

Firm Brochure

(Part 2A of Form ADV)

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This brochure provides information about the qualifications and business practices of Robbins Wealth Management (ADVISOR). If you have any questions about the contents of this brochure, please contact us at: 814-838-4185, or by email at: info@investrwm.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.

Additional information about Robbins Wealth Management is available on the SEC's website at www.adviserinfo.sec.gov

August 23, 2011

Material Changes

Annual Update

The Material Changes section of this brochure will be updated annually when material changes occur since the previous release of the Firm Brochure.

Material Changes since the Last Update

Soft Dollar information added on pages 10-12. Other compensation information added on page 16.

Full Brochure Available

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: 814-838-4185 or by email at: info@investrwm.com.

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Advisory Business

Firm Description

Robbins Wealth Management was founded in 1990.

Robbins Wealth Management (ADVISOR) provides personalized investment management to individuals, pension and profit sharing plans, trusts, estates, charitable organizations and small businesses. Advice is provided through consultation with the client and may include: determination of financial objectives, identification of financial problems, cash flow management, tax planning, insurance review, investment management, education funding, retirement planning, estate analysis and assistance in implementing an estate plan.

ADVISOR is strictly a fee-only investment management firm. The firm does not sell annuities, insurance, stocks, bonds, mutual funds, limited partnerships, or other commissioned products. James H. Robbins is a licensed insurance agent and therefore is able to sell commissioned based insurance products. However, he does not actively engage in selling commission products unless specifically requested by a client. Other than this, the firm is not affiliated with entities that sell financial products or securities. The only commissions accepted are from the above referenced insurance related products and the client is aware prior to entering the transaction. Other than this, no commissions in any form are accepted. No finder's fees are accepted.

ADVISOR advises clients regarding cash flow, college planning, retirement planning, tax planning and estate planning.

Investment advice is provided, with the client making the final decision on investment selection (non-discretionary asset management). ADVISOR does not act as a custodian of client assets. The client always maintains asset control. ADVISOR places trades for clients under a limited power of attorney.

A written evaluation of each client's initial situation is provided to the client. Periodic reviews are also communicated to provide reminders of the specific courses of action that need to be taken. More frequent portfolio reviews may occur depending upon matters affecting specific securities and the various strategies employed for a given client. No changes take place in the portfolio until such time as the client approves said change.

Other professionals (e.g., lawyers, accountants, insurance agents, etc.) are engaged directly by the client on an as-needed basis. Conflicts of interest will be disclosed to the client in the unlikely event they should occur.

The initial meeting, which may be by telephone, is free of charge and is considered an exploratory interview to determine the extent to which investment management may be beneficial to the client.

Principal Owners

James H. & Janice K. Robbins are 100% stockholders.

Types of Advisory Services

ADVISOR provides investment supervisory services, also known as asset management services and furnishes investment advice through consultations.

Occasionally, ADVISOR furnishes advice to clients on matters not involving securities, taxation issues, and trust services that often include estate planning.

ADVISOR does not provide market timing services. We do attempt to place transactions at opportune times, but we make no express declaration of attempting to time the market.

As of March 7, 2011 Robbins Wealth Management manages approximately \$99,800,000 in assets for approximately 197 clients. All of these assets are managed on a non-discretionary basis.

ADDITIONAL SERVICES

- The Firm participates in AdvisorDirect, a referral program established by TD Ameritrade, an independent broker-dealer;
- TD Ameritrade and the Firm are separate and unaffiliated;
- The Firm pays fees, not to exceed 25% of the advisory fee that the client pays to the Firm, to TD Ameritrade in connection with successful referrals made through AdvisorDirect;
- The Firm will also pay TD Ameritrade the Solicitation Fee on any advisory fees received by the Firm from any of a referred client's family members, including a spouse, child or any other family member who resides with the referred client and hired the Firm on the recommendation of such referred client;
- Conflicts of interest may arise from the Firm's participation in this referral program;
- The Firm will not charge any fees or costs higher than the Firm's standard fee schedule offered to other advisory clients or otherwise pass referral fees paid to TD Ameritrade to its clients;
- The Firm's duty of "best execution" is not eliminated by its participation in the program;
- The Firm and TD Ameritrade are independent of one another and have neither an agency nor employment relationship;

