

Item 1:  
RoseMark Advisors, Inc.  
Part 2A of Form ADV  
The Brochure

145 Marcus Blvd, Suite 1, Hauppauge, NY 11788  
[www.rosemarkadvisors.com](http://www.rosemarkadvisors.com)

Updated: March 2018

This brochure provides information about the qualifications and business practices of RoseMark Advisors, Inc. (“RMA”). If you have any questions about the contents of this brochure, please contact us at 631-699-2664. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about RMA is also available on the SEC’s website at: [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Registration as an investment adviser, or any reference to the firm being or the use of the term “registered”, “registration” or “registered investment adviser” does not imply a certain level of skill or training.**

## Item 2: Material Changes

RMA’s original submission of Part 2 of Form ADV was made in March 2016. This brochure is a revision of the disclosure submitted in March 2017. There have been material changes to the brochure since March, 2017.

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## Item 4: Advisory Business

RMA was founded in 2013 and is owned by John D. Caffrey, Matthew M. Racanelli, Rebecca R. Keiffert and Daniel C. Weber. RMA is seeking registration with the SEC because it shares its principal office, place of business, and is under common control, with Castle Asset Management, LLC (“Castle”), an SEC registered investment adviser. RMA primarily provides Financial Planning and / or Cash Flow Modeling, for the members of The Association of Mature American Citizens (AMAC). In addition, the firm acts as a solicitor for Castle with respect to those RMA clients who wish to receive investment management services. RMA is a solicitor for Castle Asset Management, LLC, an affiliated investment advisor.

## A. Financial Planning and Cash Flow Modeling

The financial planning and / or cash flow modeling services that RMA provides, generally will address the following areas:

**Financial Organization:** Aid a client in the organization of their important financial documents and determining their personal financial objectives. The purpose is to provide the client with a clear understanding of their current financial position and pointing out specific areas of concern.

**Risk Management:** Identify issues that relate to safeguarding client's assets and other personal property from potential risk and/or liability. Implement the necessary process or product to protect the financial interest of a family in the event of a death or a debilitating illness or injury of a family member.

**Income Tax & Cash Flow Analysis:** Review the ongoing expenses needed by a client to run their household. Identify expense items that can be redirected to savings and investment. Investigating income tax savings measures or debt restructure techniques to improve cash flow.

**College Funding:** Project the future college costs and review programs that help a client provide the needed capital to meet this future (or current) expense.

**Investment Analysis:** Collect the current investment information owned by a client to organize the necessary input for a cash flow model. If necessary, refer the client to an appropriate registered investment advisory firm that will suggest investment alternatives that may be appropriate and consistent with the client's financial plan.

**Retirement Planning:** Review the client's personal and employer sponsored retirement programs. Consider new strategies that could be introduced that help a client meet their retirement goals. Identify the qualified plan options that are available and determine the viability of these plans for clients who are business owners.

**Distribution Planning:** Determine a methodology for a client to access their wealth in retirement in a way that is consistent with their cash flow needs and income tax concerns. This methodology may also serve to protect the interests of a surviving spouse.

**Estate Planning:** Coordinate asset titling, beneficiary designations and other ownership arrangements with the estate plan executed by a qualified attorney selected by the client.

Our financial plan, and / or cash flow modeling, is based on gathering the required information to draft a financial plan or model, through a personal interview with client(s). Information gathered includes the client's current financial status, current and future goals and attitudes toward risk. The client is asked to provide various documents to support the information gathered during these interviews. RMA suggests that a client who chooses to implement the recommendations contained in the financial plan work closely with their other professional advisors. The implementation of the planning recommendations is solely at the client's discretion. The client may implement the planning recommended through RMA and / or their professional associations.

## B. Solicitor for affiliated investment adviser

RMA also acts a solicitor for Castle, with which RMA shares its principal office, place of business and is under common control. RMA may receive solicitor compensation from Castle for the referral of clients to Castle pursuant to a written solicitation agreement between RMA and Castle. Upon engaging Castle, the client will receive a copy of Castle's Form ADV disclosure brochure and a separate disclosure statement discussing RMA's relationship with Castle and the fee that RMA will receive for the referral.

## **Item 5: Fees and Compensation**

### 1. Financial Planning Program:

RMA may charge a fee when Financial Plans or Cash Flow Models are prepared for clients and fees may be collected based upon the level of service provided. The fee for each plan is quoted in advance, but not prepaid. Financial Planning Fees are negotiable and often the service is provided without a fee.

At the discretion of the Advisor, fixed fees may be charged for financial planning services. The fixed fees charged to a client, for the preparation of a financial plan, typically range from \$500 to \$5,000. All financial planning fees are quoted in advance, prior to the commencement of any work. One half of the fee is collected upon the financial planning engagement and the balance is due upon the completion of the written financial plan.

A client may terminate its agreement with RMA at any time if not satisfied with the services provided. If the agreement is terminated within five days of acceptance, such client will receive a full refund. Also, if RMA does not give a client a copy of their disclosure brochure at least 48 hours prior to execution of our agreement, such client shall have five days from the date of execution of the agreement to terminate services for a full refund.

