

Robin Hood Online Financial Planning Development, LLC

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July 17, 2013

Form ADV Part 2A Brochure

This Brochure provides information about the qualifications and business practices of Robin Hood Online Financial Planning Development, LLC ("Go Robin Hood"). If you have any questions about the contents of this Brochure, please contact us at gorobinhood@triad.rr.com. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority.

An "investment adviser" means any person who, for compensation, engages in the business of advising others, either directly or through publications or writings, as to the value of securities or as to the advisability of investing in, purchasing, or selling securities, or who, for compensation and as part of a regular business, issues or promulgates analyses or reports concerning securities. Registration with the SEC or any state securities authority does not imply a certain level of skill or training.

Additional information about Robin Hood Online Financial Planning Development, LLC is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 - Material Changes

The purpose of this page is to inform you of any material changes since the previous version of this Brochure.

This is our firm's first Brochure and therefore we have not made any material changes. We review and update our Brochure at least annually to make sure that it remains current.

Item 3 - Table of Contents

Contents

Item 1 - Cover Page	1
Item 2 - Material Changes.....	2
Item 3 - Table of Contents	3
Item 4 - Advisory Business.....	4
Item 5 - Fees and Compensation.....	5
Item 6 - Performance-Based Fees and Side-By-Side Management.....	6
Item 7 - Types of Clients	6
Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss	7
Item 9 - Disciplinary Information	8
Item 10 - Other Financial Industry Activities or Affiliations.....	8
Item 11 - Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	9
Item 12 - Brokerage Practices	9
Item 13 - Review of Accounts	10
Item 14 - Client Referrals and Other Compensation	11
Item 15 - Custody	11
Item 16 - Investment Discretion.....	11
Item 17 - Voting Client Securities.....	11
Item 18 - Financial Information.....	11
Item 19 - Requirements of State-Registered Advisers	12
Miscellaneous	12

Item 4 - Advisory Business

Robin Hood Online Financial Planning Development, LLC (hereinafter the "firm" or "Go Robin Hood") is a registered investment adviser based in Winston-Salem, North Carolina. We are a limited liability company under the laws of the State of North Carolina. We have been providing investment advisory services since 2013. David Scott Davis and Frances Harper Davis are the Managing Members and primary owners of the firm.

Currently, we provide subscription based educational services, assisted portfolio management services and asset management services exclusively through our interactive website, www.gorobinhood.com.

You may see the term, Associated Person, used throughout this Brochure. As used in this Brochure, this term refers to anyone from our firm who is an officer, employee, and all individuals providing investment advice on behalf of our firm. Where required, such persons are properly registered as investment adviser representatives.

Educational Membership (Limited Membership)

This service provides clients with access to various web based tools including an explanation of industry terms; various slide presentations; market updates, retirement plan and collage savings guidance; financial planning checklists; an introduction to investing and video tutorials about markets, instruments, investment strategies, analysis, etc.

Education Membership services are considered impersonal investment advice and are not tailored to meet each client's specific needs and objectives.

Assisted Portfolio Management Membership (Standard Membership)

Our Assisted Portfolio Management Membership service provides clients with access to all tools available through our Educational Membership services (described in more detail above) with the addition of web based asset allocation tools; portfolio rebalancing tools; a virtual portfolio manager tool; an investment calendar; quarterly asset allocation review reminders; broker dealer comparison tools; and articles regarding sector ratings, market indicators, current issues, etc. This service also includes various polls and interactive features that allow subscribers to submit requests for information about specific topics. Based on these requests, we may publish additional general topic articles that are posted on our website.

Assisted Portfolio Management Services are considered impersonal investment advice and are not tailored to meet each client's specific needs and objectives. Clients are free to choose to accept or reject the recommendations provided by our asset allocation and portfolio rebalancing tools. Clients who decide to implement these recommendations may do so either through our Asset Management services (described in more detail below) or by using the advisory/brokerage firm of their choice. Unless a clients chooses to implement our recommendations through our Asset Management service, our firm has no ongoing responsibility to monitor client assets or to provide ongoing investment advice.

Web Based Asset Management Service (Wrap Program)

Go Robin Hood has developed a number of model portfolios primarily using exchange traded funds

(ETFs) and, when deemed advantageous, mutual funds. Our model portfolios are designed to address client risk tolerance levels and management styles, and range from ultra conservative to ultra aggressive strategies. Conservative portfolios tend to invest heavily in fixed income ETFs and mutual funds while aggressive portfolios are heavily invested in ETFs and mutual funds that are invested in equity securities. Clients are also given the option of investing a portion of their account in satellite models consisting of specialized investments such as municipal bonds and Treasury Inflation Protected Securities.

