



**SYMPHONY**  
Retirement Partners, LLC

## **Symphony Retirement Partners LLC**

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**Form ADV Part 2A  
Firm Brochure  
March 25, 2026**

This Brochure provides information about the qualifications and business practices of Symphony Retirement Partners LLC. If you have any questions about the contents of this Brochure, please contact us via email at

[jkoshy@symphonyretirement.com](mailto:jkoshy@symphonyretirement.com)

. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission, or by any state securities authority.

Symphony Retirement Partners LLC is a registered investment advisory firm. Registration of an investment advisory firm does not imply a particular level of skill or training.

Additional information about Symphony Retirement Partners LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**ITEM 2****Material Changes**

## Annual Update

The Material Changes section of this brochure will be updated annually, or when material changes occur since the previous release of our Firm Brochure. This Item discusses only specific material changes that are made to this Brochure and provides our clients with a summary of such changes.

**Material Changes since the Last Update**

Since our last amendment filing on March 27, 2025, we have made the following material changes:

- Item 5: Fees and Compensation

**Full Brochure and Additional Information**

Full Brochure and additional information about Symphony Retirement Partners LLC are available via the SEC's website [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC's website also provides information about any persons affiliated with us who are registered or are required to be registered, as investment adviser representatives ("IAR").

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## Advisory Business

### FIRM INFORMATION

Symphony Retirement Partners LLC (“Symphony,” “we,” “us,” “our”), a Limited Liability Company formed in November 2018, is a registered investment advisory firm located in Round Rock, Texas, as of March 2019.

### PRINCIPAL OWNERS

Symphony is owned and controlled by John Koshy, its Managing Director and Chief Compliance Officer.

### INVESTMENT ADVISORY SERVICES

#### Investment Management Services:

We provide investment management services in which we manage and provide continuous and ongoing supervision of your custodial accounts on both a discretionary and non-discretionary basis. Our services provide additional investment opportunities among stocks, bonds, mutual funds, exchange-traded funds (ETFs), Real Estate Investment Trusts (REITs), options, and additional securities.

#### Financial Planning and Consulting Services:

We provide financial planning services that find ways to help you understand your overall financial situation and help you set financial objectives. We offer two types of Financial Planning.

**ESSENTIAL PLANNING** includes the development of a goals based financial plan to identify potential gaps and planning opportunities on a year-round basis. This plan includes the following:

- Current Investments
- Evaluation
- Allocation Guidance

#### Risk Management (Addresses the following areas)

- Life, Disability, Long Term Care - Gap analysis & Implementation
- General Estate guidance

#### Retirement (Addresses the following areas)

- Am I saving enough?
- Will money last in retirement?
- Risks in current retirement planning?
- Adjustments required for goal

**ADVANCED PLANNING** includes the development of an in-depth cash flow analysis and financial modeling to identify potential gaps and planning opportunities on a year-round basis. This plan includes the following:

- Identify and prioritize goals
- Coordinate with existing advisors
- Get organized on personal financial issues
- Employee benefits, pension & social security review
- Develop cash flow financial model
- Create ‘What if?’ scenarios
- Model financial impact of multiple goals
- Monitor expenses for realistic budget spend
- Track progress towards Financial Independence
- Act as the catalyst to get things done

**Retirement Plan Consulting Services:**

Symphony offers a variety of services to employer-sponsored retirement plans and their participants. Depending on the type of retirement plan and the specific arrangement with the plan’s sponsor, our services may include discretionary investment management services, nondiscretionary fiduciary services, and non-fiduciary retirement plan consulting services. Our service agreement will identify the specific services being provided.

Symphony does not provide advisory services to plan sponsors of employer-sponsored retirement plans for which it has been specifically engaged, however, we do provide a review of the plans investment performance report.

**Third Party Money Management Services:**

We may recommend third-party money managers (“TPMMs”) to manage part or the client’s entire portfolio. TPMMs may be recommended when the TPMMs’ philosophy, investment strategy, and style meets the client’s financial situation, investment objectives, and risk tolerance. The asset management services provided by the TPMMs, the compensation to be paid, and other terms of the relationship between the client and the TPMMs will be described in the TPMMs’ disclosure documents and its managed account agreement. We will receive a portion of the investment advisory fee paid by the client to the TPMMs.

**CLIENT INVESTMENT OBJECTIVES/RESTRICTIONS**

Symphony offers the same suite of services to all our clients. However, specific client financial plans and their implementation are dependent upon the individual client’s Investment Policy Statement which outlines a client’s current financial situation such as income, net worth and risk tolerance levels. This information is essential in the development of a client-specific plan in the selection of investments that matches restrictions, needs, and targets. On a case by case basis, our clients may impose restrictions on investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent us from properly servicing the client’s account, or if the restrictions would require us to deviate from our standard suite of services, we reserve the right to end the relationship. We may request additional information and documentation such as current investments, tax returns, insurance policies, and estate plan. We will discuss your investment objectives, needs, and goals, but you must

inform us of any changes. Unless directed by you, we do not independently verify any information provided to us by you or your attorney, accountant or other professionals.

**WRAP FEE PROGRAMS**

Symphony does participate in, recommend, or offer wrap fee programs.

**ASSETS UNDER MANAGEMENT**

As of December 31, 2025, Symphony manages \$39,207,496 on a discretionary basis only.