### 2. Referral Fee Services:

Advisor is a solicitor for Castle Asset Management, LLC an affiliated investment adviser that has agreed to pay an ongoing referral fee for any such client referrals made by the Advisor. As a solicitor, any potential conflict of interest will be fully disclosed to any individual who may be referred. The amount of the ongoing referral fee will be negotiated with Castle and fully disclosed to the client. The typical ongoing referral fee will range from .25% - 1% of the fee earned by Castle. In the event a referred client terminates its arrangement with Castle, any unearned fees will be refunded immediately. Advisor presently has a solicitation arrangement with Castle Asset Management, LLC. Castle Asset Management, LLC is registered as an investment advisor. Advisor will continue to receive solicitor compensation as long as the client's funds remain under Castle's management.

### 3. Insurance Commission Revenue:

RMA is licensed in 50 states to provide Life, Long Term Care and Long Term Disability insurance. It also serves as an insurance broker through its relationship with Voya, Transamerica, Mutual of Omaha and Crump Insurance Services. It also is licensed in 50 states to provide fixed, immediate and indexed annuities.

#### RMA's Budget Tool:

RMA will receive revenue upon the sale of its proprietary budget tool. The typical cost to the member is a one-time payment of \$14.95.

Certain representatives of RMA are registered as representatives of separate broker dealers and / or also insurance agents/brokers of various insurance companies. RMA and its representatives will earn additional income in the form of commissions in the event a client chooses to purchase insurance products, investments products or investment advisory services from them. The earnings realized by RMA or its representatives are not used to offset any fees billed for Financial Planning or Consulting Services.

RMA's Vice President, John D. Caffrey, in his capacity as a registered representative of Purshe Kaplan Sterling Investments, may earn additional compensation if a client purchases mutual funds or other investment products through Purshe Kaplan Sterling Investments. This compensation is in the form of commissions and 12b1 fees. This conflict arises because a client may be referred to Castle for investment management services and through Castle, John may be in a position to purchase mutual funds or other investment products as part of Castle providing services to the client's account. Because John D. Caffrey may receive this economic benefit, a potential conflict of interest arises if he recommends to clients that they purchase mutual funds or other investment products through Purshe Kaplan Sterling Investments. This gives John D. Caffrey an incentive to recommend mutual funds and investment products based on the compensation he may receive, rather than on a client's need. Nonetheless, we believe that we have addressed this conflict of interest because we have required the solicitation agreement with Castle to include a covenant that no referred client will be under any obligation to purchase mutual funds or investment products through Purshe Kaplan Sterling Investments or John D. Caffrey, and that referred clients will have the option to purchase mutual funds and investment products that John D. Caffrey recommends through other brokers or agents not affiliated with Castle or RMA. Any commission/fee that John D. Caffrey receives from the sale of mutual funds or investment products is in addition to the advisory fees Castle charges and the RMA fee. Neither RMA's nor Castle's fees will be reduced to offset the commission/fee he receives.

John D. Caffrey earns additional compensation from insurance companies in the form of initial and renewal compensation for all life, disability, health or long-term care insurance put in force and after the first policy year. The principal officer of Advisor, John D. Caffrey is a licensed insurance agent with The Guardian Life Insurance Company of America, Schneider & Schulman Brokerage Services, Inc., Crump Life Insurance Services, Mass Mutual Financial Group and Security Mutual Life Insurance Co. of NY and may receive compensation for the sale of insurance products from Advisory and non-Advisory clients.

Matthew M. Racanelli earns additional compensation from insurance companies in the form of initial and renewal compensation for all life, disability, health or long-term care insurance put in force and after the first policy year. Matthew M. Racanelli is a licensed insurance agent with Crump Life Insurance Services, Mass Mutual Financial Group and Security Mutual Life Insurance Co. of NY and may receive compensation for the sale of insurance products from Advisory and non-Advisory clients. Matthew M. Racanelli also earns additional compensation as a direct solicitor for Castle Asset Management, LLC.

Rebecca R. Keiffert earns additional compensation from insurance companies in the form of initial and renewal compensation for all life, disability, health, long-term care and property and casualty insurance put in force and after the first policy year. Rebecca R. Keiffert is a licensed insurance agent through Hometown

Insurance Agency, Inc. and may receive compensation for the sale of insurance products from Advisory and non-Advisory clients. Rebecca R. Keiffert is the Senior Vice President and an owner of Association of Mature American Citizens, Inc., since 2009. She may receive compensation from the operations of AMAC.

Daniel C. Weber earns additional compensation from insurance companies in the form of initial and renewal compensation for all life, disability, health, long-term care and property and casualty insurance put in force and after the first policy year. Daniel C. Weber is a licensed insurance agent through Hometown Insurance Agency, Inc. Daniel C. Weber is the Founder, President and an owner of the Association of Mature American Citizens, AMAC, since 2007. He may receive compensation from the operations of AMAC.

Please see further information in Item 10, relating to the additional registrations disclosed in this Item 5, including information pertaining to conflicts of interest arising out of these other registrations of RMA and RMA personnel.

RMA's fees for services are negotiable. In the event that RMA's Advisory services are terminated, a client will receive a refund of any unearned portion of the Advisory fee. RMA will calculate the pro-rata unearned portion and promptly refund such amount, if any. Please see additional information in Item 12, Brokerage Practices.

## **Item 6: Performance Based Fees and Side-by-Side Management**

RMA does not charge any performance fees. Some investment Advisors experience conflicts of interest in connection with the side-by-side management of accounts with different fee structures. However, these conflicts of interest are not applicable to RMA.

## **Item 7: Types of Clients**

RMA may provide Financial Planning and Cash Flow Models for individuals and their associated trusts, estates, pension and profit sharing plans, corporations or other legal entities that are members of AMAC. AMAC members may pay an annual membership fee to AMAC to gain access to member benefits that includes RMA's financial planning and cash flow modeling process.

