

Form CRS
Part 3 of Form ADV – Rochester Investments - Relationship Summary

July 1, 2021

Introduction: Rochester Investments is a Securities and Exchange Commission, SEC, registered investment advisor. Registration does not imply a certain level of skill or training. Brokerage and investment advisory services and fees differ, and it is important for you to understand the difference. Free and simple tools are available to research firms and financial professional at Investor.gov/CRS which also provides educational materials about broker-dealers, investment advisers, and investing.

What investment services and advice can we provide you?: Rochester Investments and its Investment Advisor Representatives (“We” collectively) offer investment advisory services to retail investors. The services offered include assistance with developing and designing an investment strategy to help you to achieve your investment goals. We monitor your accounts on an ongoing basis and communicate with you periodically (but no less frequently than annually) through telephone, email, and in person meetings. We offer advisory accounts for which we exercise investment discretion, i.e. discretionary accounts. A discretionary account allows us to buy and sell investments in your account, without ask for your permission in advance. In your account we can trade stocks, bonds, mutual funds and ETFs. You will typically grant Rochester Investments, its Investment Advisor Representatives, and/or a third-party investment advisory firm, discretion to buy and sell investments in your account without asking you in advance. You may request a reasonable restriction on investing in certain securities or groups of securities. To open an account, the Advisor may require a minimum account size. For additional information, please refer to our Form ADV Part 2A.

Additional Questions to Ask
<p>Ask our financial professionals these key questions about our investment services and accounts.</p> <ol style="list-style-type: none">1. Given my financial situation, should I choose an investment advisory service? Why or why not? How will you choose investments to recommend to me?2. What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?

What fees will I pay?: If you open an investment advisory account with us, you will be charged an ongoing asset-based fee based on the value of cash and investments in your advisory account. The fees you will be charged are assessed quarterly in advance. Additionally, you may pay transaction-based fees when the Firm buys and sells an investment for you in addition to the management fees we charge you for our advisory accounts. The most common fees and costs applicable to your retail investors include custodian fees, account maintenance fees, fees related to mutual funds and variable annuities, and other transactional fees and product-level fees. You will pay fees to the custodian that holds your assets (called “**custody**”). *You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.*

Additional Questions to Ask
<p>Ask our financial professionals these key questions about the impact of fees and costs on investments.</p> <p>Help me understand how these fees and costs might affect my investments.</p> <p>If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?</p>

What are your legal obligations to me when acting as my investment advisor? How else does your firm make money and what conflicts of interest do you have?: *When we act as your investment advisor, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the*

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investment advice that we provide you. Here is an example to help you understand what that means.

- **Proprietary or Personnel Trading:** We may employ the same strategy for our personal investment accounts as we do for your investment advisory accounts. However, we are generally prohibited from buying or selling securities in our personal or proprietary accounts where this decision is substantially derived, in whole or in part, from our role as your investment advisor, unless the information is also available to the investing public on reasonable inquiry. As a matter of policy and practice, Rochester Investments does not generally block trade; we implement client transactions separately for each account.

Additional Questions to Ask
Ask our financial professionals these key questions about conflicts of interests. 1. How might your conflicts of interest affect me, and how will you address them?

How do our financial professionals make money?: Our financial professionals are compensated in the following ways: compensation in the form of an annual salary, and/or percentage of commissions from fees charged in managed accounts. Investment adviser representatives (“IARs”) are compensated on a percentage of commissions from fees charged in the accounts under their management.

Do we or our financial professionals have legal or disciplinary history?: No. Please visit Investor.gov/CRS for a free and simple search tool to research us and our financial professionals.

Additional Questions to Ask
Ask our financial professionals these key questions about our disciplinary history. 1. As a financial professional, do you have any disciplinary history? 2. If yes, for what type of conduct?

Item 5 – Additional Information

We encourage you to seek out additional information about our investment advisory services and to request a copy of this relationship summary by contacting:

Diana Apostolova, Rochester Investments, 1580 W Ridge Rd, Rochester, NY 14615,
phone: 585-568-6656, email: dsa@RochesterInvestments.com, website: www.RochesterInvestments.com

For additional information on our investment advisory services, see our Form ADV Part 1A and Part 2A Brochure on <http://RochesterInvestments.com/>, adviserinfo.sec.gov or Investor.gov and any brochure supplement a financial professional provides.

Additional Questions to Ask
Ask our financial professionals these key questions about contact and complaints. 1. Who is my primary contact person? 2. Is he or she a representative of an investment adviser or broker-dealer? 3. Who can I talk to if I have concerns about how this person is treating me?