**ITEM 5 Fees and Compensation**

**ANNUAL FEES FOR ADVISORY SERVICES**

Symphony is compensated for providing investment management services by charging a fee based on the total assets under management.

The fees charged for financial planning services are negotiable and vary depending on the complexity of the process undertaken, the types of issues addressed, the scope of services provided and the frequency with which the services are rendered. All fees are agreed upon before entering into the Financial Planning and Consulting Agreement you sign.

Fees for retirement plan services are negotiated before the signing of the Retirement Planning and Consulting Agreement. The agreement language includes the negotiated fee, which will be charged as a percentage of the total retirement plan assets. Symphony will manage accounts that have a balance less than \$250,000.00 and those fees will be negotiated on a case-by-case basis.

The below ranges are the standard fee ranges that are typically charged.

Fee Schedule for Investment Management	
\$250,000 - \$1,000,000	1.0%
\$1,000,001-\$3,000,000	0.80%
>\$3,000,000	Negotiable

Financial Planning and Consulting Fee Schedule	
Essential Planning Fixed Fee	\$1,500
Advanced Planning Fixed Fee	\$2,500 - \$10,000

Fee Schedule for Employer Sponsored Retirement Plans	
\$0 - \$3,000,000	0.50%
\$3,000,001-\$5,000,000	0.35%
>\$5,000,000	Negotiable

**\*WE OFFER A 10% DISCOUNT FOR FINANCIAL PLANNING AND CONSULTING WHEN SPONSORED BY AN EMPLOYER GROUP OR ASSOCIATION.**

## **FEE BILLING & PAYMENT**

Investment management fees are invoiced and billed directly to you. Symphony's investment management fees are annual fees and may be negotiable. Investment management fees are paid quarterly in arrears. Payments are due on the first day of the calendar quarter and are based on the account's asset value as of the last business day of the prior calendar quarter multiplied by the applicable annual rate and divided by four (4). The fee for the prior quarter is billed and payable within ten (10) days after the end of the prior quarter, based on the value of Client's account on the last business day of that quarter. Payments are due by the end of the quarter. The fee billing will be pre-determined in writing in the investment advisory agreement that is executed by you and Symphony. We will deduct our asset management fee only when in receipt of your written authorization by executing an investment advisory agreement permitting the fees to be paid directly from your account. We will send a copy of your invoice to the custodian at the same time that we send a copy to you. The qualified custodian will deliver an account statement to you at least quarterly which will show all disbursements from your account. We urge you to review all statements for accuracy.

Financial planning and consulting fees will be assessed as a fixed fee for ongoing services. For Essential Planning, the fixed fee will be due upon executing the Financial Planning and Consulting Agreement. For Advanced planning the client will pay \$500 upon executing the Financial Planning and Consulting Agreement, with the remaining balance due upon completion of the plan, payable monthly or quarterly. The service will continue throughout the remainder of the year where the plan will be reviewed and updated as needed. Clients will have the option to renew each year. In no case will Symphony require a fee of \$500 or more to be paid 6 months or more in advance. Financial planning and consulting fees are paid via credit card, check, or third-party payment processor.

Retirement plan consulting fees will be billed on a quarterly basis, in arrears, at the end of each calendar quarter, due within thirty (30) days after date of invoice, unless otherwise agreed to by the parties. The fee will either be billed directly to the plan sponsor or paid directly from the plan assets if authorized by the plan fiduciary.

In TPMM accounts, the adviser deducts the advisory fee from the client's account quarterly in arrears and then will forward a portion of the fee to our firm. The total fee paid by the client to Symphony will be 1% of the client's assets under management. We urge our clients to refer to the selected TPMM's disclosure documents for exact fees and expenses charged by each such TPMM, as well as minimum account requirements, refund, and termination provisions. A complete description of each program can be found in disclosure materials prepared by the TPMM, which we will provide to the client at the time we recommend the program. Some TPMM's will bill based on the average daily balance for the quarter instead of the last day of the quarter. Clients will be informed of this upon signing the advisory agreement.

You are responsible for all third-party fees (i.e., custodian fees, mutual fund fees, transaction fees, etc.). These fees are separate and distinct from the fees and expenses charged by Symphony.

## **TERMINATION OF AGREEMENT**

Either party may terminate the investment advisory agreement by providing 30-day advance written notice. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable up to and including the effective date of termination.

Notwithstanding the above, if we do not deliver the appropriate disclosure statement to you at least 48 hours prior to you entering into any written or oral advisory contract with this us, then you have the right to terminate the contract without penalty within five (5) business days after entering into the contract.

### **OTHER EXPENSES AND FEES**

The fees discussed above include payment solely for our investment management, financial planning, retirement planning, and third-party manager monitoring services provided by us and are separate to certain fees or charges that are imposed by third parties in connection with investments made on your behalf for your account. Third-party fees may include markdowns, markups, brokerage commissions, other transaction costs and/or custodial fees.

Also, all fees paid to us are separate from the expenses charged by exchange-traded funds and mutual funds to their shareholders. Such fees and expenses will be used to pay management fees for the funds, other fund expenses, account administration, and a possible distribution fee. Exchanged traded funds and mutual funds can be invested in directly by you without our services. However, you would not receive our services to assist you in determining which products or services are most suitable for your financial situation and objectives. You should review both the fees we charge and the fees charged by the fund(s) to understand the total fees to be paid fully.