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

RMA does not provide investment analysis. RMA is a solicitor for Castle Asset Management, LLC, an affiliated investment advisor. RMA's representatives, do not provide investment advice but may perform the services described in Item 4. RMA's representatives may only provide products and services that are approved by RMA.

All investing involves a risk of loss that clients should be prepared to bear.

## **Item 9: Disciplinary Information**

RMA and its employees have not been involved in any legal or disciplinary events in the past that would be material to a client's evaluation of the company or its personnel.

## **Item 10: Other Financial Industry Activities and Affiliations**

John D. Caffrey is also a registered representative for Purshe Kaplan Sterling Investments, member of FINRA, SIPC located at 18 Corporate Woods Blvd, Albany, NY 12211. The telephone number is 800-801-6851. Mr. Caffrey is able to implement recommended securities products with his clients or clients of RMA for separate compensation from Purshe Kaplan Sterling Investments. Compensation is paid in the form of commissions directly to Mr. Caffrey from Purshe Kaplan Sterling Investments. Clients are not obligated to purchase securities or investment products from John D. Caffrey. Clients are permitted to choose freely to effect securities or investment products through any Broker/Dealer.

John D. Caffrey is on the Board of Directors for Empire National Bank. RMA or John D. Caffrey does not receive monetary compensation for referrals from Empire National Bank.

The principal officer of Advisor, John D. Caffrey is a licensed insurance agent with The Guardian Life Insurance Company of America, Schneider & Shulman Brokerage Services, Inc., Crump Life Insurance Services, Mass Mutual Financial Group and Security Mutual Life Insurance Co. of NY and may receive compensation for the sale of insurance products from Advisory and non-Advisory clients. John D. Caffrey is also the sole owner of Castle Financial Advisors, LLC, which is an entity that maintains an insurance license.

For clients who purchase products causing commissions to be generated from such purchases, these commissions are paid to John D. Caffrey in his separate capacity as an insurance agent. This activity represents a conflict of interest and gives him an incentive to recommend the purchase of insurance products for a client account based on that person's ability to receive compensation from such a purchase, rather than based on a client's needs. However, RMA believes that it has addressed this conflict by (a) requiring that any such transaction will be on commercially reasonable terms that are generally consistent with industry standards, and (b) neither requiring nor expecting that a client will purchase any such insurance product from or through John D. Caffrey. In addition, John D. Caffrey must maintain compliance with applicable rules and regulations that govern the sale of such products. All AMAC/RMA member Life, Long Term Care and Disability Insurance policies implemented during the financial planning, cash flow modeling or insurance planning process, will be placed through the appropriate RMA insurance license. For additional information related to RMA and its insurance licenses, please review item 5, section 3.

John D. Caffrey is a 25% owner of RMA. RMA is the financial services division of AMAC. Through RMA's marketing process, the members of AMAC have access to the financial planning and cash flow modeling process of RMA. John D. Caffrey, may receive compensation from the business activities of RMA. RMA does not provide Investment Advisory Services. RMA acts as a solicitor for Castle, with which RMA shares its principal office, place of business and is under common control. Pursuant to a written solicitation agreement between RMA and Castle, RMA may receive solicitor compensation from Castle for the referral of investment advisory clients to Castle. Upon engaging Castle, the client will receive a copy of Castle's Form ADV disclosure brochure and a separate disclosure statement discussing RMA's relationship with Castle and the fee that RMA will receive for the referral. Castle provides the Investment Advisory Services for AMAC/RMA clients.

John D. Caffrey may earn additional compensation from the following real estate management companies; John D. Caffrey is a 33 percent owner of 145 Marcus Realty, LLC. John D. Caffrey is a 43 percent owner

of 201 - 205 South Ocean Realty, LLC. , LLC. John D. Caffrey is a 9 percent owner of 96 S. Ocean Ave., LLC and a 33 percent owner of Mogul Men.

Matthew M. Racanelli is a licensed insurance agent with Crump Life Insurance Services, Mass Mutual Financial Group and Security Mutual Life Insurance Co. of NY and may receive compensation for the sale of insurance products from Advisory and non-Advisory clients. Matthew M. Racanelli also earns additional compensation as a direct solicitor for Castle Asset Management, LLC. For clients who purchase products causing commissions to be generated from such purchases, these commissions are paid to Matthew M. Racanelli in his separate capacity as an insurance agent. This activity represents a conflict of interest and gives him an incentive to recommend the purchase of insurance products for a client account based on that person's ability to receive compensation from such a purchase, rather than based on a client's needs. However, RMA believes that it has addressed this conflict by (a) requiring that any such transaction will be on commercially reasonable terms that are generally consistent with industry standards, and (b) neither requiring nor expecting that a client will purchase any such insurance product from or through Matthew M. Racanelli. In addition, Matthew M. Racanelli must maintain compliance with applicable rules and regulations that govern the sale of such products. All AMAC/RMA member Life, Long Term Care and Disability Insurance policies implemented during the financial planning, cash flow modeling or insurance planning process will be placed through the appropriate RMA license. For additional information related to RMA and its insurance license, please review item 5, section 3.