Each model is provided with detailed descriptions and investor attributes, such as risk tolerance, time horizon, age, investible assets, investment experience, etc. Clients can use these attributes to choose a model portfolio that is appropriate to their needs.

Go Robin Hood manages investments in its model portfolios on a discretionary basis. Discretionary portfolio management means we will make investment decisions and place buy or sell orders without obtaining client pre-approval. Additionally, due to the nature of services offered, clients are not allowed to place restrictions on investments in the models.

As part of our Asset Management service, we also give our clients complementary full access to our membership services.

Assets Under Management

Due to the nature of our business, Go Robin Hood does not provide continuous asset management services and does not have regulatory assets under management.

Item 5 - Fees and Compensation

Go Robin Hood charges subscription fees and fees based on a percentage of assets under management for its advisory services.

Educational Membership Fees (Limited Membership)

We offer a lifetime membership to our Educational Membership service for a fee of \$35.00. This fee is charged through an Electronic payment via debit or credit card.

Assisted Portfolio Management Membership Fees (Standard Membership)

Our Assisted Portfolio Management Membership service is offered for a fee of \$65.00 per annum. This fee is charged through an Electronic payment via debit or credit card. Occasionally, we may offer multiple year subscription offers that may include a reduced annual rate.

Our Assisted Portfolio Management Membership service is automatically renewed on an annual basis. Clients may terminate their subscription after their initial payment. Written notification of your intent to terminate must be emailed to gorobinhood@triad.rr.com within 48 hours of renewal.

Web Based Asset Management Service Fees

On an annualized basis, we charge an advisory fee of 0.45% of the market value of the assets being managed. The custodian holding the client's account will deduct the fees directly from the account. The

client must consent in advance to direct debiting of their account. The qualified custodian holding the client's funds and securities will send an account statement at least quarterly. This statement will detail account activity. Clients should review each statement for accuracy. As part of our Asset Management service, clients receive complementary access to our standard membership services.

At the inception of investment management services, the first quarter's fees will be calculated on a pro-rata basis. The Advisory Agreement between Go Robin Hood and the client will continue in effect until either party terminates the Agreement by providing a 30 days' written notice. Clients can also terminate their account by transferring funds via an Automated Customer Account Transfer ("ACAT"). Go Robin Hood's annual fee will be pro-rated through the date of termination and any remaining balance shall be refunded to the client, as appropriate, in a timely manner.

Additional Fees and Expenses

Go Robin Hood's fees are charged as described above and are not based on a share of capital gains on the funds of an advisory client.

All fees paid to Go Robin Hood for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds or exchange traded funds ("ETFs") to their shareholders. These fees and expenses are described in each fund's prospectus. These fees may include a management fee, other fund expenses, early redemption fee and a possible distribution fee. If the fund also imposes sales charges, a client may pay an initial or deferred sales charge.

A client could invest in a mutual fund or ETF directly, without the services of Go Robin Hood. In that case, the client would not receive the services provided by Go Robin Hood which are designed, among other things, to assist the client in determining which mutual fund or funds are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the funds and the fees charged by Go Robin Hood to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

Item 6 - Performance-Based Fees and Side-By-Side Management

We and our Associated Persons do not accept performance based fees. Performance based fees are based on a share of capital gains on or capital appreciation of the client's assets.

Item 7 - Types of Clients

We primarily offer investment advisory services to individuals.

Go Robin Hood requires a minimum investment of \$20,000 to open and maintain an asset management account. At our sole discretion we may waive this requirement. We will allow accounts of members of the same household to be aggregated for purposes of meeting the minimum account size.

Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss

The following are different methods of analysis that we may use when providing you with investment advice:

- Charting – charting is a technique that attempts to forecast future market moves by studying historical data on charts.
- Fundamental Analysis – fundamental analysis is a technique that attempts to determine a security's value by focusing on underlying factors that affect a company's actual business and its future prospects. The term refers to the analysis of the economic well-being of a financial entity as opposed to only its price movements.
- Technical Analysis – technical analysis is a technique that relies on the assumption that current market data (such as charts of price, volume, and open interest) can help predict future market trends, at least in the short term. It assumes that market psychology influences trading and can predict when stocks will rise or fall.
- Cyclical Analysis – cyclical analysis is a technique that looks at cycles, specifically analyzing the way prices follow certain patterns and trends.

We may use one or more of the following investment strategies when advising you on investments:

- Long Term Purchases – securities held for over a year.
- Short Term Purchases – securities held for less than a year.
- Trading – securities are sold within 30 days.