- In addition to meeting the minimum eligibility criteria for participation in AdvisorDirect, the Firm may have been selected based on the amount and profitability to TD Ameritrade of the assets in, and trades placed for, the Firm's client accounts maintained at TD Ameritrade; and

The Firm has agreed not to solicit clients referred through AdvisorDirect to transfer their brokerage accounts from TD Ameritrade or establish brokerage or custody accounts at other custodians other than when its fiduciary duties require it to recommend other broker-dealers or custodians

Tailored Relationships

The goals and objectives for each client are documented through an internal questionnaire and a proven risk tolerance service. Investment Policy Statements are created that reflect the client's stated goals and objective. Clients may impose restrictions on investing in certain securities or types of securities.

Agreements may not be assigned without client consent.

Types of Agreements

The following agreements define the typical client relationships.

Investment Management Agreement

Most clients choose to have Robbins Wealth Management manage their assets in order to obtain ongoing in-depth advice and life planning. All aspects of the client's financial affairs are reviewed. Realistic and measurable goals are set and objectives to reach those goals are defined. As goals and objectives change over time, suggestions are made and implemented on an ongoing basis.

The scope of work and fee for an Investment Management Agreement is provided to the client in writing prior to the start of the relationship. An Advisory Service Agreement includes: cash flow management; investment management (including performance reporting); education planning; retirement planning; as well as the implementation of recommendations within each area.

Although the Investment Management Agreement is an ongoing agreement, the length of service to the client is at the client's discretion. Either the client or the investment manager may terminate an Agreement by written notice to the other party. At termination, fees will be billed on a pro rata basis for the portion of the quarter completed. The portfolio value at the completion of the prior full billing quarter is used as the basis for fee computation unless a

termination is involved in which case the portfolio value on the effective date of termination is used as the basis for fee computation.

Hourly Planning Engagements

ADVISOR provides hourly planning services for clients who need advice on a limited scope of work. The hourly rate for limited scope engagements is \$200.00. This option is not available for investment advice but is used for tax planning, estate planning, or similar services.

Asset Management

Assets are invested primarily in individual equities, individual fixed income, no-load mutual funds, cash secured put options, covered call options, and exchange-traded funds, usually through TD Ameritrade. Fund companies charge each fund shareholder an investment management fee that is disclosed in the fund prospectus. Discount brokerages may charge a transaction fee for the purchase of certain mutual funds, for equity, for fixed income, and/or for options transactions.

ADVISOR does not receive any compensation, in any form, from fund companies or for trade volume placed at TD Ameritrade.

Investments may also include: equities (stocks), warrants, corporate debt securities, commercial paper, certificates of deposit, municipal securities, investment company securities (variable life insurance, variable annuities, and mutual funds shares), U. S. government securities, options contracts, futures contracts, and interests in partnerships.

Initial public offerings (IPOs) are only available to the extent that TD Ameritrade enables such access.

Termination of Agreement

A Client may terminate any of the aforementioned agreements at any time by notifying ADVISOR in writing and paying the rate for the time spent on the investment advisory engagement prior to notification of termination.

ADVISOR may terminate any of the aforementioned agreements at any time by notifying the client in writing.

Fees and Compensation

Description

ADVISOR bases its fees on a percentage of assets under management subject to an annual minimum charge.

Fee Billing

Investment management fees are billed quarterly, in arrears, meaning that we invoice you after the three-month billing period has ended. Payment in full is expected upon invoice presentation. However, fees are typically deducted directly from a client's account held at TD Ameritrade to facilitate billing. The client must consent in advance to direct debiting of their investment account.

The annual fee for investment management services is based on a percentage of the investable assets according to the following schedule:

- 1.00% on the first \$1,000,000;
- 0.80% on the next \$1,000,000 (from 1,000,001 to 2,000,000);
- 0.70% on the next \$1,000,000 (from 2,000,001 to 3,000,000); and
- 0.60% on the assets above \$3,000,000

The minimum annual fee is \$ 3,000.00. Current client relationships may exist where the fees are higher or lower than the fee schedule above. Legacy clients of ADVISOR may operate under a different fee schedule depending upon the prevailing fee schedule at the time they became a client and subject to approval by an officer of the company.