Matthew M. Racanelli is a 25% owner of RMA. RMA is the financial services division of AMAC. Through RMA's marketing process, the members of AMAC have access to the financial planning and cash flow modeling process of RMA. Matthew M. Racanelli, may receive compensation from the business activities of RMA. RMA does not provide Investment Advisory Services. RMA acts as a solicitor for Castle, with which RMA shares its principal office, place of business and is under common control. Pursuant to a written solicitation agreement between RMA and Castle, RMA may receive solicitor compensation from Castle for the referral of investment advisory clients to Castle. Upon engaging Castle, the client will receive a copy of Castle's Form ADV disclosure brochure and a separate disclosure statement discussing RMA's relationship with Castle and the fee that RMA will receive for the referral. Castle provides the Investment Advisory Services for AMAC/RMA clients.

Matthew M. Racanelli may earn additional compensation from J&L, LLC. J&L, LLC is a real estate management company.

Matthew M. Racanelli does earn additional compensation from his employment with The Association of Mature American Citizens, Inc.

Matthew M. Racanelli does earn additional compensation from his employment with AMAC Senior Resources Network Inc.

Rebecca R. Keiffert is the Senior Vice President and Editor-in-Chief, Mature American Citizens, Inc., the Senior Vice President and co-owner of Association of Mature American Citizens, Inc., the Chief Executive Officer and co-owner of AMAC Senior Resources Network, Inc., and founder and co-owner of AMAC Small Business Solutions. Ms. Keiffert is a Chartered Property Casualty Underwriter (CPCU) and a licensed insurance agent with Hometown Insurance Agency of Long Island. Ms. Keiffert was the Chief Operating Officer of Hometown Insurance Agency from 2000-2007, and as Chief Executive Officer since 2007. Ms.

Keiffert has served as the Chief Operating Officer of Hometown Firefighters, LLC and Hometown Benefits, Inc. since 2007. Ms. Keiffert became a partner of Service Award Associates, LLC in 2014. For clients who purchase products causing commissions to be generated from such purchases, these commissions are paid to Rebecca R. Keiffert in her separate capacity as an insurance agent. This activity represents a conflict of interest and gives her an incentive to recommend the purchase of insurance products for a client account based on that person's ability to receive compensation from such a purchase, rather than based on a client's needs. However, RMA believes that it has addressed this conflict by (a) requiring that any such transaction will be on commercially reasonable terms that are generally consistent with industry standards, and (b) neither requiring nor expecting that a client will purchase any such insurance product from or through Rebecca R. Keiffert. In addition, Rebecca R. Keiffert must maintain compliance with applicable rules and regulations that govern the sale of such products.

Rebecca R. Keiffert is a 25% owner of RMA. RMA is the financial services division of AMAC. Through RMA's marketing process, the members of AMAC have access to the financial planning and cash flow modeling process of RMA. Rebecca R. Keiffert, may receive compensation from the business activities of RMA. RMA does not provide Investment Advisory Services. RMA acts as a solicitor for Castle, with which RMA shares its principal office, place of business and is under common control. Pursuant to a written solicitation agreement between RMA and Castle, RMA may receive solicitor compensation from Castle for the referral of investment advisory clients to Castle. Upon engaging Castle, the client will receive a copy of Castle's Form ADV disclosure brochure and a separate disclosure statement discussing RMA's relationship with Castle and the fee that RMA will receive for the referral. Castle provides the Investment Advisory Services for AMAC/RMA clients.

Daniel C. Weber is the founder and President of the Association of Mature American Citizens, AMAC, since 2007. He is the co – owner of Senior Resources Network, AMAC Small Business Solutions, Inc. and the Founder and Chairman, of The AMAC Foundation a (501 (c)3 ) organization. Daniel C. Weber is a co-owner of Hometown Firefighter's Services and Platinum Benefits Team. Daniel C. Weber, is also a retired insurance broker from Allstate Insurance, Travelers and AXA / Equitable. He held the Series 6 and Series 7 licenses, but since his retirement, he is no longer licensed with or affiliated with a member firm of FINRA. For clients who purchase products causing commissions to be generated from such purchases, these commissions are paid to Daniel C. Weber in his separate capacity as an insurance agent. This activity represents a conflict of interest and gives him an incentive to recommend the purchase of insurance products for a client account based on that person's ability to receive compensation from such a purchase, rather than based on a client's needs. However, RMA believes that it has addressed this conflict by (a) requiring that any such transaction will be on commercially reasonable terms that are generally consistent with industry standards, and (b) neither requiring nor expecting that a client will purchase any such insurance product from or through Daniel C. Weber. In addition, Daniel C. Weber must maintain compliance with applicable rules and regulations that govern the sale of such products.

Daniel C. Weber is a 25% owner of RMA. RMA is the financial services division of AMAC. Through RMA's marketing process, the members of AMAC have access to the financial planning and cash flow modeling process of RMA. Daniel C. Weber, may receive compensation from the business activities of RMA. RMA does not provide Investment Advisory Services. RMA acts as a solicitor for Castle, with which RMA shares its principal office, place of business and is under common control. Pursuant to a written solicitation agreement between RMA and Castle, RMA may receive solicitor compensation from Castle for the referral of investment advisory clients to Castle. Upon engaging Castle, the client will receive a copy of Castle's Form ADV disclosure brochure and a separate disclosure statement discussing RMA's relationship

with Castle and the fee that RMA will receive for the referral. Castle provides the Investment Advisory Services for AMAC/RMA clients.

Daniel C. Weber May earn additional compensation from 401 K, Inc., Roth IRA, Inc., Gimmie Info.com. Daniel C. Weber is a 100 percent owner of all of these entities.