### **OTHER COMPENSATION**

John Koshy also a licensed insurance agent. In this capacity, he may recommend insurance, advisory, or other products, and receive normal insurance commissions if products are purchased through him in this capacity. Thus, a conflict of interest exists between the interests of this individual and those of the advisory clients, creating an incentive for him to recommend products based on the compensation received, rather than on a client's needs. However, clients are under no obligation to act upon any of these recommendations. Although our recommendations may include products offered by third parties, these recommendations are not limited to such products as all financial planning advice provided is of a generic nature. Clients have the option to purchase insurance products recommended by Mr. Koshy through other agents not affiliated with our firm. Please refer to Item 10 of this Brochure for a more detailed explanation of how our firm handles and mitigates these conflicts of interest.

## **ITEM 6**

### **Performance-Based Fees and Side-by-Side Management**

We do not charge any performance-based fees which are fees based on a share of capital gains on or capital appreciation of your assets.

## **ITEM 7**

### **Types of Clients**

We provide our investment advisory services to:

- Individuals
- High Net Worth Individuals
- Pension and profit-sharing plans
- Estates or charitable organizations
- Corporations

- Other business entities

Our minimum account size requirements for opening an account with us is \$250,000. This account minimum may be waived or negotiated on a case-by-case basis.

## ITEM 8

# Methods of Analysis, Investment Strategies, and Risk of Loss

## METHODS OF ANALYSIS

We use various methods of analysis and investment strategies including the following:

**Charting** - This is a type of technical analysis where we review various charts of market and security activity in an attempt to identify when the market is moving up or down and predicting how long trends may last and when that trends might reverse.

The risk in using charting as a method of analysis is that the patterns will not reoccur as expected. Additional risks regarding technical analysis in general are outlined below.

**Fundamental Analysis** – We evaluate economic and financial factors to determine if a security may be underpriced, overpriced or fairly priced. This method entails assessing a security by attempting to determine its intrinsic value by examining related financial, economic, and other qualitative and quantitative factors. Fundamental analysis requires an in-depth look at all factors that can affect the security's value, from macroeconomic factors (like the overall economy and industry conditions) to individually specific factors (like the financial situation and management of companies). The overall objective of performing the fundamental analysis is to determine a value that an investor can use to determine what sort of position to take with that security. This method of security analysis is contrary to technical analysis. Fundamental analysis involves using real data to evaluate a security's value. Although most analysts use fundamental analysis to value stocks, this method of valuation can be used for just about any type of security.

Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock. Therefore, unforeseen market conditions and/or company developments may result in significant price fluctuations that can lead to investor losses.

**Technical Analysis** – This method involves the evaluation of securities by performing an analysis of statical information that is generated by market activity, such as past prices and volume. Technical analysis does not attempt to measure a security's intrinsic value but instead, use charts and other tools to determine the patterns that can suggest future activity. Technical analysts believe that the historical performance of stocks and markets are indications of future performance.

A substantial risk in relying upon technical analysis is that spotting historical trends may not help to predict such trends in the future. Even if the trend will eventually reoccur, there is no guarantee that we will be able to accurately predict such a reoccurrence.

**Modern Portfolio Theory** - Modern portfolio theory (MPT) is a risk-averse theory that involves the construction of portfolios to maximize and optimize expected return based on a given level of market risk, emphasizing that risk is an inherent part of higher reward. According to the theory, it's possible to

construct an "efficient frontier" of optimal portfolios offering the maximum possible expected return for a given level of risk.

MPT tries to understand the market as a whole and measure market risk in an attempt to reduce the inherent risks of investing in the market. However, with every financial investment strategy there is a risk of a loss of principal. Not every investment decision will be profitable, and there can be no guarantee of any level of performance.

## INVESTMENT STRATEGIES

When formulating investment advice, we will use both long-term and short-term investment strategies. There are inherent risks associated with each of these strategies. A long-term strategy may not take advantage of short-term gains or may experience more volatility over the life of the portfolio. While a short-term strategy may incur more trading and brokerage costs and runs the risk that certain anticipated market movements do not occur resulting in the client holding a security for longer than intended.

## POTENTIAL RISKS

Investing involves different levels of risk that can result in loss of any profits and/or principal you have not realized. We manage your account in a manner consistent with your pre-determined risk tolerance and suitability profile. However, we cannot guarantee that our efforts will be successful. Investing in securities involves the risk of loss clients should be prepared to bear.

### **Investing involves the assumption of risk including:**

**Financial Risk:** which is the risk that the companies we recommend to you perform poorly, which affect the price of your investment.

**Market Risk:** which is the risk that the stock market will decline, decreasing the value of the securities we recommend to you with it.

**Inflation Risk:** which is the risk that the rate of price increases in the economy deteriorates the returns associated with the stock.

**Political and Governmental Risk:** which is the risk that the value of your investment will be affected by the introduction of new laws or regulations.

**Interest Rate Risk:** which is the risk that the value of the investments we recommend to you will fall if interest rates rise.

**Call Risk:** which is the risk that your investment will be called or purchased back from you when conditions are favorable to the bond issuer and unfavorable to you.