These fees are negotiable only on rare occasions. If ADVISOR prepares a client's tax return, then additional fees will apply.

Other Fees

Custodians may charge transaction fees on purchases or sales of certain mutual funds, exchange-traded funds, equities, fixed income issues, and/or options contracts. These transaction charges are usually small and incidental to the purchase or sale of a security. The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security.

Expense Ratios

Mutual funds generally charge a management fee for their services as investment managers. The management fee is called an expense ratio. For example, an expense ratio of 0.50 means that the mutual fund company charges 0.5% for their services. These fees are in addition to the fees paid by you to Robbins Wealth Management

Performance figures quoted by mutual fund companies in various publications are after their fees have been deducted.

Past Due Accounts and Termination of Agreement

ADVISOR reserves the right to stop work on any account that is more than 90 days overdue. In addition, ADVISOR reserves the right to terminate any investment management engagement where a client has willfully concealed or has refused to provide pertinent information about financial situations when necessary and appropriate, in ADVISOR's judgment, to providing proper financial advice.

Performance-Based Fees

Sharing of Capital Gains

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

ADVISOR does not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

Types of Clients

Description

ADVISOR generally provides investment advice to individuals, profit sharing plans, trusts, or estates.

Client relationships vary in scope and are usually long-term in nature.

Account Minimums

The minimum account size is \$400,000.00 of assets under management, when options strategies are employed. This equates to an annual fee of \$4,000.00.

When an account falls below \$300,000 in value, the minimum annual fee of \$3,000.00 is charged.

Under normal circumstances the account minimum is \$250,000. ADVISOR has the discretion to waive this account minimum. Accounts of less than \$300,000 may be set up with the understanding that the minimum annual fee is \$3,000.00. Other exceptions may apply to employees of ADVISOR and their relatives, or relatives of existing clients subject to approval by an officer of the company. Legacy clients of ADVISOR who do not meet current account minimums are permitted to remain clients of the firm subject to approval by an officer of the company.

Clients receiving ongoing asset management services will be assessed a \$3,000 minimum annual fee. Clients with assets below the minimum account

size may pay a higher percentage rate on their annual fees than the fees paid by clients with greater assets under management.

Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis

Security analysis methods may include charting, fundamental analysis, technical analysis, and cyclical analysis.

The main sources of information include financial newspapers and magazines, inspections of corporate activities, research materials prepared by others, corporate rating services, annual reports, prospectuses, filings with the Securities and Exchange Commission, and company press releases.

Other sources of information that ADVISOR may use include Morningstar Principia mutual fund information, Morningstar Principia stock information, independent reports made available by TD Ameritrade, and the Internet.

Investment Strategies

The primary investment strategy used on client accounts is strategic asset allocation. ADVISOR often uses a group of mutual funds to create a diversified base and then tactically extend into individual equities, individual fixed income, and customized options strategies. Certain clients prefer to exclude mutual funds and instead select only individual positions. Portfolios are globally diversified to adjust for the risk associated with domestic markets.

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time. Each client executes an Investment Policy Statement that documents their objectives and their desired investment strategy.

Other specific strategies may include long-term purchases, short-term purchases, trading, short sales, margin transactions, and option writing.

Risk of Loss

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular

underlying circumstances. For example, political, economic and social conditions may trigger market events.

- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

Disciplinary Information

Legal and Disciplinary

The firm and its employees have not been involved in legal or disciplinary events related to past or present investment clients.

Other Financial Industry Activities and Affiliations

Financial Industry Activities

ADVISOR is not registered as a securities broker-dealer, or a futures commission merchant, commodity pool operator or commodity trading advisor.

Affiliations

ADVISOR does not have arrangements that are material to its advisory or its clients with a related person who is a broker-dealer, investment company, other investment advisor, financial planning firm, commodity pool operator, commodity trading adviser or futures commission merchant, banking or thrift institution, accounting firm, law firm, insurance company or agency, pension consultant, real estate broker or dealer, or an entity that creates or packages limited partnerships.

Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Code of Ethics

The employees of ADVISOR have committed to a Code of Ethics that is available for review by clients and prospective clients upon request. The firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

Participation or Interest in Client Transactions

Robbins Wealth Management and its employees may buy or sell securities that are also held by clients. Employees may not trade their own securities ahead of client trades. Employees comply with the provisions of the Robbins Wealth Management *Compliance Manual*.