Please also see the discussion in Item 5 of this Disclosure Brochure concerning RMA's solicitation arrangement with Castle Asset management, LLC. RMA may be viewed to have an incentive to recommend the services of those companies because RMA may become entitled to receive compensation as a result of those recommendations. Nonetheless, no client is obligated to utilize the services of Castle Asset Management, LLC, and any recommendation RMA makes to those entities will be made where RMA determines that it is in the client's interests.

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

RMA shares its principal office and place of business, and is under common control, with Castle, an SEC registered investment adviser. This may create a potential conflict of interest in the sense that it is remotely possible that Advisor or its employees may benefit financially from a transaction effected for a client account by Castle, although the volume of such securities transactions have not and do not rise to the level where any transaction in the account of either of the firm or any firm personnel has any appreciable impact on the market value of a security. If the possibility of a conflict of interest occurs, the client's interest will prevail. It is the policy of Advisor that priority will always be given to the client's orders over the orders of an employee of the Advisor. Advisor and its employees shall not buy or sell securities for their personal account(s) where their decision is derived, in whole or in part, by information obtained as a result of his/her employment unless the information is also available to the investing public upon reasonable inquiry. In order to minimize this conflict of interest, securities recommended by Advisor are widely held and publicly traded. We also require that all personnel act in accordance with all applicable federal and state regulations governing registered investment Advisory practices. Any individual not in observance of the above may be subject to termination.

To avoid any potential conflicts of interest, Advisor has adopted written policies and procedures ("Code") for its employees, which includes a formal code of ethics and insider trading policies and procedures. Advisor's Code requires, among other things, that Employees:

- Act with integrity, competence, diligence, respect, and in an ethical manner with the public, clients, prospective clients, employers, employees, colleagues in the investment profession, and other participants in the global capital markets;
- Place the integrity of the investment profession, the interests of clients, and the interests of Advisor above one's own personal interests;
- Adhere to the fundamental standard that you should not take inappropriate advantage of your position;
- Avoid any actual or potential conflict of interest;
- Conduct all personal securities transactions in a manner consistent with this policy;

- Use reasonable care and exercise independent professional judgment when conducting investment analysis, making investment recommendations, taking investment actions, and engaging in other professional activities;
- Practice and encourage others to practice in a professional and ethical manner that will reflect credit on yourself and the profession;
- Promote the integrity of, and uphold the rules governing, capital markets;
- Maintain and improve your professional competence and strive to maintain and improve the competence of other investment professionals.
- Comply with applicable provisions of the federal securities laws.

Advisor's Code also requires Employees to: 1) pre-clear certain personal securities transactions, 2) report personal securities transactions on at least a quarterly basis, and 3) provide the Advisor with a detailed summary of certain holdings (both initially upon commencement of employment and annually thereafter) over which such Employees have a direct or indirect beneficial interest.

A copy of Advisor's Code shall be provided to any client or prospective client upon request.

## **Item 12: Brokerage Practices**

Advisor is a solicitor for Castle, an affiliated investment advisor, with which RMA shares its principal office, place of business and is under common control. As a solicitor, any potential conflict of interest will be fully disclosed to any client that may be referred by RMA. The amount of the on-going referral fee will be negotiated with Castle, the investment advisor. The typical on-going referral fee will range from .25% - 1% of the fee earned by Castle. In the event a referred client terminates its arrangement with Castle, any unearned fees will be refunded immediately. Advisor presently has a solicitation arrangement with Castle. Castle is registered as an investment advisor. RMA will continue to receive solicitor compensation as long as the client's funds remain under the management of Castle, the investment advisor. RMA does not provide investment analysis or advice. RMA representatives may only provide products and services that are approved by RMA. RMA will not be involved in the brokerage or custodian selection.

## **Item 13: Review of Accounts**

Client financial plans are reviewed by Advisor's representatives as requested by the client. Other factors that may trigger more frequent reviews include changes in the client's financial, personal or business circumstances. Clients may receive a written update of their financial plan as part of the review process described above. There isn't a specific review process for the life insurance policies placed for a member. A member may contact the insurance representative for typical insurance service issues. Examples of these services are; change of address or beneficiary designation changes.

Clients are kept fully informed about their portfolio activity by receiving copies of all transaction confirmations and monthly/quarterly statements directly from brokerage firms and/or custodians. Additionally, Advisor shall provide to each client correspondence directing the client to Morningstar performance reporting services through which the client may obtain a written report describing the performance, activity and holdings of the account on a quarterly basis.

## **Item 14: Client Referrals and Other Compensation**

RMA does not receive any other economic benefits from non-clients in connection with the provision of advisory services previously described to clients.

As stated previously, RMA acts as a solicitor for Castle, an affiliated investment advisor, with which RMA shares its principal office, place of business and is under common control. Pursuant to a written solicitation agreement between RMA and Castle, RMA may receive solicitor compensation from Castle for the referral of investment advisory clients to Castle. Upon engaging Castle, the client will receive a copy of Castle's Form ADV disclosure brochure and a separate disclosure statement discussing RMA's relationship with Castle and the fee that RMA will receive for the referral. Castle provides the Investment Advisory Services for AMAC/RMA clients.

## **Item 15: Custody**

All clients' accounts are held in custody by unaffiliated broker/dealers selected by Castle, an affiliated investment advisor, with which RMA shares its principal office, place of business and is under common control. Account custodians send statements directly to the account owners on at least a quarterly basis. Clients should carefully review these statements, and should compare these statements to any account information provided by RMA or Castle.

## **Item 16: Investment Discretion**

RMA does not have investment discretion over any investment accounts.

