addressed this item noted in this document. Any further inquiries shall be directed to him.

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#### Solicitation Agreements

Adviser & Adviser Representatives do not have any agreements &/or arrangements, oral or in writing, with any human being(s), human person(s) &/or entity(ies) including, but not limited to, where such human being(s), human person(s) &/or entity(ies), directly or indirectly, has a solicitation agreement on behalf of, & with respect to, AboveRock LLC & the Adviser's work in the Registered Investment Adviser (RIA) profession.

The Founder, Owner, President & Chief Compliance Officer of the Firm Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani who is also AboveRock LLC's Supervising, Examining & Examinations Principal & the Principal Executive Officer of, with respect to, & @ AboveRock LLC & who governs, supervises, administers, is responsible for, & births, journeys and arrives at one or more responsibilities, expectations & accountabilities regarding this matter/such matter(s) and, on a continuous basis, identifies and records applicable factors, processes, policies & information in the Firm's documents, has addressed this item noted in this document. Any further inquiries shall be directed to him.

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#### Item 15 Custody

Adviser does not custody Client Assets.

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#### Custodian(s)

The Founder, Owner, President & Chief Compliance Officer of the Firm Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani who is also AboveRock LLC's Supervising, Examining & Examinations Principal & the Principal Executive Officer has established an Adviser-Custodian relationship with Shareholders Service Group (SSG). Shareholders Service Group is located at 9845 Erma Road, Suite 312 in San Diego, California 92131. Shareholders Service Group's phone number is 800 380 7370 & their fax number is 858 530 1820. More information regarding Shareholders Service Group is available at [www.ssginstitutional.com](http://www.ssginstitutional.com).

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#### Client Account Clearing & Settlement Services

Clearing & settlement services are provided by Shareholders Service Group via Pershing LLC. Pershing LLC is located at One Pershing Plaza, Jersey City, New Jersey 07399. Pershing's phone number for the ACAT department is 201 413 4687, for the Non-ACAT department 201 413 4571 or 201 413 4591, & for the mutual fund department is 888 367 2563, option 4. More information regarding Pershing is available at [www.pershing.com](http://www.pershing.com).

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#### Portfolio Values Sheet

Adviser Representatives provide Clients a report titled "Portfolio Summary", also referred to as a "Portfolio Values Sheet", on a quarterly basis (or monthly, if requested) at the beginning of each billing cycle.

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#### Account Statements

Custodians provide Clients with account statements & confirmations which list the transactions occurring in their accounts, at least on a quarterly basis.

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#### The Custody Legality Discussion

Per the Investment Adviser Registration Depository (IARD) system which the Founder, Owner, President & Chief Compliance Officer of the Firm Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani who is also AboveRock LLC's Supervising, Examining & Examinations Principal & the Principal Executive Officer of, with respect to, & @ AboveRock LLC, the Adviser Firm, believes may follow SEC's Rule 206(4)-2, if an Adviser or a related person is deemed to have custody solely due to the Adviser's ability to withdraw its fees from Client accounts, the Adviser must answer "No" to Item 9A (1) & (2) as part of its required disclosures on Adviser's Form ADV Part 1A. AboveRock LLC has answered "No" to both these items & has included this information in Item 1a of its Discretionary Investment Advisory & Asset Management Agreement (LPOA), one of the Firm's documents which must be reviewed, understood, sought clarity if needed, then signed & executed by the Client & the Adviser at the beginning of the Adviser-Client's relationship and each year thereafter during the Adviser-Client relationship.