Personal Trading

The Chief Compliance Officer of Robbins Wealth Management is James H. Robbins. He reviews all employee trades each quarter. His trades are reviewed by Eric J. Robbins. The personal trading reviews ensure that the personal trading of employees does not affect the markets, and that clients of the firm receive preferential treatment. Since most employee trades are small mutual fund trades or exchange-traded fund trades, the trades do not affect the securities markets.

Brokerage Practices

Selecting Brokerage Firms

ADVISOR does not have any affiliation with product sales firms. Specific custodian recommendations are made to Clients based on their need for such services. ADVISOR recommends custodians based on the proven integrity and financial responsibility of the firm and the best execution of orders at reasonable commission rates.

ADVISOR recommends discount brokerage firms and trust companies (qualified custodians), such as TD Ameritrade. Robbins Wealth Management is an advisor with TD Ameritrade.

Robbins Wealth Management does not receive fees or commissions from any of these arrangements.

ADVISOR participates in the institutional advisor program (the "Program") offered by TD Ameritrade Institutional. TD Ameritrade Institutional is a division of TD Ameritrade Inc., member FINRA/SIPC/NFA ("TD Ameritrade"), an unaffiliated SEC-registered broker-dealer and FINRA member. TD Ameritrade offers to independent investment advisors services which include custody of securities, trade execution, clearance and settlement of transactions. Advisor receives some benefits from TD Ameritrade through its participation in the Program. (Please see the disclosure under **Client Referrals and Other Compensation** on Page 12 below.)

Best Execution

ADVISOR reviews the execution of trades at TD Ameritrade each quarter. The review is documented. Trading fees charged by the custodian is also reviewed on a quarterly basis. ADVISOR does not receive any portion of the trading fees.

Soft Dollars

Generally, in addition to a broker's ability to provide "best execution," we may also consider the value of "research" or additional brokerage products and services a broker-dealer has provided or may be willing to provide. This is known as paying for those services or products with "soft dollars." Because many of the services or products could be considered to provide a benefit to the firm, and because the "soft dollars" used to acquire them are client assets, the firm could be considered to have a conflict of interest in allocating client brokerage business: it could receive valuable benefits by selecting a particular broker or dealer to execute client transactions and the transaction compensation charged by that broker or dealer might not be the lowest compensation the firm might otherwise be able to negotiate. In addition, the firm could have an incentive to cause clients to engage in more securities transactions than would otherwise be optimal in order to generate brokerage compensation with which to acquire products and services.

The firm's use of soft dollars is intended to comply with the requirements of Section 28(e) of the Securities Exchange Act of 1934. Section 28(e) provides a "safe harbor" for investment managers who use commissions or transaction fees paid by their advised accounts to obtain investment research services that provide lawful and appropriate assistance to the manager in performing investment decision-making responsibilities. As required by Section 28(e), the firm will make a good faith determination that the amount of commission or other fees paid is reasonable in relation to the value of the brokerage and

research services provided. That is, before placing orders with a particular broker, we generally determine, considering all the factors described below, that the compensation to be paid to TD Ameritrade is reasonable in relation to the value of all the brokerage and research products and services provided by TD Ameritrade. In making this determination, we typically consider not only the particular transaction or transactions, and not only the value of brokerage and research services and products to a particular client, but also the value of those services and products in our performance of our overall responsibilities to all of our clients. In some cases, the commissions or other transaction fees charged by a particular brokerdealer for a particular transaction or set of transactions may be greater than the amounts another brokerdealer who did not provide research services or products might charge.

Research and Brokerage Products and Services. "Research" products and services we may receive from broker-dealers may include economic surveys, data, and analyses; financial publications; recommendations or other information about particular companies and industries (through research reports and otherwise); and other products or services (e.g., computer services and equipment, including hardware, software, and data bases) that provide lawful and appropriate assistance to the firm in the performance of its investment decision-making responsibilities. Consistent with Section 28(e), brokerage products and services (beyond traditional execution services) consist primarily of computer services and execution. We generally use such products and services in the conduct of our investment decision making generally, not just for those accounts whose commissions may be considered to have been used to pay for the products or services.