**Default Risk:** which is the risk that issuer is unable to pay the contractual interest or principal on the investment promptly or at all.

**Manager Risk:** which is the risk that an actively managed mutual fund's investment adviser will fail to execute the fund's stated investment strategy.

**Industry Risk:** which is the risk that a group of stocks in a single industry will decline in price due to adverse developments in that industry, decreasing the value of mutual funds that are significantly invested in that industry.

**ITEM 9**

## Disciplinary Information

As of the date of this brochure, we have not been subject to any disciplinary, legal, or regulatory events related to past or present investment clients. There has been no disciplinary, legal, or regulatory events related to us or any of our management persons.

**ITEM 10**

## Other Financial Activities and Affiliations

### FINANCIAL INDUSTRY ACTIVITIES

Neither Symphony nor its management persons are registered or has an application pending to register as a broker-dealer or a registered representative of a broker-dealer

Neither Symphony nor its management persons are registered or has an application pending to register as a futures commission merchant, commodity pool operator or commodity trading advisor.

### AFFILIATIONS

John Koshy, the sole owner and IAR of Symphony, is also an insurance agent licensed to sell insurance products. A conflict of interest exists in that these services pay a commission which conflicts with the IAR's fiduciary duties. Symphony does not require its IARs to encourage clients to implement investment advice through our insurance product recommendations. Clients have the right to implement insurance product recommendations through the insurance agency and agent of their choice. We require that all IARs disclose this conflict of interest when such recommendations are made. We also require IARs to disclose that the client has the right to purchase recommended products from individuals not affiliated with us.

### SELECTION OF OTHER INVESTMENT ADVISERS

We may recommend or select TPMMs for our clients and receive compensation from the third-party via a fee share; thus, a material conflict of interest exists between our interests, and those of our clients in that Symphony has an incentive to direct clients to TPMMs that provide us with a larger fee split. Symphony will always act in the best interest of our clients when making recommendations or selecting TPMMs. The client always has the right to decide whether to act on our recommendations and whether to utilize the services of the recommended TPMM. The client always has the right to utilize the professional of his or her choice. All TPMMs will be properly licensed and registered as investment advisers in the proper jurisdictions. The fees shared will not exceed any limit imposed by any regulatory agency.

**ITEM 11**

## Code of Ethics, Participation in Client Transactions and Personal Trading

### CODE OF ETHICS

Symphony has developed a code of ethics that will apply to all of our supervised persons. We and our IARs must act in a fiduciary capacity when providing investment advisory services to you. As a fiduciary, it is an investment adviser's responsibility to provide fair and full disclosure of all material facts and to act solely in the best interest of each of our clients at all times. Symphony has a fiduciary duty to all clients. This fiduciary duty is considered the core underlying principle of our code of ethics, which also covers our

insider trading, and personal securities transactions policies and procedures. We require all of our supervised persons to conduct business with the highest level of ethical standards and to comply with all federal and state securities laws at all times. Upon employment or affiliation and at least annually thereafter, all supervised persons will acknowledge that they have read, understand and agree to comply with our Code of Ethics.

Our Code of Ethics is available to clients and prospective clients upon request.

### **RECOMMENDATIONS INVOLVING A MATERIAL FINANCIAL INTEREST**

Neither we nor any related person recommend to clients, or buys or sells for clients' accounts, securities in which we or a related person has a material financial interest.

### **PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS**

There may be instances where an IAR will recommend to investment advisory clients or prospective clients the purchase or sale of securities in which an IAR, its affiliates or other clients may also have a position or interest. Certain affiliated accounts may trade in the same securities with client accounts on an aggregated basis. Generally, in such circumstances, the affiliated and client accounts will share execution costs equally. Completed trade orders will be allocated according to the instructions from the initial trade order. Partially filled trade orders will be allocated on a pro-rata basis. Any exceptions will be explained in the trade order.

### **PERSONAL TRADING**

Employees are permitted to have personal securities accounts as long as personal investing practices are in line with fiduciary standards and regulatory requirements, and do not conflict with their duty to Symphony and our clients. Symphony monitors and controls personal trading through pre-approval of all personal securities transactions or blackout periods imposed upon employees trading in the same securities as Symphony. We forbid any officer or employee, either personally or on behalf of others, to trade on material, nonpublic information or to communicate such information to others in violation of the law.

## **ITEM 12 Brokerage Practices**

We recommend broker/dealers for our clients to use in order to custody their accounts. The firms we recommend will be independent SEC-registered broker-dealers and members of FINRA and SIPC.

Symphony currently has arrangements with Charles Schwab Corporation, Fidelity Investments, SEI Investments Company, and Altruist. These are the unaffiliated qualified custodian whereby Symphony would suggest you custody your accounts. These are independent SEC-registered broker-dealers and members of FINRA and SIPC.

As a fiduciary, we are obligated to seek out the best execution of client transactions for accounts that we manage. In general, the execution of securities transactions is at a total cost to process each transaction and are the most favorable under the circumstances. However, we do not limit the best execution to the lowest available price. Additional factors are taken into consideration when determining the arrangement and services in the selection of a broker-dealer or qualified custodian. Our review consists of reviewing the commission and fee structures of various broker-dealers, research platforms, and execution services. Accordingly, while we consider competitive rates, we do not necessarily obtain the lowest possible

commission rates for account transactions. Therefore, the overall services provided by unaffiliated broker-dealers and qualified custodians are evaluated to determine the best execution. You can pay trade execution charges and higher commissions through the trading platforms approved by us than through platforms that have not been approved by us.