## **Item 17: Voting Client Securities**

RMA does not have investment discretion over any investment accounts. RMA will not exercise proxy voting authority over securities held in client accounts. The obligation to vote client proxies shall at all times rest with the client.

Should Advisor inadvertently receive proxy information for a security held in a client's account, then Advisor will make a good faith effort to forward such information on to Client in a timely manner, but will not take any further action with respect to the voting of such proxy.

## **Financial Information**

RMA has never filed for bankruptcy and is not aware of any financial condition that is expected to affect its ability to manage client relationships.

Item 1:  
RoseMark Advisors, Inc.  
Part 2B of Form ADV  
The Brochure Supplement

145 Marcus Blvd, Suite 1, Hauppauge, NY 11788  
[www.castleasset.com](http://www.castleasset.com)

Updated: March 2018

This brochure supplement provides information about John D. Caffrey, Matthew M. Racanelli, Rebecca R. Keiffert and Daniel C. Weber. It supplements RMA's accompanying Form ADV brochure. If you have any questions about the contents of this ADV brochure or supplement, or if you would like to request additional or updated copies of either document, please contact us at 631-699-2664.

Additional information about John D. Caffrey, Matthew M. Racanelli, Rebecca R. Keiffert and Daniel C. Weber, is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2: John D. Caffrey's Biographical Information

### Item 1: Educational Background and Business Experience

John D. Caffrey was born in 1961. He received a Bachelor of Science degree in Accounting from SUNY at Oswego in 1983 and a CFP from the College of Financial Planning, Denver CO, in 1988.

Qualifications and Description for the CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 76,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board's Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of

care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Mr. Caffrey has served as RMA's Chief Compliance Officer and Vice President since 2013. Mr. Caffrey is a 100 percent owner of Castle Financial Advisors, LLC and Castle Asset Management, LLC. He also serves as a registered representative of the Broker Dealer, Purshe Kaplan Sterling Investments from 2005 to Present.

#### Item 2: Disciplinary Information

Mr. Caffrey has not been involved in any legal or disciplinary events that would be material to a client's evaluation of Mr. Caffrey or of RMA.

#### Item 3: Other Business Activities

John D. Caffrey is on the Board of Directors for Empire National Bank. RMA or John D. Caffrey do not receive monetary compensation for referrals from Empire National Bank.

John D. Caffrey is on the Board of Directors for the AMAC Foundation. RMA or John D. Caffrey does not receive monetary compensation for referrals from the AMAC Foundation.

John D. Caffrey is a 25% owner of RMA. RMA is the financial services division of AMAC. Through RMA's marketing process, the members of AMAC have access to the financial planning and cash flow modeling process of RMA. John D. Caffrey, may receive compensation from the business activities of RMA. RMA acts as a solicitor for Castle, with which RMA shares its principal office, place of business and is under common control. RMA does not provide any Investment Advisory Services.

The principal officer of Advisor, John D. Caffrey is a licensed insurance agent with The Guardian Life Insurance Company of America, Schneider & Shulman Brokerage Services, Inc., Crump Life Insurance Services, Mass Mutual Financial Group and Security Mutual Life Insurance Co. of NY and may receive compensation for the sale of insurance products from Advisory and non-Advisory clients.

#### Mr. Caffrey's Employment History

Castle Financial Advisors, LLC  
Member since 2001

Castle Asset Management, LLC  
Member since 2004

RoseMark Advisors, Inc.  
Co-Owner since 2013

96 S. Ocean Ave., LLC  
Member since 2009

145 Marcus Realty, LLC  
Member since 2005

Mogul Men  
General Partner Since 2002

GDC Funding, LLC  
Member since 2005

Empire National Bank  
Board member since 2007

The Guardian Life Insurance Co  
Field Representative since 1995

201 - 205 South Ocean Realty, LLC  
Member since January 2014

Great American Advisors, Inc.  
Registered Representative 02/05 to 11/05

Purshe Kaplan Sterling Investments  
Registered Representative 11/05 to Present

Crescent Capital Group, LLC  
Member since 2009 – Present

#### Item 4: Additional Compensation

John D. Caffrey is on the Board of Directors for Empire National Bank. RMA or John D. Caffrey does not receive monetary compensation for referrals from Empire National Bank.

John D. Caffrey is a 25% owner of RMA. RMA is the financial services division of AMAC. Through RMA's marketing process, the members of AMAC have access to the financial planning and cash flow modeling process of RMA. John D. Caffrey, may receive compensation from the business activities of RMA. RMA does not provide Investment Advisory Services. RMA acts as a solicitor for Castle, with which RMA shares its principal office, place of business and is under common control.

As mentioned above, the principal officer of Advisor, John D. Caffrey is a licensed insurance agent with The Guardian Life Insurance Company of America, Schneider & Shulman Brokerage Services, Inc., Crump Life Insurance Services, Mass Mutual Financial Group and Security Mutual Life Insurance Co. of NY and may receive compensation for the sale of insurance products form Advisory and non-Advisory clients.

As a licensed Registered Representative with Purshe Kaplan Sterling Investments, Mr. Caffrey may, on a fully disclosed basis, effect securities transactions on behalf of Advisory clients as well as non-Advisory clients. Mr. Caffrey will typically receive securities related compensation for such transactions.

#### Item 5: Supervision

As RMA's co-founder and Vice President, Mr. Caffrey shares ultimate responsibility for the company's operations with Matthew M. Racanelli. Operational and Compliance decisions are discussed with RMA's Director of Operations Matthew M. Racanelli. Any of these individuals can be reached directly by calling the telephone number on the cover of this brochure supplement.