Other Uses and Products. The firm may use some products or services not only as "research" and as brokerage (i.e., to assist in making investment decisions for clients or to perform functions incidental to transaction execution) but for our administrative and other purposes as well. In these instances, we make a reasonable allocation of the cost of the products and services so that only the portion of the cost that is attributable making investment decisions and executing transactions is paid with commission dollars and we bear the cost of the balance. Our interest in making such an allocation differs from clients' interest, in that we have an incentive to designate as much as possible of the cost as research and brokerage in order to minimize the portion that the firm must pay directly.

Mutual Fund Transactions. Although shares of no-load mutual funds can be purchased and redeemed without payment of transactions fees, we may, consistent with our duty of best execution, determine to cause client accounts to pay transaction fees that may be higher than those obtainable from other brokerdealers when purchasing shares of certain no-load mutual funds through TD Ameritrade in order to obtain "research". This research may not

be used for the exclusive benefit of the clients who pay transaction fees in purchasing mutual fund shares.

Amount and Manner of Payment. A broker-dealer through which the firm wishes to use soft dollars may establish "credits" arising out of brokerage business done in the past, which may be used to pay, or reimburse the firm for, specified expenses. In other cases, a broker-dealer may provide or pay for the service or product and suggest a level of future business that would fully compensate it. The actual level of transactional business the firm does with a particular broker-dealer during any period may be less than such a suggested level, but may exceed that level and may generate unused soft dollar "credits." We do not exclude a broker-dealer from receiving business simply because the broker-dealer has not been identified as providing soft dollar research products and services, although we may not be willing to pay the same commission to such broker-dealer as we would have paid had the broker-dealer provided such products and services.

Order Aggregation

Trades are only aggregated in select circumstances, such as for a client who holds a security in multiple accounts or when multiple clients has all expressed an interest to either purchase or sell a security at the same time.

Review of Accounts

Periodic Reviews

Account reviews are performed on the following schedule by advisors from ADVISOR. Partial reviews are conducted more frequently when options strategies or market conditions dictate.

Assets Under Management in excess of \$600,000 receive reviews 4 times per year. Assets Under Management between \$450,000 - \$600,000 receive reviews 3 times per year. Assets Under Management between \$300,000 - \$450,000 receive reviews 2 times per year. Assets Under Management of \$300,000 or less receive reviews 1 time per year.

Review Triggers

Other conditions that may trigger a review are changes in the tax laws, new investment information, and changes in a client's own situation, options expiration, new and systemic information on a security owned, other options related reasons.

Regular Reports

Account reviewers are members of the firm's Investment Committee. They are instructed to consider the client's current security positions and the

likelihood that the performance of each security will contribute to the investment objectives of the client.

Clients receive quarterly mailings which detail the assets held in each account, account performance relative to the S&P 500 Index, and performance on each individual security owned during the calendar year.

Client Referrals and Other Compensation

Incoming Referrals

ADVISOR has been fortunate to receive many client referrals over the years. The referrals came from current clients, and from participation in the Advisor Direct program at TD Ameritrade. The firm does compensate TD Ameritrade for these referrals as described more fully in the Section on Additional Services.

Referrals Out

ADVISOR does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

Other Compensation

As disclosed under **Brokerage Practices**, Page 10 above, ADVISOR participates in TD Ameritrade's institutional customer program and ADVISOR may recommend TD Ameritrade to Clients for custody and brokerage services. There is no direct link between ADVISOR's participation in the program and the investment advice it gives to its Clients, although ADVISOR receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving ADVISOR participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to ADVISOR by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by ADVISOR's related persons. Some of the products and services made available by TD Ameritrade through the program may benefit ADVISOR but may not benefit

its Client accounts. These products or services may assist ADVISOR in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help ADVISOR manage and further develop its business enterprise. The benefits received by ADVISOR or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, ADVISOR endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by ADVISOR or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the ADVISOR's choice of TD Ameritrade for custody and brokerage services.