Symphony does not maintain custody of your assets that we manage, although we are deemed to have custody of your assets if you give us authority to withdraw assets from your account (see Item 15—Custody, below). Your assets must be maintained in an account at a “qualified custodian,” generally a broker-dealer or bank. We may recommend that our clients use Charles Schwab & Co., Inc. (“Schwab”), a registered broker-dealer, member SIPC, as the qualified custodian.

We are independently owned and operated and are not affiliated with Schwab. Schwab will hold your assets in a brokerage account and buy and sell securities when we instruct them to. While we recommend that you use Schwab as custodian/ broker, you will decide whether to do so and will open your account with Schwab by entering into an account agreement directly with them. Conflicts of interest associated with this arrangement are described below as well as in Item 14 (Client referrals and other compensation). You should consider these conflicts of interest when selecting your custodian.

We do not open the account for you, although we can assist you in doing so. Not all advisors require their clients to use a particular broker-dealer or other custodian selected by the advisor. Even though your account is maintained at Schwab, and we anticipate that most trades will be executed through Schwab, we can still use other brokers to execute trades for your account as described below (see “Your brokerage and custody costs”).

We recommend Schwab, a custodian/ broker, to hold your assets and execute transactions. When considering whether the terms that Schwab provides are, overall, most advantageous to you when compared with other available providers and their services, we take into account a wide range of factors, including:

- Combination of transaction execution services and asset custody services (generally without a separate fee for custody)
- Capability to execute, clear, and settle trades ( buy and sell securities for your account)
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
- Breadth of available investment products (stocks, bonds, mutual funds, exchange-traded funds (ETFs), etc.)
- Availability of investment research and tools that assist us in making investment decisions
- Quality of services
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices
- Reputation, financial strength, security and stability
- Prior service to us and our clients
- Services delivered or paid for by Schwab

- Availability of other products and services that benefit us, as discussed below (see “Products and services available to us from Schwab”)

### **Your brokerage and custody costs**

For our clients’ accounts that Schwab maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. Certain trades (for example, mutual funds and ETFs) do not incur Schwab commissions or transaction fees. Schwab is also compensated by earning interest on the uninvested cash in your account in Schwab’s Cash Features Program. For some accounts, Schwab charges you a percentage of the dollar amount of assets in the account in lieu of commissions. Schwab’s asset-based fees applicable to our client accounts were negotiated based on the condition that our clients collectively maintain a total of at least \$ of their assets in accounts at Schwab.] This commitment benefits you because the overall asset-based fees you pay are lower than they would be otherwise. In addition to asset-based fees, Schwab charges you a flat dollar amount as a “prime broker” or “trade away” fee for each trade that we have executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into your Schwab account. These fees are in addition to the commissions or other compensation you pay the executing broker-dealer. Because of this, in order to minimize your trading costs, we have Schwab execute most trades for your account.

We are not required to select the broker or dealer that charges the lowest transaction cost, even if that broker provides execution quality comparable to other brokers or dealers. Although we are not required to execute all trades through Schwab, we have determined that having Schwab execute most trades is consistent with our duty to seek “best execution” of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above (see “How we select brokers/custodians”). By using another broker or dealer you can pay lower transaction costs.

## **RESEARCH AND OTHER SOFT DOLLAR BENEFITS**

### **Products & Services Available to Us from Schwab**

Schwab Advisor Services (formerly called Schwab Institutional) is Schwab’s business serving independent investment advisory firms like ours. They provide us and our clients with access to its institutional brokerage – trading, custody, reporting, and related services – many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer our clients’ accounts, while others help us manage and grow our business. Schwab’s support services are generally available on an unsolicited basis and at no charge to us as long as we maintain a total of at least \$10 million of our clients’ assets in accounts at Schwab.

### **Services that Benefit Client**

Schwab’s institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access, or that would require a significantly higher minimum initial investment by our clients. Schwab’s services described in this paragraph generally benefit clients or their account(s).

### **Services that May Not Directly Benefit Clients**

Schwab also makes available to us other products and services that benefit us but may not directly benefit the client or their account(s). These products and services assist us in managing and administering our

clients' accounts. They include investment research, both Schwab's own and that of third parties. We may use this research to service all or some substantial number of our clients' accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:

- provides access to client account data (such as duplicate trade confirmations and account statements);
- facilitates trade execution and allocate aggregated trade orders for multiple client accounts;
- provides pricing and other market data;
- facilitates payment of our fees from our clients' accounts; and
- assists with back-office functions, recordkeeping, and client reporting.

Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:

- educational conferences and events
- technology, compliance, legal, and business consulting;
- publications and conferences on practice management and business succession; and
- access to employee benefits providers, human capital consultants, and insurance providers.

Schwab may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab may also discount or waive its fees for some of these services or pay all or a part of a third party's fees.

Irrespective of direct or indirect benefits to our client through Schwab, we strive to enhance the client's experience, help reach their goals and put their interests before that of our firm or its associated persons.