## **Item 2: Matthew M. Racanelli's Biographical Information**

#### Item 1: Educational Background and Business Experience

Matthew M. Racanelli was born in 1984 and received a B.S. in Finance from Boston University. Mr. Racanelli joined Paragon Food and Vending LLC directly out of school and was quickly promoted to the level of CFO. In 2010, Mr. Racanelli was the primary negotiator for the company's sale to Compass Group, a worldwide leader in the food service industry. Matthew spent the next year consulting for Compass to facilitate the efficient acquisition of Paragon. In early 2011, he joined Castle Financial Advisors, LLC and Castle Asset Management, LLC where he used both his knowledge of business and finance to serve his client's needs. In 2013 he was the co-founder of RoseMark Advisors, an organization which provides financial services to AMAC, The Association of Mature American Citizens. Matthew is also employed by The Association of Mature American Citizens, Inc.

#### Item 2: Disciplinary Information

Mr. Racanelli has not been involved in any legal or disciplinary events that would be material to a client's evaluation of Mr. Racanelli or of RMA.

Item 3: Other Business Activities

Mr. Racanelli is a licensed insurance agent with Crump Life Insurance Services, Mass Mutual Financial Group and Security Mutual Life Insurance Co. of NY and may receive compensation for the sale of insurance products from Advisory and non-Advisory clients. Matthew M. Racanelli also earns additional compensation as a direct solicitor for Castle Asset Management, LLC.

Mr. Racanelli's Employment History

Paragon Vending Member since 2005 - 2012	J & L, LLC Member since 2007
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The Association of Mature American Citizens, Inc. Since 2016	RoseMark Advisors, Inc. Co-owner since 2013
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AMAC Senior Resources Network Inc. Since 2017

Item 4: Additional Compensation

Matthew M. Racanelli is a 25% owner of RMA. RMA is the financial services division of AMAC. Through RMA's marketing process, the members of AMAC have access to the financial planning and cash flow modeling process of RMA. Matthew M. Racanelli, may receive compensation from the business activities of RMA. RMA acts as a solicitor for Castle, with which RMA shares its principal office, place of business and is under common control. RMA does not provide any Investment Advisory Services.

As mentioned above, the co-shareholder of Advisor, Mr. Racanelli is a licensed insurance agent with Crump Life Insurance Services, Mass Mutual Financial Group and Security Mutual Life Insurance Co. of NY and may receive compensation for the sale of insurance products from Advisory and non-Advisory clients. Matthew M. Racanelli also earns additional compensation as a direct solicitor for Castle Asset Management, LLC.

Item 5: Supervision

As RMA's co-founder and Vice President, Mr. Caffrey shares ultimate responsibility for the company's operations with Matthew M. Racanelli. Operational and Compliance decisions are discussed with RMA's Director of Operations Matthew M. Racanelli. Any of these individuals can be reached directly by calling the telephone number on the cover of this brochure supplement.

**Item 4: Rebecca R. Keiffert's Biographical Information**

Item 1: Educational Background and Business Experience

Rebecca R. Keiffert was born in 1970. Beginning in 1989, Ms. Keiffert has been a licensed insurance agent with Hometown Insurance Agency of Long Island. Ms. Keiffert has served as Chief Operating Officer of Hometown Insurance Agency from 2000-2007, and as Chief Executive Officer since 2007. Ms. Keiffert has served as the Chief Operating Officer of Hometown Firefighters, LLC and Hometown Benefits, Inc. since 2007. Ms. Keiffert is a Chartered Property Casualty Underwriter (CPCU)

Item 2: Disciplinary Information

Ms. Keiffert has not been involved in any legal or disciplinary events that would be material to a client's evaluation of Ms. Keiffert or of RMA.

Item 3: Other Business Activities

Ms. Keiffert has been:

Since 2014 - co-member of Service Award Associates, LLC.

Since 2007 - Senior Vice President and Editor-in-Chief, Mature American Citizens, Inc.

Since 2009 - Senior Vice President and owner of Association of Mature American Citizens, Inc.

Since 2011 - Chief Executive Officer and owner of AMAC Senior Resources Network

Since 2013 - co-owner of RoseMark Advisors, Inc., the financial services division of AMAC.

Since 2014 - Founder and co- owner of AMAC Small Business Solutions

Since 2016 – Baypoint Insurance Agency

Since 2016 – AMAC Real Estate Services, Inc.

Since 2016 – AMAC Brokerage Services, Inc.

Ms Keiffert 's Employment History

Hometown Insurance of LI, Inc.

Member since 1989

Hometown Firefighters, Inc.

Member since 2007

Association of Mature American Citizens, Inc.

Co-Owner since 2007

AMAC Senior Resources Network

Co-Owner since 2011

RoseMark Advisors, Inc.

Member since 2013

Hometown Travel Agency

Co-Owner since 2013

AMAC Small Business Solutions

Co-Owner since 2014

Service Awards Associates, LLC

Member since 2014

Baypoint Insurance Agency, Inc.

Co-Owner Since 2016

AMAC Real Estate Services, Inc.

Co-Owner Since 2016

AMAC Brokerage Services, Inc.