ADVISOR may receive client referrals from TD Ameritrade through its participation in TD Ameritrade AdvisorDirect. In addition to meeting the minimum eligibility criteria for participation in AdvisorDirect, ADVISOR may have been selected to participate in AdvisorDirect based on the amount and profitability to TD Ameritrade of the assets in, and trades placed for, client accounts maintained with TD Ameritrade. TD Ameritrade is a discount broker-dealer independent of and unaffiliated with ADVISOR and there is no employee or agency relationship between them. TD Ameritrade has established AdvisorDirect as a means of referring its brokerage customers and other investors seeking fee-based personal investment management services or financial planning services to independent investment advisors. TD Ameritrade does not supervise ADVISOR and has no responsibility for ADVISOR's management of client portfolios or ADVISOR's other advice or services. ADVISOR pays TD Ameritrade an on-going fee for each successful client referral. This fee is usually a percentage (not to exceed 25%) of the advisory fee that the client pays to ADVISOR ("Solicitation Fee"). ADVISOR will also pay TD Ameritrade the Solicitation Fee on any advisory fees received by Advisor from any of a referred client's family members, including a spouse, child or any other immediate family member who resides with the referred client and hired ADVISOR on the recommendation of such referred client. ADVISOR will not charge clients referred through AdvisorDirect any fees or costs higher than its standard fee schedule offered to its clients or otherwise pass Solicitation Fees paid to TD Ameritrade to its clients. For information regarding additional or other fees paid directly or indirectly to TD Ameritrade, please refer to the TD Ameritrade AdvisorDirect Disclosure and Acknowledgement Form.

Advisor's participation in AdvisorDirect raises potential conflicts of interest. TD Ameritrade will most likely refer clients through AdvisorDirect to investment advisors that encourage their clients to custody their assets at TD Ameritrade and whose client accounts are profitable to TD Ameritrade. Consequently, in order to obtain client referrals from TD Ameritrade, Advisor may have an incentive to recommend to clients that the assets under

management by Advisor be held in custody with TD Ameritrade and to place transactions for client accounts with TD Ameritrade. In addition, Advisor has agreed not to solicit clients referred to it through AdvisorDirect to transfer their accounts from TD Ameritrade or to establish brokerage or custody accounts at other custodians, except when its fiduciary duties require doing so. Advisor's participation in AdvisorDirect does not diminish its duty to seek best execution of trades for client

ADVISOR receives no direct compensation other than that which comes from the client.

- The Firm participates in the TD Ameritrade Institutional program for advisors. TD Ameritrade Institutional is a division of TD Ameritrade, Inc. ("TD Ameritrade") member FINRA/SIPC/NFA. TD Ameritrade is an independent and unaffiliated SEC-registered broker-dealer.
- TD Ameritrade offers to independently registered investment advisors services which include custody of securities, trade execution, and clearance and settlement of transactions. Adviser receives some benefits from TD Ameritrade through its participation in the program.
- The Firm may recommend TD Ameritrade to clients for custody and brokerage services.
- The Firm receives economic benefits through its participation in the program which may include any one or more of the following:
 - Receipt of duplicate client statements and trade confirmations.
 - Research related products and tools.
 - Consulting services.
 - Access to a trading desk serving advisor participants.
 - Access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts).
 - The ability to have advisory fees deducted directly from client accounts.
 - Access to an electronic communications network for client order entry and account information.
 - Access to mutual funds with no transaction fees and to certain institutional money managers.
- The Firm, through its participation in the program, may receive discounts on compliance, marketing, technology, and practice management products or services provided to the Firm by third party vendors.

- These benefits received by the Firm, or its associated persons, do not depend on the amount of brokerage transactions directed to TD Ameritrade.
- Since we recommend TD Ameritrade, there is potentially a conflict of interest. While we believe it is in the client's best interest to use TD Ameritrade, we recognize that a given client's situation may necessitate a different broker. In this case we are willing to discuss other options with the client.

As disclosed under **Brokerage Practices**, Pages 10-12 above, Advisor participates in TD Ameritrade's institutional customer program and Advisor may recommend TD Ameritrade to Clients for custody and brokerage services. There is no direct link between Advisor's participation in the program and the investment advice it gives to its Clients, although Advisor receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving Advisor participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to Advisor by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by Advisor's related persons. Some of the products and services made available by TD Ameritrade through the program may benefit Advisor but may not benefit its Client accounts. These products or services may assist Advisor in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help Advisor manage and further develop its business enterprise. The benefits received by Advisor or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, Advisor endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by Advisor or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the Advisor's choice of TD Ameritrade for custody and brokerage services.