The investment advice provided along with the strategies we suggest will vary depending on each client's specific financial situation and goals. **Investing in securities involves risk of loss that clients should be prepared to bear.**

This brief statement does not disclose all of the risks and other significant aspects of investing in financial markets. In light of the risks, you should fully understand the nature of the contractual relationship(s) into which you are entering and the extent of your exposure to risk. Certain investing strategies may not be suitable for many members of the public. You should carefully consider whether the strategies employed will be appropriate for you in light of your experience, objectives, financial resources and other relevant circumstances.

General Investment Risk: All investments come with the risk of losing money. Investing involves substantial risks, including complete possible loss of principal plus other losses and may not be suitable for many members of the public. Investments, unlike savings and checking accounts at a bank, are not insured by the government to protect against market losses. Different market instruments carry different types and degrees of risk and you should familiarize yourself with the risks involved in the particular market instruments you intend to invest in.

Loss of Value: There can be no assurance that a specific investment will achieve its investment objectives and past performance should not be seen as a guide to future returns. The value of investments and the income derived may fall as well as rise and investors may not recoup the original amount invested. Investments may also be affected by any changes in exchange control regulation, tax laws, withholding taxes, international, political and economic developments, and government, economic or monetary policies.

Interest Rate Risk: Fixed income securities and funds that invest in bonds and other fixed income securities may fall in value if interest rates change. Generally, the prices of debt securities rise when interest rates fall, and their prices fall when interest rates rise. Longer term debt securities are usually more sensitive to interest rate changes.

Credit Risk: Investments in bonds and other fixed income securities are subject to the risk that the issuer(s) may not make required interest payments. An issuer suffering an adverse change in its financial condition could lower the credit quality of a security, leading to greater price volatility of the security. A lowering of the credit rating of a security may also offset the security's liquidity, making it more difficult to sell. Funds investing in lower quality debt securities are more susceptible to these problems and their value may be more volatile.

Foreign Exchange Risk: Foreign investments may be affected favorably or unfavorably by exchange control regulations or changes in the exchange rates. Changes in currency exchange rates may influence the share value, the dividends or interest earned and the gains and losses realized. Exchange rates between currencies are determined by supply and demand in the currency exchange markets, the international balance of payments, governmental intervention, speculation and other economic and political conditions. If the currency in which a security is denominated appreciates against the US Dollar, the value of the security will increase. Conversely, a decline in the exchange rate of the currency would adversely affect the value of the security.

Item 9 - Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of us or the integrity of our management. There is no history of reportable material legal or disciplinary events by our firm or our management persons.

Item 10 - Other Financial Industry Activities or Affiliations

Our firm and our related persons conduct financial industry relationships on an independent and unaffiliated basis. This practice minimizes any material client advisory business conflicts of interest.

Item 11 - Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Description of Our Code of Ethics

Go Robin Hood has adopted a Code of Ethics (the "Code") to address investment advisory conduct. The Code focuses primarily on fiduciary duty, personal securities transactions, insider trading, gifts, and conflicts of interest. The Code includes Go Robin Hood's policies and procedures developed to protect clients' interests in relation to the following topics:

- The duty at all times to place the interests of clients first;
- The requirement that all personal securities transactions be conducted in such a manner as to be consistent with the Code.
- The responsibility to avoid any actual or potential conflict of interest or misuse of an employee's position of trust and responsibility;
- The fiduciary principle that information concerning the identity of security holdings and financial circumstances of clients is kept confidential; and
- The principle that independence in the investment decision-making process is paramount.

A copy of Go Robin Hood's Code of Ethics is available upon request to David S. Davis, Managing Member, at gorobinhood@triad.rr.com.

Personal Trading Practices

At times Go Robin Hood and/or its Advisory Representatives may take positions in the same securities as clients, which may pose a conflict of interest with clients. Go Robin Hood and its Advisory Representatives will generally be "last in" and "last out" for the trading day when trading occurs in close proximity to client trades. We will not violate our fiduciary responsibilities to our clients. Front running (trading shortly ahead of clients) is prohibited. Incidental trading not deemed to be a conflict (i.e. a purchase or sale which is minimal in relation to the total outstanding value, and as such would have negligible effect on the market price), would not be disclosed at the time of trading.

Item 12 - Brokerage Practices

Go Robin Hood requires Web Based Asset Management Service clients to establish brokerage arrangements and maintain custody of assets through Mid Atlantic Capital Corporation ("Mid Atlantic"), Member FINRA/SIPC. Mid Atlantic offers independent investment advisers services which include custody of client securities, trade execution, clearance and settlement of transactions, and daily research and investment information.