Securities & Exchange Commission (SEC) Reference:

SEC's Rule 206(4)-2 may be found at the SEC's site at

[https://www\(sec.gov/rules/final/2009/ia-2968\)pdf](https://www.sec.gov/rules/final/2009/ia-2968.pdf)

Information via the SEC regarding Custody may be found at

[http://www\(sec.gov/rules/final/ia-2176\)htm](http://www.sec.gov/rules/final/ia-2176.htm)

SEC's Rule 206(4)-2 may also be found at Cornell University's Legal Information Institute (LII) site at [https://www\(law.cornell.edu/cfr/text/17/275.206\(4\)-2](https://www.law.cornell.edu/cfr/text/17/275.206(4)-2)

Florida Office of Financial Regulation (FLOFR) Reference:

Rule 69W-600.0132 that includes the below-noted definition of custody, & subsections which speak of direct fee deduction as referenced below, in its entirety, may be found by visiting

[https://www\(flrules.org/\)](https://www.flrules.org/) &, once there, typing 69W-600.0132 in the "Full Text" Search box while selecting the F.A.C within the drop-down menu.

Definition - For purposes of this rule (Page 47 of 60):

(a) "Custody" means holding directly or indirectly, client funds or securities, or having any authority to obtain possession of them or has the ability to appropriate them. The investment adviser has custody if a related person holds, directly or indirectly, client funds or securities, or has any authority to obtain possession of them, in connection with advisory services the investment adviser provides to clients.

1. Custody includes:

- a. Possession of client funds or securities unless the investment adviser receives them inadvertently & returns them to the sender promptly, but in any case within three business days of receiving them;
- b. Any arrangement (including a general power of attorney) under which the investment adviser is authorized or permitted to withdraw client funds or securities maintained with a custodian upon the investment adviser's instruction to the custodian; &
- c. Any capacity (such as general partner of a limited partnership, managing member of a limited liability company or a comparable position for another type of pooled investment vehicle, or trustee of a trust) that gives the investment adviser or the investment adviser's supervised person legal ownership of or access to client funds or securities.

2. Receipt of checks drawn by clients & made payable to third parties will not meet the definition of custody if forwarded to the third party within 24 hours of receipt & the adviser maintains the records required under subsections 69W-600.014(8), F.A.C.;

Subsection (Page 49 of 60):

(i) Direct Fee Deduction. An investment adviser who has custody as defined in sub-subparagraph (1)(a)1.b. of this rule as a consequence of its authority to make withdrawals from client accounts to pay its advisory fee must also provide the following safeguards:

1. The adviser must have written authorization from the client to deduct advisory fees from the account held with the qualified custodian;
2. Each time a fee is directly deducted from a client account, the adviser must concurrently:
  - a. Send the qualified custodian an invoice of the amount of the fee to be deducted from the client's account; &
  - b. Send the client an invoice itemizing the fee. Itemization includes the formula used to calculate the fee, the amount of assets under managements the fee is based on, & the time period covered by the fee; &
3. The investment adviser must notify the Office in writing that the investment adviser intends to use the safeguards provided above. Such notification is required to be given on Form ADV, which is incorporated by reference in subsection 69W-301.002(7), F.A.C.

Subsection (Page 50 of 60):

(c) Direct Fee Deduction. An investment adviser is not required to obtain an independent verification of client funds & securities maintained by a qualified custodian under paragraph (2)(f) of this rule if the investment adviser has custody solely as a consequence of its authority to make withdrawals from client accounts to pay its advisory fee & has written authorization from the client to deduct advisory fees from the account held with the qualified custodian. The Rule does not permit Adviser to forward Clients' funds and securities without having custody. However, Adviser's possession of a check drawn by the Client and made payable to a third party is not possession of Client funds for purposes of the custody definition provided the check is promptly forwarded to the account custodian. Clients must be instructed to ensure checks are made payable to the account custodian. All checks received from a Client must be recorded on a log.

The log should identify the date the check was received by the Advisory Representative, date the check was sent from Adviser, where the check was sent, identification of the check/certificate number, and identity of the Client account. Should a Client make a check payable to Adviser or send a stock certificate, the check or certificate must be recorded to the log and promptly returned to the Client. The SEC requires the check or certificate to be returned within three (3) business days of receipt. Under no circumstances may any Advisory Representative accept or deposit the check.

Advisers who are deemed to have custody must disclose the capacity on Form ADV Part 1A and may be required to include disclosure on Schedule F. However, if an Adviser is deemed to have custody solely due to the Adviser's ability to withdraw its fees from clients' accounts, the SEC has commented that the Adviser should respond to Item 9A (1) and (2) of Part 1A as "No."