Custody

Account Statements

All assets are held at qualified custodians (such as TD Ameritrade), which means the custodians provide account statements directly to clients at their address of record at least quarterly and in the case of TD Ameritrade, monthly.

Performance Reports

Clients are urged to compare the account statements received directly from their custodians to the performance report statements provided by ADVISOR

Investment Discretion

Discretionary Authority for Trading

ADVISOR accepts non-discretionary authority to manage securities accounts on behalf of clients. ADVISOR does not have the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. ADVISOR consults with the client prior to each trade to obtain trade approval.

The client approves the custodian to be used and the commission rates paid to the custodian. ADVISOR does not receive any portion of the transaction fees or commissions paid by the client to the custodian on certain trades.

Through a limited power of attorney, ADVISOR facilitates placing trades in your accounts on your behalf so that we may promptly implement the investment policy that you have approved in writing.

Limited Power of Attorney

A limited power of attorney is a trading authorization only. You sign a limited power of attorney so that we may execute the trades that you have approved.

Voting Client Securities

Proxy Votes

ADVISOR does not vote proxies on securities. Clients are expected to vote their own proxies.

When assistance on voting proxies is requested, ADVISOR will provide recommendations to the Client. If a conflict of interest exists, it will be disclosed to the Client.

Financial Information

Financial Condition

ADVISOR does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients.

A balance sheet is not required to be provided because Robbins Wealth Management does not serve as a custodian for client funds or securities, and does not require prepayment of fees of more than \$600 per client, and six months or more in advance.

Business Continuity Plan

General

ADVISOR has a Business Continuity Plan in place that provides detailed steps to mitigate and recover from the loss of office space, communications, services or key people.

Disasters

The Business Continuity Plan covers natural disasters such as snow storms, hurricanes, tornados, and flooding. The Plan covers man-made disasters such as loss of electrical power, loss of water pressure, fire, bomb threat, nuclear emergency, chemical event, biological event, T-1 communications line outage, Internet outage, railway accident and aircraft accident. Electronic files are backed up daily and archived offsite.

Alternate Offices

Alternate offices are identified to support ongoing operations in the event the main office is unavailable. It is our intention to contact all clients within five days of a disaster that dictates moving our office to an alternate location.

Loss of Key Personnel

ADVISOR has not signed a Business Continuation Agreement with another financial advisory firm to support ADVISOR in the event of James H. Robbins' serious disability or death. In the event of the death of James H. Robbins, the business will continue under the ownership and operation of Eric J. Robbins. In the event of a common disaster involving both James H. Robbins and Eric J. Robbins the corporate attorney has been instructed to pursue alternatives.

Information Security Program

Information Security

ADVISOR maintains an information security program to reduce the risk that your personal and confidential information may be breached.

Privacy Notice

ADVISOR is committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us.

The categories of nonpublic information that we collect from you may include information about your personal finances, information about your health to the extent that it is needed for the investment management process, and information about transactions between you and third parties. We use this information to help you meet your personal financial goals.

With your permission, we disclose limited information to attorneys, accountants, and mortgage lenders with whom you have established a relationship. You may opt out from our sharing information with these nonaffiliated third parties by notifying us at any time by telephone, mail, fax, email, or in person. With your permission, we share a limited amount of information about you with your brokerage firm in order to execute securities transactions on your behalf.

We maintain a secure office to ensure that your information is not placed at unreasonable risk. We employ a firewall barrier, secure data encryption techniques and authentication procedures in our computer environment.

We do not provide your personal information to mailing list vendors or solicitors. We require strict confidentiality in our agreements with unaffiliated third parties that require access to your personal information, including financial service companies, consultants, and auditors. Federal and state securities regulators may review our Company records and your personal records as permitted by law.

Personally identifiable information about you will be maintained while you are a client, and for the required period thereafter that records are required to be maintained by federal and state securities laws. After that time, information may be destroyed.

We will notify you in advance if our privacy policy is expected to change. We are required by law to deliver this *Privacy Notice* to you annually, in writing.