Research and Other Soft Dollar Benefits

Custodians will hold your assets in a brokerage account and buy and sell securities upon our request. Go Robin Hood recommends a custodian based on the proven integrity and financial responsibility of the firm, best execution of orders at reasonable commission rates, and quality of client service. We are independently owned and operated and do not receive fees or commissions from any custodian or

broker-dealer. Although not considered “soft dollar” compensation, Go Robin Hood may receive benefits from Mid Atlantic such as electronic delivery of client information, electronic trading platforms, institutional trading support, proprietary and/or third party research, continuing education, practice management advice, and other services provided by custodians for the benefit of investment advisory clients.

Go Robin Hood understands its duty for best execution of client trade orders and considers all factors in recommending Mid Atlantic to clients. These research services may be useful in servicing all Go Robin Hood clients, and may not be used in connection with any particular account or client. While Go Robin Hood may not always obtain the lowest transaction rates, Go Robin Hood believes the rate is reasonable in relation to the value of the brokerage and research services provided.

Brokerage for Client Referrals

We do not receive client referrals from custodians or broker-dealers in which we have an institutional advisory arrangement. Also, we do not receive other benefits from custodians or broker-dealers in exchange for client referrals.

Directed Brokerage

Due to the nature of our business, we do not allow clients to direct brokerage. All client trades are executed at Mid Atlantic.

Trade Aggregation

While individual client advice is provided for each account, client trades may be executed as a block trade. Only accounts in the custody of Mid Atlantic will have the opportunity to participate in aggregated securities transactions. All aggregated trades using Mid Atlantic will be done in the name of Go Robin Hood. Mid Atlantic will be informed that the trades are for the account of Go Robin Hood's clients and not for Go Robin Hood itself. No advisory account within the block trade will be favored over any other advisory account, and thus, each account will participate in an aggregated order at the average share price. The aggregation should, on average, reduce slightly the costs of execution, and Go Robin Hood will not aggregate a client's order if in a particular instance Go Robin Hood believes that aggregation would cause the client's cost of execution to be increased. Mid Atlantic will be notified of the amount of each trade for each account. Go Robin Hood and/or its Associated Persons may participate in block trades with clients, and may also participate on a pro rata basis for partial fills, but only after the determination has been made that clients will receive fair and equitable treatment.

Item 13 - Review of Accounts

Portfolio Management Account Reviews

David S. Davis, Managing Member of Go Robin Hood, monitors our model portfolios on an ongoing basis. Typically, our model portfolios are rebalanced on a quarterly basis and in all cases, portfolios will be rebalanced at least annually.

Clients will receive consolidated reports and statements directly from their account custodian(s) on at least a quarterly basis.

Item 14 - Client Referrals and Other Compensation

Go Robin Hood and its Associated Persons do not receive any economic benefits, sales awards, or other prizes from any outside parties in connection with providing investment advisory services to clients.

We and our related persons do not compensate, either directly or indirectly, any person or entity who is not our supervised person for client referrals.

Item 15 - Custody

Go Robin Hood does not have physical custody of any assets held for clients. Pursuant to our Investment Advisory Agreement with you, we have authority to debit advisory fees from your brokerage account. This is common practice among investment advisers. We urge our clients to review their custodial account statements for accuracy.

Item 16 - Investment Discretion

Go Robin Hood manages investments in its model portfolios on a discretionary basis. Discretionary portfolio management means we will make investment decisions and place buy or sell orders without obtaining client pre-approval. Additionally, due to the nature of services offered, clients are not allowed to place restrictions on investments in the models.

Item 17 - Voting Client Securities

Proxy Voting

Go Robin Hood does not vote proxies or give any advice about how to vote proxies. It is the client's responsibility to vote proxies. Clients will receive proxy materials directly from the custodian.

Item 18 - Financial Information

We are required in this Item to provide you with certain financial information or disclosures about Go Robin Hood's financial condition. Go Robin Hood does not require the prepayment of over \$1,200, six or

more months in advance. Additionally, Go Robin Hood has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

Item 19 - Requirements of State-Registered Advisers

This section is intentionally left blank- Our Firm is SEC registered

Miscellaneous

Confidentiality

Go Robin Hood views protecting its customers' private information as a top priority and, pursuant to the requirements of the Gramm-Leach-Bliley Act, the firm has instituted policies and procedures to ensure that customer information is kept private and secure.

Go Robin Hood does not disclose any nonpublic personal information about its customers or former customers to any nonaffiliated third parties, except as permitted by law. In the course of servicing a client account, Go Robin Hood may share some information with its service providers, such as transfer agents, custodians, broker-dealers, accountants, and lawyers.