However, Advisers subject to a state registration should check with their state securities commission to ensure that the state where the Adviser maintains its principal place of business is consistent with the SEC.

Rulemaking Authority 517.03(1), 517.1215 FS. Law Implemented 517.1215 FS. History-New 10-23-06, Amended 11-22-10, 9-22-14, 5-6-15.

Reference: 69W-600.132, Pages 47 - 52 of 60.

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#### Notifications

Adviser hereby notifies the Office of Financial Regulation that it has answered "No" to Item 9A (1) & (2) per the Investment Adviser Registration Depository (IARD) system &/or SEC's guidance under Rule 206(4)-2, as may be applicable, & intends to use the safeguards provided above.

Adviser hereby notifies Shareholders Service Group (SSG) that it has, & shall continue to, send to Clients, or shall have received from Clients, simultaneous or prior written notification of the amounts invoiced showing the amount of the fees & the specific manner in which the fees are calculated, including the time period(s) & value of assets, if any, on which the fees are based.

The Founder, Owner, President & Chief Compliance Officer of the Firm Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani who is also AboveRock LLC's Supervising, Examining & Examinations Principal & the Principal Executive Officer of, with respect to, & @ AboveRock LLC affirms that he, & the Firm's related persons shall ask, understand, inquire, seek clarity & abide by any requirements, rules or guidance (different from or in addition to) provided by or asked of, by the SEC, the Florida Office of Financial Regulation (FLOFR) or any other regulatory bureaucracy regarding matters pertaining to Custody.

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#### Item 16

##### Investment Discretion

AboveRock LLC establishes the Adviser-Client relationship with the Client with respect to Adviser's work. This Adviser-Client relationship begins & includes, but is not limited to, Adviser & Client signing & executing Firm & Custodian documents. Adviser, via such signed & executed documents, one of which is The Discretionary Investment Advisory & Asset Management (LPOA), authorizes Adviser to select the identity & amount (quantity) of securities to be bought or sold alongside determining the price & time at which a particular security is to be bought or sold in Client accounts.

Discretionary authorization provided to Adviser via the Firm's signed & executed documents, one of which is The Discretionary Investment Advisory & Asset Management (LPOA) may be limited with respect to registered investment companies ((more information @ [---

#### Limitations & Restrictions](http://(colon)financial-dictionary(period)thefreedictionary(period)com/Registered+Investment+Comp any)) regarding Adviser's ability to trade securities & may also be limited by certain federal securities & tax legalities that require diversification of investments & favor the holding of investments once made.</p></div><div data-bbox=)

The Founder, Owner, President & Chief Compliance Officer of the Firm Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani who is also AboveRock LLC's Supervising, Examining & Examinations Principal & the Principal Executive Officer of, with respect to, & @ AboveRock LLC requires Clients to hand-write, in their own words, any limitations & restrictions regarding specific securities, investment holdings, types of investments &/or asset classes in the Investment Policy Statement (IPS) for such limitations & restrictions to be applied, implemented, adhered to, or followed.

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#### Item 17

##### Voting Client Securities

Clients are advised that Adviser, as a matter of Firm policy & practice, neither votes on proxies on a Client's behalf nor takes responsibility in any way to ensure that a Client's securities held in their accounts are voted. Clients retain the responsibility for receiving & voting their own proxies for any securities governed, supervised, administered & maintained in their portfolios.

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#### Item 18

##### Financial Information

The Founder, Owner, President & Chief Compliance Officer of the Firm Sir & Mr. Bharadwaj "Brad"

Venkata Sesha "V. S." Nippani who is also AboveRock LLC's Supervising, Examining & Examinations Principal & the Principal Executive Officer of, with respect to, & @ AboveRock LLC affirms that Adviser has no financial commitment that impairs the Firm's ability to meet contractual & Fiduciary commitments to Clients & has not been subject of a bankruptcy proceeding.