## **BROKERAGE FOR CLIENT REFERRALS**

We do not receive client referrals from broker-dealers.

## **DIRECTED BROKERAGE**

Clients will be permitted to select any broker-dealer of their choosing. In these situations, we may be unable to achieve most favorable execution for client transactions. Directing brokerage may cost clients more money in that the client may pay higher brokerage commissions because we may not be able to aggregate orders to reduce transaction costs, or the client may receive less favorable prices.

## **TRADE AGGREGATION**

We attempt to allocate trade executions in the most equitable manner possible, taking into consideration current asset allocation and availability of funds using price averaging, proration and consistently non-arbitrary methods of allocation. We may aggregate orders in order to obtain best execution, to negotiate more favorable commission rates or to allocate equitably among our clients' differences in prices and commission or other transaction costs. In aggregated orders, transactions will be price-averaged and

allocated among our clients in proportion to the purchase and sale orders placed for each client account on any given day

## ITEM 13

# Review of Accounts

### PERIODIC REVIEWS

We review investment management accounts no less than annually. These accounts will be reviewed by John Koshy. Accounts are reviewed to evaluate asset allocation, investment strategy and objectives, cash balance, and performance as well as the general economic outlook and current investment trends.

Financial plans will be reviewed quarterly by John Koshy.

We review TPMM and retirement plan client accounts as frequently as needed by the client's situation but no less than quarterly. These accounts will be reviewed by John Koshy. Accounts are reviewed to evaluate asset allocation, investment strategy and objectives, cash balance, and performance as well as the general economic outlook and current investment trends.

### REVIEW TRIGGERS

We conduct periodic reviews to evaluate current market, economic and political events and how these may affect client accounts. Additional reviews may be triggered by these events or by events in the client's financial or personal status.

### REGULAR REPORTS

Investment management clients will receive advisory account reports no less than quarterly. These reports show asset value by cash balances, security, unit cost, total cost, current per share values, etc. Clients are urged to review the quarterly reports provided by us with those provided by their custodian and notify us of any differences. Clients are encouraged to phone or email us as often as they deem necessary to receive information regarding the investment tactics and strategies being followed.

Financial planning and consulting clients are provided a one-time written financial plan concerning their financial situation. After the presentation of the plan, there are ongoing status reports throughout the year.

Retirement plan clients may create and/or review the plan's Investment Policy Statement ("IPS"). The plan client may also receive quarterly written reports evaluating the performance of the plan's investments as well as comparing the performance thereof to benchmarks set forth in the IPS or as otherwise determined in the judgment of Symphony. The information used to generate the reports will be derived from statements provided by the plan fiduciary or third party. This review will include a quantitative and qualitative analysis of investment selections included within the plan and provide third-party commentary on investment options whenever available.

TPMM clients will receive their advisory account reports from the TPMM and their custodian no less than quarterly. These reports show asset value by cash balances, security, unit cost, total cost, current per share values, etc. Clients are urged to review the quarterly reports provided by the TPMM with those provided by their custodian and notify us of any differences. Clients are encouraged to phone or email us

as often as they deem necessary to receive information regarding the investment tactics and strategies being followed.

#### ITEM 14

### Client Referrals and Other Compensation

We receive an economic benefit from Schwab in the form of the support products and services it makes available to us and other independent investment advisors whose clients maintain their accounts at Schwab. In addition, Schwab has also agreed to pay for certain products and services for which we would otherwise have to pay once the value of our clients' assets in accounts at Schwab reaches a certain size. [In some cases, a recipient of such payments is an affiliate of ours or another party which has some pecuniary, financial or other interests in us (or in which we have such an interest). You do not pay more for assets maintained at Schwab as a result of these arrangements. However, we benefit from the arrangement because the cost of these services would otherwise be borne directly by us. You should consider these conflicts of interest when selecting a custodian. The products and services provided by Schwab, how they benefit us, and the related conflicts of interest are described above (see Item 12 – Brokerage Practices).

We do not engage in referral relationships with third-party solicitors.

We may receive compensation based on the service they provide to our clients. Any such compensation arrangement will be formalized in an agreement and disclosed to our clients.

#### ITEM 15

### Custody

Under government regulations, we are deemed to have custody of your assets if, for example, you authorize us to instruct Schwab to deduct our advisory fees directly from your account [or if you grant us authority to move your money to another person's account]. Schwab maintains actual custody of your assets. You will receive account statements directly from Schwab at least quarterly. They will be sent to the email or postal mailing address you provided to Schwab. You should carefully review those statements promptly when you receive them. We also urge you to compare Schwab's account statements with the periodic account statements and/or portfolio reports you will receive from us.

#### ITEM 16

### Investment Discretion

If you are participating in our investment management services, upon receiving your written authorization via our executed investment advisory agreement, we will maintain trading authorization over your designated account and may also implement trades on a discretionary basis.

When discretionary authority is granted, we will have the limited authority to determine the type of securities to be purchased, sold or exchanged and a number of securities that can be bought, sold or exchanged for your portfolio without obtaining your consent for each transaction.

If you do not grant this limited investment discretion, your IAR will be required to contact you and get affirmation regarding our investment recommendations such as the security being recommended, the number of shares, whether the security should be bought or sold before implementing changes in your account.