Brochure Supplement (Part 2B of Form ADV)

Education and Business Standards

ADVISOR requires that advisors in its employ have a bachelor's degree or equivalent education or work experience and further coursework demonstrating knowledge of investment management and tax planning. Examples of acceptable coursework include: an MBA, a CFP[®], a CFA, a ChFC, JD, CTFA, EA or CPA. Additionally, advisors must have work experience that demonstrates their aptitude for financial planning and investment management.

Professional Certifications

Employees have earned certifications and credentials that are required to be explained in further detail.

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 62,000 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.

Chartered Financial Analyst (CFA): Chartered Financial Analysts are licensed by the CFA Institute to use the CFA mark. CFA certification requirements:

- Hold a bachelor's degree from an accredited institution or have equivalent education or work experience.
- Successful completion of all three exam levels of the CFA Program.
- Have 4 years of acceptable professional work experience in the investment decision-making process.
- Fulfill society requirements, which vary by society. Unless you are upgrading from affiliate membership, all societies require two sponsor

statements as part of each application; these are submitted online by your sponsors.

- Agree to adhere to and sign the Member's Agreement, a Professional Conduct Statement, and any additional documentation requested by CFA Institute.

James H. Robbins, CFP®

Educational Background:

- Date of birth: January 14, 1949
- Westminster College, New Wilmington, PA – attended during 1966

Business Experience:

- Self-Employed as an insurance agent (04/1980-Present)
- Self-Employed as a tax preparer (01/1988-Present)
- Registered Representative (09/1996-04/2002) - Tower Square Securities
- Founder of Robbins Wealth Management (09/1990)
- Chief Investment Strategist (09/1990-Present) at Robbins Wealth Management Responsibilities to include final decision regarding acceptable investments and strategy process at Robbins Wealth Management; portfolio management duties; various project management initiatives.

Disciplinary Information: None

Other Business Activities: None

Additional Compensation: None

Supervision:

James H. Robbins is not supervised by anyone since he is the Chief Investment Strategist. He does however frequently interact with Eric J. Robbins, Investment Analyst and Portfolio Manager through frequent office interactions as well as remote interactions. Eric J. Robbins also reviews James H. Robbins' activities through our client relationship management system.

SUPERVISOR'S contact information:

814-838-4185 INFO@INVESTRWM.COM

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None

Eric J. Robbins, CFA

Educational Background:

- Date of birth: August 5, 1976
- BA in Accounting, Asbury College (1998)
- MBA, Gannon University (2005)
- Chartered Financial Analyst Charterholder (2009)

Business Experience (all professional experience at Robbins Wealth Management):

- Investment Analyst and Portfolio Manager (Nov. 2005 - current): Responsibilities include supervision of the investment analysis and strategy process at Robbins Wealth Management; portfolio management duties; various project management initiatives; write monthly *Economic Briefing* and quarterly *Capital Markets Commentary*.
- Junior Analyst and Portfolio Manager (Nov. 2002 – Nov. 2005): Responsibilities included actively assist in the analysis and portfolio management process; various project management initiatives.
- Business Operations (May 1998 – Nov. 2002): Responsibilities included general business operations and client support; various project management initiatives.

Disciplinary Information: None

Other Business Activities:

Eric J. Robbins serves as an Instructor in Finance at Penn State Erie. He began this role in the Spring of 2009.

Additional Compensation: None

Supervision:

Eric J. Robbins is supervised by James H. Robbins, President. He reviews Eric's work through frequent office interactions as well as remote interactions. He also reviews Eric's activities through our client relationship management system.

Jim's contact information:

814-838-4185 jim@investrwm.com

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None

Jeffrey T. Starr Jr.

Educational Background:

- Date of birth: September 26, 1980
- BS in Finance, Penn State Erie (2011)
- BS in Accounting, Penn State Erie (2011)

Business Experience (all professional experience at Robbins Wealth Management):

- Research Assistant (May 2010 - current): Responsibilities include investment research; back office client support.

Disciplinary Information: None

Other Business Activities: None

Additional Compensation: None

Supervision:

Jeffrey T. Starr Jr. is supervised by James H. Robbins, President. He reviews Jeff's work through frequent office interactions as well as remote interactions. He also reviews Jeff's activities through our client relationship management system.

Jim's contact information:

814-838-4185 jim@investrwm.com

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None