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Item 19

Requirements For State-Registered Advisers

Adviser Representative

Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani

Date of Birth

September 5, 1969

Education

Little Flower Junior College, Uppal, Hyderabad, AP, India

Attended from 1984 to 1986

Graduated in 1986 with an emphasis in Botany, Physics, Chemistry

Nizam College, Osmania University, Hyderabad, AP, India

Attended from 1986 to 1989

Graduated in 1989 with a Bachelors Degree in Genetics, Zoology, Chemistry

Pittsburg State University, Pittsburg, KS, USA

Attended from 1989 to 1992

Graduated in 1992 with a Bachelors & a Masters Degree in Business Administration

Business Background

AboveRock LLC - A Registered Investment Adviser

Position: Advisory Representative, President & Chief Compliance Officer

Duration: 01/2009 to Present

REARM LLC - A Florida Real Estate Company

Position: Qualifying Broker

Duration: 02/2010 to 05/2014 & 01/2015 to Present

Nippani & Associates LLC - A Wealth Management Firm

Position: President & CEO

Duration: 05/2003 to 03/2010

Brad V Nippani - Licensed Real Estate Broker (Sole Proprietor)

Position: Broker/Owner

Duration: 05/2007 to 02/2010

BrokersXpress LLC - A Registered Broker/Dealer

Position: Registered Representative & Advisory Representative

Duration: 12/2008 to 04/2009

First Allied Securities Inc. - A Registered Broker/Dealer

Position: Registered Representative

Duration: 05/2008 to 12/2008

First Advisors Inc. - A Registered Investment Adviser

Position: Advisory Representative

Duration: 01/2007 to 12/2008 (during which time this entity became First Allied Advisory Services, Inc.)

First Allied Advisory Services Inc. - A Registered Investment Adviser

Position: Advisory Representative

Duration: 01/2007 to 12/2008

FFP Securities Inc. - A Registered Broker/Dealer

Position: Registered Representative

Duration: 02/1997 to 12/2008

FFP Advisory Services Inc. - A Registered Investment Adviser

Position: Advisory Representative

Duration: 10/1997 to 01/2007

International Association of Registered Financial Consultants

Position: Member

Duration: 01/2001 to 01/2013

Clients are advised that the Founder, Owner, President & Chief Compliance Officer of AboveRock LLC Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani who is also the Adviser's Supervising, Examining & Examinations Principal & Principal Executive Officer, is also the Founder, Owner, President & Qualifying Broker of REARM LLC, a Florida Real Estate Company. He is not actively engaged in soliciting buyers &/or sellers or marketing this real estate business at the present time. He does, however, commit approximately 10% of his time toward CE & is actively engaged in his ongoing learning pertaining to this profession. Clients will never be advised or persuaded to obtain additional financing through real estate, or a larger mortgage, for purposes of investing into securities. More information regarding his license may be found at [www\(myfloridalicense\)com/dbpr](http://www.myfloridalicense.com/dbpr).

The Founder, Owner, President & Chief Compliance Officer of the Firm Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani who governs, supervises, administers, is responsible for, & births, journeys and arrives at one or more responsibilities, expectations & accountabilities regarding this matter and, on a continuous basis, identifies and records applicable factors, processes, policies & information in the Firm's documents, is the Sole Owner of the Adviser, a Florida Limited Liability Company. He is also the Adviser's Supervising, Examining & Examinations Principal & Principal Executive Officer.

The Founder, Owner, President & Chief Compliance Officer of AboveRock LLC Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani who is also the Adviser's Supervising, Examining & Examinations Principal & Principal Executive Officer, began his career in the financial services industry as a Registered Representative as well as an Investment Advisory Representative in 1997. In the years leading up to the establishment of AboveRock LLC in 2009, Mr. Nippani, while affiliated with a nationally recognized broker-dealer, headed an Office of Supervisory Jurisdiction (OSJ) (more information @ <http://www.finra.org/Industry/Compliance/Registration/QualificationsExams/RegisteredReps/Qualifications/p011104>) in the capacity of a Registered Principal here in Jacksonville, Florida. Since joining the industry (more information @ <http://www.finra.org/Investors/ToolsCalculators/BrokerCheck/>), Mr. Nippani has passed 2 Principal/Supervisory Exams (Series 24, Series 51), 2 General Industry/Product Exams (Series 6, Series 7) & 2 State Securities Law Exams (Series 63 & Series 65) (more information @ <http://www.finra.org/Industry/Compliance/Registration/QualificationsExams/RegisteredReps/Qualifications/p011051>). Lastly, Mr. Nippani held Life, Health & Variable Annuity Insurance Agent Licenses in Florida (resident) & Oklahoma (non-resident) until May 14, 2013 & May 19, 2013 respectively.