Co-Owner Since 2016

Item 4: Additional Compensation

Rebecca R. Keiffert is a 25% owner of RMA. RMA is the financial services division of AMAC. Through RMA's marketing process, the members of AMAC have access to the financial planning and cash flow modeling process of RMA. Rebecca R. Keiffert, may receive compensation from the business activities of RMA. RMA acts as a solicitor for Castle, with which RMA shares its principal office, place of business and is under common control. RMA does not provide any Investment Advisory Services.

As mentioned above, the co-shareholder of Advisor, is the Senior Vice President and Editor-in-Chief, Mature American Citizens, Inc., the Senior Vice President and co-owner of Association of Mature American Citizens, Inc., the Chief Executive Officer and co-owner of AMAC Senior Resources Network, Inc., a 25% owner of Hometown Travel Agency, the travel division of AMAC and founder and co-owner of AMAC Small Business Solutions. Ms. Keiffert is a licensed insurance agent with Hometown Insurance Agency of

Long Island. Ms. Keiffert was the Chief Operating Officer of Hometown Insurance Agency from 2000-2007, and as Chief Executive Officer since 2007. Ms. Keiffert has served as the Chief Operating Officer of Hometown Firefighters, LLC and Hometown Benefits, Inc. since 2007. Ms. Keiffert became a partner of Service Award Associates, LLC in 2014. Ms. Keiffert may earn additional compensation from insurance products sold or operational revenue from the various entities related to advisory or non advisory clients.

#### Item 5: Supervision

RMA's co-founder's, Mr. Caffrey and Mr. Racanelli share ultimate responsibility for the company's operations. Any of these individuals can be reached directly by calling the telephone number on the cover of this brochure supplement.

## **Item 5: Daniel C. Weber's Biographical Information**

#### Item 1: Educational Background and Business Experience

Daniel C. Weber was born in 1943. He enlisted in the US Air Force and served between 1961-1965. He was Honorable discharged in 1965. He attended State University of New York, Plattsburgh, on a Regents Scholarship. He began his insurance career as an Allstate Insurance, underwriter/agent in 1965. He was an agent for Allstate for 12 years and was a registered representative, Series 6 licensed in 1970 with Allstate. In 1980, he founded Hometown Insurance Agency and was licensed all lines of insurance. He was a registered representative, Series 7 licensed in 1984 with Travelers. Mr. Weber, was also a registered representative, Series 7 licensed with AXA / Equitable until he retired in 2009. He is no longer registered with FINRA. Daniel C. Weber is the founder and President of the Association of Mature American Citizens, AMAC, since 2007. He is the co – owner of Senior Resources Network, AMAC Small Business Solutions, Inc. and the Founder and Chairman, of The AMAC Foundation a (501 (c)3 ) organization. Daniel C. Weber is a co- owner of Hometown Firefighter's Services and Hometown Benefits, Inc.

#### Item 2: Disciplinary Information

Mr. Weber has not been involved in any legal or disciplinary events that would be material to a client's evaluation of Mr. Weber or of RMA.

#### Item 3: Other Business Activities

Mr. Weber has been:

Since 2014 - co-member of Service Award Associates, LLC.

Since 2007- Founder and owner of Association of Mature American Citizens, Inc.

Since 2011 - Owner of AMAC Senior Resources Network

Since 2013 - co-owner of RoseMark Advisors, Inc., the financial services division of AMAC.

Since 2014 - Founder and co- owner of AMAC Small Business Solutions

Since 2014 – Founder of Mature American Citizens, Inc.

Since 2016 - Co-owner of AMAC Real Estate Services, Inc.

Since 2016 – Member of Washington Home, LLC

Since 2016 – Co-Owner of Good Sense News, Inc.

Mr. Weber's Employment History

Hometown Firefighters, Inc.  
Member since 1989

Association of Mature American Citizens, Inc.      AMAC Senior Resources Network  
Founder and Co-Owner since 2007                      Co-Owner since 2011

RoseMark Advisors, Inc.                                      Hometown Travel Agency  
Member since 2013    Co-Owner since 2013

AMAC Small Business Solutions                              Service Awards Associates, LLC  
Co-Owner since 2014    Member since 2014

Mature American Citizens, Inc.                              Hometown Benefits, Inc.  
Since 2014    Since 2005

AMAC Real Estate Services, Inc.                              AMAC Brokerage Services, Inc.  
Co-Owner Since 2016    Co-Owner Since 2016

Item 4: Additional Compensation

Daniel C. Weber is a 25% owner of RMA. RMA is the financial services division of AMAC. Through RMA's marketing process, the members of AMAC have access to the financial planning and cash flow modeling process of RMA. Daniel C. Weber, may receive compensation from the business activities of RMA. RMA acts as a solicitor for Castle, with which RMA shares its principal office, place of business and is under common control. RMA does not provide any Investment Advisory Services.

As mentioned above, the co-shareholder of Advisor, founder and co-owner of Association of Mature American Citizens, Inc., co-owner of AMAC Senior Resources Network, Inc., , the travel division of AMAC and founder and co-owner of AMAC Small Business Solutions. Mr. Weber is a licensed insurance agent with Hometown Insurance Agency of Long Island. Mr. Weber is the Founder and co-owner of Hometown Firefighters, LLC and Hometown Benefits, Inc. since 2007. Mr. Weber became a partner of Service Award Associates, LLC in 2014. Mr. Weber may earn additional compensation from insurance products sold or operational revenue from the various entities related to advisory or non advisory clients.

Item 5: Supervision

RMA's co-founder's, Mr. Caffrey and Mr. Racanelli share ultimate responsibility for the company's operations. Any of these individuals can be reached directly by calling the telephone number on the cover of this brochure supplement.