Once the above factors are agreed upon, we will be responsible for making decisions regarding the timing of buying or selling an investment and the price at which the investment is bought or sold. If your accounts are managed on a non-discretionary basis, it is critical that you respond promptly. If we do not receive a

response to our request immediately, the timing of trade implementation may lead to an adverse impact where we may not achieve the optimal trading price.

On a case by case basis, you may place reasonable restrictions on the types of investments that may be purchased or sold in your account so long as the restrictions are explicitly set forth or included as an attachment to the investment advisory agreement

## ITEM 17

### Voting Client Securities

We do not have the authority to vote proxies as it pertains to the issuers of securities held in your account. The responsibility for voting your securities places increased liability to us and does not add enough value to the services provided to you to justify the additional compliance and regulatory costs associated with voting your securities.

Therefore, you are responsible for voting all proxies for securities held in accounts managed by us. Typically, our qualified custodian will forward you your proxy information. Although we do not vote your proxies, you can contact us if you have a question about a particular proxy.

## ITEM 18

### Financial Information

We are not required to include a balance sheet for our most recent fiscal year. We are not subject to a financial condition that is reasonably likely to impair our ability to meet contractual commitments to our clients.

We are currently not in, nor have been historically in a financially precarious situation or the subject of a bankruptcy petition.

## ITEM 19

### Requirements for State-Registered Advisers

#### EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE OF PRINCIPAL OFFICERS

Please see the brochure supplement supplied as Part 2B.

#### OTHER BUSINESS ACTIVITIES OF PRINCIPAL OFFICER

Please see the brochure supplement supplied as Part 2B.

#### PERFORMANCE-BASED FEES

Symphony's IARs do not currently charge any performance-based fees (fees based on a share of capital gains or capital appreciation of the assets of a client).

#### DISCIPLINARY INFORMATION

Symphony's IARs are not subject to any arbitration claim or found liable in a civil, self-regulatory, or administrative proceeding.

#### MATERIAL RELATIONSHIPS WITH ISSUERS OF SECURITIES

Neither Symphony nor its IARs have any relationship or arrangement with issuers of securities.



**S Y M P H O N Y**  
Retirement Partners, LLC

**John Koshy**  
**CRD#1848801**

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**Form ADV Part 2B  
Firm Brochure  
Supplement  
March 25, 2026**

This Brochure Supplement provides information for John Koshy that supplements the Symphony Retirement Partners LLC brochure. You should have received a copy of that brochure. Please contact us at (512) 337-8060 or [jkoshy@symphonyretirement.com](mailto:jkoshy@symphonyretirement.com) if you did not receive Symphony's Brochure or if you have any questions about the contents of this supplement.

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

## ITEM 2

# Educational Background and Business Experience

John Koshy, born in India, graduated from St. Xavier's College in 1983 with a Bachelor's Degree in Commerce. John Koshy's employment information is listed below.

Symphony Retirement Partners LLC, Managing Partner	January 2019 to Present
Lincoln Financial Advisors, Registered Representative	November 2004 to April 2019

## PROFESSIONAL DESIGNATIONS

### **Accredited Investment Fiduciary™, AIF®**

The AIF designation is awarded by fi360 demonstrates the focus on all the components of a comprehensive investment process, related fiduciary standards of care, and commitment to excellence. AIF designees undergo an initial training program, annual continuing education, and pledge to abide by the designation's code of ethics. Since October 2002, the Accredited Investment Fiduciary® (AIF®) designation has been the mark of commitment to a standard of investment fiduciary excellence. Those who earn the AIF mark successfully complete a specialized program on investment fiduciary standards of care and subsequently passed a comprehensive examination. AIF designees demonstrate a thorough understanding of fi360's Prudent Practices for investment advisors and stewards.

Upon successful completion of the program, participants are able to:

- Articulate the basis for, and benefits of, fiduciary standards of excellence.
- Identify when an individual or organization may be deemed to have fiduciary status.
- Identify the legal standards that require fiduciaries to prudently manage investment decisions
- Apply the Practices that define a prudent investment process for Investment Stewards and Advisors and recognize the Practices for Investment Managers.
- Strengthen own or clients' fiduciary policies and procedures.
- Become an Accredited Investment Fiduciary Minimum Designation Requirements Issuing Organization: Center for Fiduciary Studies

Prerequisites/Experience Required: Must meet a point-based threshold based on a combination of education, relevant industry experience and/or profession development

Educational Requirements: Must complete a web-based program and capstone program

Examination Type: Final certification exam, proctored closed book Continuing Education/Experience Requirements: 6 hours per year

### **Chartered Retirement Plans Specialist™, CRPS®**

Individuals who hold the CRPS® designation have completed a course of study encompassing design, installation, maintenance and administration of retirement plans.

Individuals who hold the CRPS® designation must adhere to the following requirements:

Education: Complete a course of study encompassing design, installation, maintenance and administration of retirement plans.

Examination Type: Individuals must pass an end-of-course examination that tests their ability to synthesize complex concepts and apply theoretical concepts to real-life situations.

Ethics: All designees have agreed to adhere to Standards of Professional Conduct and are subject to a disciplinary process.

Continuing Education: Designees renew their designation every two-years by completing 16 hours of continuing education, reaffirming adherence to the Standards of Professional Conduct and complying with self-disclosure requirements.