Adviser & Adviser Representative(s) may only transact business in a state if first registered, excluded, or exempted from state investment adviser & Adviser Representative registration requirements. Follow-up &/or individualized responses to persons in a state by Adviser or an Advisory Representative that involve either the effecting of or an attempt to effect, transactions in securities or the rendering of personalized investment advice for compensation may require registration first unless an exemption or exclusion is available.

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Item 20  
Annual Offer

Please consider this item as an Annual Offer to you, the Client, by Adviser to provide you with this Disclosure Brochure per Rule 204-3 of the Investment Adviser's Act. This document is also available on the Firm's site at [www\(period\)aboverock\(period\)com](http://www.aboverock.com) & on the SEC's Investment Adviser Public Disclosure site at [www\(period\)adviserinfo\(period\)sec\(period\)gov](http://www.adviserinfo.sec.gov).

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Form ADV  
Brochure Supplement

Item 1



Cover Page

Supervised Person & Adviser Representative

Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani

Supervised Person & Adviser Representative's Contact Information

T +1 904 535 2860 / T +1 904 365 8184

E [bvsn\(at\)aboverock\(period\)com](mailto:bvsn(at)aboverock(period)com)

Supervised Person & Adviser Representative's Principal Place Of Business Address

15977 Hutton Lane  
Jacksonville, Florida 32218 USA

Adviser

AboveRock LLC

Adviser's Principal Place Of Business Address

15977 Hutton Lane  
Jacksonville, Florida 32218 USA

Date of Brochure Supplement: January 1, 2019

This document, also referred to as the Brochure Supplement, provides information about the Founder, Owner, President & Chief Compliance Officer of AboveRock LLC Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani who is also the Adviser's Supervising, Examining & Examinations Principal & Principal Executive Officer that supplements the AboveRock LLC Firm Brochure. You should have received a copy of the Firm Brochure. Please contact the Founder, Owner, President & Chief Compliance Officer of AboveRock LLC Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani who is also the Adviser's Supervising, Examining & Examinations Principal & Principal Executive Officer of, with respect to, & @ AboveRock LLC if you did not receive AboveRock LLC's Brochure or if you have any questions about the contents of this supplement.

This document provides information about Mr. Nippani's education, business background & other pertinent information as required by rules, regulations & legality. If you have any questions about the contents of this Brochure, please contact the Founder, Owner, President & Chief Compliance Officer of AboveRock LLC Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani who is also the Adviser's Supervising, Examining & Examinations Principal & Principal Executive Officer at +1 904 535 2860.

The information in this Brochure Supplement has not been approved or verified by the United States Securities & Exchange Commission or by any state securities regulatory personnel.

Registration of an Investment Adviser, solely in & of itself, does not imply any level of skill or training. The oral & written communications of the Adviser Representative & the professional judgement of the Adviser Representative alongside the Adviser provide Clients with information about the Adviser Representative. This information assists Clients in arriving at the choice of whether to begin, or continue, a working relationship with an Adviser.

Additional information about the Founder, Owner, President & Chief Compliance Officer of AboveRock LLC Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani who is also the Adviser's Supervising, Examining & Examinations Principal & Principal Executive Officer since the beginning of our universe is available on the SEC's site at [www.\(period\)adviserinfo\(period\)sec\(period\)gov](http://www.(period)adviserinfo(period)sec(period)gov).

Additional information about the Founder, Owner, President & Chief Compliance Officer of AboveRock LLC Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani who is also the Adviser's Supervising, Examining & Examinations Principal & Principal Executive Officer of, with respect to, & @ AboveRock LLC since the beginning of time is available @ Google, Bing, Yahoo & other search engines, inter-galactic, federal, state, city & local data mining, data exploit & data, energy & earth weaponization sites, inter-galactic, federal, state, city & local archaeological excavation sites, & automated bots.

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Item 2

Education & Business Background

Supervised Person & Adviser Representative

Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani

Date of Birth

September 5, 1969

Education

Little Flower Junior College, Uppal, Hyderabad, AP, India

Attended from 1984 to 1986

Graduated in 1986 with an emphasis in Botany, Physics, Chemistry

Nizam College, Osmania University, Hyderabad, AP, India

Attended from 1986 to 1989

Graduated in 1989 with a Bachelors Degree in Genetics, Zoology, Chemistry

Pittsburg State University, Pittsburg, KS, USA

Attended from 1989 to 1992

Graduated in 1992 with a Bachelors & a Masters Degree in Business Administration

#### Business Background

AboveRock LLC - A Registered Investment Adviser

Position: Advisory Representative, President & Chief Compliance Officer

Duration: 01/2009 to Present

REARM LLC - A Florida Real Estate Company

Position: Qualifying Broker

Duration: 02/2010 to 05/2014 & 01/2015 to Present

Nippani & Associates LLC - A Wealth Management Firm

Position: President & CEO

Duration: 05/2003 to 03/2010

Brad V Nippani - Licensed Real Estate Broker (Sole Proprietor)

Position: Broker/Owner

Duration: 05/2007 to 02/2010

BrokersXpress LLC - A Registered Broker/Dealer

Position: Registered Representative & Advisory Representative

Duration: 12/2008 to 04/2009

First Allied Securities Inc. - A Registered Broker/Dealer

Position: Registered Representative

Duration: 05/2008 to 12/2008

First Advisors Inc. - A Registered Investment Adviser

Position: Advisory Representative

Duration: 01/2007 to 12/2008 (during which time this entity became First Allied Advisory Services, Inc.)

First Allied Advisory Services Inc. - A Registered Investment Adviser

Position: Advisory Representative

Duration: 01/2007 to 12/2008

FFP Securities Inc. - A Registered Broker/Dealer

Position: Registered Representative

Duration: 02/1997 to 12/2008

FFP Advisory Services Inc. - A Registered Investment Adviser

Position: Advisory Representative

Duration: 10/1997 to 01/2007

International Association of Registered Financial Consultants

Position: Member

Duration: 01/2001 to 01/2013

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#### Item 3

##### Disciplinary Information

Registered Investment Adviser (RIA) firms are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person who is providing investment advice.

The Founder, Owner, President & Chief Compliance Officer of AboveRock LLC Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani who is also the Adviser's Supervising, Examining & Examinations Principal & Principal Executive Officer, began his career in the financial services industry as a Registered Representative as well as an Investment Advisory Representative in 1997. In the years leading up to the establishment of AboveRock LLC in 2009, Mr. Nippani, while affiliated with a nationally recognized broker-dealer, headed an Office of Supervisory Jurisdiction (OSJ) (more information @

<http://www.finra.org/Industry/Compliance/Registration/QualificationsExams/RegisteredReps/Qualifications/p011104>) in the capacity of a Registered Principal here in Jacksonville, Florida. Since joining the industry (more information @ <http://www.finra.org/Investors/ToolsCalculators/BrokerCheck/>), Mr. Nippani has passed 2 Principal/Supervisory Exams (Series 24, Series 51), 2 General Industry/Product Exams (Series 6, Series 7) & 2 State Securities Law Exams (Series 63 & Series 65) (more information @ <http://www.finra.org/Industry/Compliance/Registration/QualificationsExams/RegisteredReps/Qualifications/p011051>). Lastly, Mr. Nippani held Life, Health & Variable Annuity Insurance Agent Licenses in Florida (resident) & Oklahoma (non-resident) until May 14, 2013 & May 19, 2013 respectively.