### **Certified Long Term Care®, CLTC®**

The Certified Long Term Care CLTC® is a non-accredited voluntary certification offered by the CLTC Board of Standards, Inc. Designation holders are required to serve clients with the highest level of professionalism.

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

- Education – Either a two day class or online course;
- Examination – Pass Final Course Examination;

Individuals who become certified must complete one course every two years in order to maintain the right to continue to use the CLTC® marks.

## **ITEM 3**

### **Disciplinary Information**

John Koshy has not been and/or is presently not involved in any disciplinary, legal, or regulatory events that would be material to a client's evaluation of him or of Symphony.

## **ITEM 4**

### **Other Business Activities**

John Koshy is also an insurance agent licensed to sell insurance products. A conflict of interest exists because these services pay a commission, which conflicts with the IAR's fiduciary duties. Symphony does not require its IARs to encourage clients to implement investment advice through our insurance product recommendations. Clients have the right to implement insurance product recommendations through the insurance agency and agent of their choice. We require that all IARs disclose this conflict of interest when such recommendations are made. We also require IARs to disclose that the client has the right to purchase recommended products from individuals not affiliated with us.

## **ITEM 5**

### **Additional Compensation**

John Koshy does not receive any additional compensation.

**ITEM 6****Supervision**

John Koshy, Managing Partner and Chief Compliance Officer of Symphony, is responsible for supervising the investment advisory activities of Symphony as well as monitoring and reviewing all forms of written communication provided to clients. John Koshy can be contacted via telephone at (512) 337-8060 and via email at [jkoshy@symphonyretirement.com](mailto:jkoshy@symphonyretirement.com).

**ITEM 7****Requirements for State-Registered Advisers**

A. John Koshy has not been involved in an award or found liable in any arbitration claim or in any civil, self-regulatory organization or administrative proceedings.

B. John Koshy has not been the subject of a bankruptcy petition.



## SYMPHONY

Retirement Partners, LLC

### Privacy Policy

Symphony Retirement Partners LLC (“Symphony”) is an investment advisory firm registered with the States of Texas and New York that provides investment advisory services and operates [www.symphonyretirement.com](http://www.symphonyretirement.com), which describes our services.

This document is intended to inform prospective clients and website visitors of our policies concerning the collection, use, sharing, and disclosure of Personal Information of anyone using our services.

By using our services, you agree to the collection and use of information by the terms of this policy. The Personal Information collected by the firm is used to assist Symphony in providing investment advisory services. The firm will not use or share your information with anyone except as described in this Privacy Policy.

When you are no longer our client, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.

The terms used in this Privacy Policy have the same meanings as in our Terms and Conditions, which is accessible at [www.symphonyretirement.com](http://www.symphonyretirement.com) unless otherwise defined in this Privacy Policy.

Symphony Retirement Partners LLC deploys appropriate computer safeguards and secures all files and buildings to protect your personal information from unauthorized access and use.

### Information Collection and Use

Symphony may require you to provide the firm with certain personally identifiable information including, but not limited to, your name, phone number, and postal address. This information is used to contact or identify you.

For business purposes— such as to process your transactions, maintain your account(s), or respond to court orders and legal investigations, the firm may collect, track, and share Social Security numbers, Tax ID’s, income, account balances, and credit information.

The federal government and some states allow you to limit this collection and sharing. Such limits may prevent our providing necessary services. For more information, or to limit information sharing, contact us at the phone number or email address listed below for more information.

### Log Data

When you visit our company website, the firm will collect information that your browser sends to us called Log Data. This Log Data may include information such as your computer’s Internet Protocol (IP) address, browser version, pages of our Service that you visit, the time and date of your visit, the time spent on those pages, and other statistics.

### Cookies

Cookies are files with small amount of data that are commonly used as a unique, anonymous identifier. These are sent to your browser from the website that you visit and are stored on your computer’s hard drive.

Symphony’s website uses these “cookies” to collect information and to improve our Service. You have the option to either accept or refuse these cookies and know when a cookie is being sent to your computer. If you choose to refuse these cookies, you may not be able to use some portions of the firm’s website services.

## Third-Parties

Symphony may share information with third-party companies and individuals due to the following reasons:

- To facilitate our investment advisory services;
- To provide the investment advisory services on our behalf;
- To perform operational-related services; or
- To assist us in analyzing how our investment advisory services are used.
- Pursuant to law, rules, regulations, standard security industry practices, in connection with a subpoena, discovery request, or other legal/regulatory process compelling the sharing of information.

These third parties will have access to your Personal Information to perform the tasks assigned to them on our behalf. They are not allowed to disclose or use the information for any other purpose.

## Links to Other Sites

Our website may contain links to other sites that are not operated by us. If you click on a third-party link, you will be directed to that site. Symphony strongly advises you to review the Privacy Policy of these websites, as we have no control over and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services.

## Changes to This Privacy Policy

Symphony may update our Privacy Policy at any time, and we advise you to review the website periodically for any changes. The firm will notify you of any changes by posting the new Privacy Policy on the website. All changes are effective immediately after they are posted on the web page.

## Contact Us

If you have any questions or suggestions about our Privacy Policy, please feel free to contact us at by phone at (512) 337-8060 or by email at [jkoshy@symphonyretirement.com](mailto:jkoshy@symphonyretirement.com).