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Item 4  
Other Business Activities

Clients are advised that the Founder, Owner, President & Chief Compliance Officer of AboveRock LLC Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani who is also the Adviser's Supervising, Examining & Examinations Principal & Principal Executive Officer, is also the Founder, Owner, President & Qualifying Broker of REARM LLC, a Florida Real Estate Company. He is not actively engaged in soliciting buyers &/or sellers or marketing this real estate business at the present time. He does, however, commit approximately 10% of his time toward CE & is actively engaged in his ongoing learning pertaining to this profession. Clients will never be advised or persuaded to obtain additional financing through real estate, or a larger mortgage, for purposes of investing into securities. More information regarding his license may be found at [www\(myfloridalicense\)com/dbpr](http://www.myfloridalicense.com/dbpr).

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Item 5  
Additional Compensation

Adviser & Adviser Representatives do not have any arrangements, oral or in writing, where any person or entity, directly or indirectly, receive additional compensation.

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Item 6  
Supervision

The Founder, Owner, President & Chief Compliance Officer of AboveRock LLC Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani who is also the Adviser's Supervising, Examining & Examinations Principal & Principal Executive Officer of, with respect to, & @ AboveRock LLC.

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Item 7  
Requirements for State-Registered Advisers

Registered Investment Adviser (RIA) firms are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person who is providing investment advice.

The Founder, Owner, President & Chief Compliance Officer of AboveRock LLC Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani who is also the Adviser's Supervising, Examining & Examinations Principal & Principal Executive Officer, began his career in the financial services industry as a Registered Representative as well as an Investment Advisory Representative in 1997. In the years leading up to the establishment of AboveRock LLC in 2009, Mr. Nippani, while affiliated with a nationally recognized broker-dealer, headed an Office of Supervisory Jurisdiction (OSJ) (more information @ <http://www.finra.org/Industry/Compliance/Registration/QualificationsExams/RegisteredReps/Qualifications/p011104>) in the capacity of a Registered Principal here in Jacksonville, Florida. Since joining the industry (more information @ <http://www.finra.org/Investors/ToolsCalculators/BrokerCheck/>), Mr. Nippani has passed 2 Principal/Supervisory Exams (Series 24, Series 51), 2 General Industry/Product Exams (Series 6, Series 7) & 2 State Securities Law Exams (Series 63 & Series 65) (more information @ <http://www.finra.org/Industry/Compliance/Registration/QualificationsExams/RegisteredReps/Qualifications/p011051>). Lastly, Mr. Nippani held Life, Health & Variable Annuity Insurance Agent Licenses in Florida (resident) & Oklahoma (non-resident) until May 14, 2013 & May 19, 2013 respectively.

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Receipt

Adviser's Firm Brochure & Privacy Policy

By signing below, I/We acknowledge receipt of:

i). a copy of Adviser's Firm Brochure & Brochure Supplement) dated \_\_\_\_\_, 20\_\_\_\_, &  
ii). a copy of Adviser's Privacy Policy provided to me/us separately & available on Adviser's site for my/our review & records dated \_\_\_\_\_, 20\_\_\_\_\_.

\_\_\_\_\_  
Client Name (Print)

\_\_\_\_\_  
Client Signature Date Signed

\_\_\_\_\_  
Client Name (Print)

\_\_\_\_\_  
Client Signature Date Signed

\_\_\_\_\_  
Client Address

\_\_\_\_\_  
Adviser Representative's Name (Print)

\_\_\_\_\_  
Adviser Representative's Signature Date Signed

\_\_\_\_\_  
Adviser Representative's Address

\_\_\_\_\_  
The Founder, Owner, President & Chief Compliance Officer Name (Print)

AboveRock LLC

\_\_\_\_\_  
The Founder, Owner, President & Chief Compliance Officer's Signature Date Signed

\_\_\_\_\_  
Adviser's Mailing Address

Services Offered Through AboveRock LLC - A Registered Investment Adviser.