Go Robin Hood restricts internal access to nonpublic personal information about its clients to those employees who need to know that information in order to provide products or services to the client. Go Robin Hood maintains physical and procedural safeguards that comply with state and federal standards to guard a client's nonpublic personal information and ensure its integrity and confidentiality. As emphasized above, it has always been and will always be the firm's policy never to sell information about current or former customers or their accounts to anyone. It is also the firm's policy not to share information unless required to process a transaction, at the request of the client, or as required by law.

A copy of the firm's privacy policy notice will be provided to each client prior to, or contemporaneously with, the execution of the Advisory Agreement. Thereafter, the firm will deliver a copy of the current privacy policy notice to its clients on an annual basis. If you have any questions on this policy, please contact David S. Davis, Managing Member, at gorobinhood@triad.rr.com.

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July 17, 2013

Firm Form ADV Part 2A, Appendix 1: Wrap Fee Program Brochure

Robin Hood Online Financial Planning Development, LLC is an investment adviser registered with the Securities and Exchange Commission ("SEC"). An "investment adviser" means any person who, for compensation, engages in the business of advising others, either directly or through publications or writings, as to the value of securities or as to the advisability of investing in, purchasing, or selling securities, or who, for compensation and as part of a regular business, issues or promulgates analyses or reports concerning securities. Registration with the SEC or any state securities authority does not imply a certain level of skill or training.

This Wrap Fee program brochure provides information about the qualifications and business practices of Robin Hood Online Financial Planning Development, LLC. If you have any questions about the contents of this brochure, please contact us at (336) 723-6030, or via email at gorobinhood@triad.rr.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 Robin Hood Online Financial Planning Development, LLC is available on the SEC's website at www.adviserinfo.sec.gov.

Material Changes - Item 2

The purpose of this page is to inform you of any material changes since the previous version of this brochure.

This is our firm's first brochure and therefore we have not made any material changes. We review and update our brochure at least annually to make sure that it remains current.

Table of Contents - Item 3

Contents

Material Changes - Item 2.....	2
Table of Contents - Item 3	3
Services, Fees and Compensation - Item 4	4
Account Requirements and Types of Clients - Item 5	6
Portfolio Manager Selection and Evaluation - Item 6	6
Client Information Provided to Portfolio Managers - Item 7.....	9
Client Contact with Portfolio Managers - Item 8	9
Additional Information - Item 9	10
Requirements for State-Registered Advisors - Item 10.....	11

Services, Fees and Compensation - Item 4

Services

Robin Hood Online Financial Planning Development, LLC (hereinafter "Go Robin Hood") offers web based asset management services. This Brochure provides a description of the advisory services offered under the Web Based Asset Management Program. For more information about the firm's other investment advisory services, please contact the firm for a copy of the firm's Form ADV Part 2A or go to www.adviserinfo.sec.gov.

In the Web Based Asset Management Program, the firm provides ongoing investment advice and management on assets in the client's account. The firm's Wrap Program is managed to diversify our clients' portfolio holdings and primarily invests in exchange traded funds (ETFs) and, when deemed advantageous, mutual funds. Our model portfolios are designed to address client risk tolerance levels and management styles, and range from ultra conservative to ultra aggressive strategies. Conservative portfolios tend to invest heavily in fixed income ETFs and mutual funds while aggressive portfolios are heavily invested in ETFs and mutual funds that are invested in equity securities. Clients are also given the option of investing a portion of their account in satellite models consisting of specialized investments such as municipal bonds and Treasury Inflation Protected Securities.

Each model is provided with detailed descriptions and investor attributes, such as risk tolerance, time horizon, age, investible assets, etc. Clients can use these attributes to choose a model portfolio that is appropriate for their needs.

Go Robin Hood manages investments in its model portfolios on a discretionary basis. Discretionary portfolio management means we will make investment decisions and place buy or sell orders without obtaining client pre-approval. Additionally, due to the nature of services offered, clients are not allowed to place restrictions on investments in the models.

As part of our Asset Management service, we also give our clients complementary full access to our membership services.

Assets for program accounts are held at Mid Atlantic Capital Corporation ("Mid Atlantic"), a registered broker/dealer and member of FINRA.

Fees

In the Web Based Asset Management Program, clients pay a single annual advisory fee for advisory services and execution of transactions. Clients do not pay brokerage commissions or transaction charges for execution of transactions in addition to the advisory fee.

On an annualized basis, we charge an advisory fee of 0.45% of the market value of the assets being managed. The custodian holding the client's account will deduct the fees directly from the account. The client must consent in advance to direct debiting of their account. The qualified custodian holding the client's funds and securities will send an account statement at least quarterly. This statement will detail account activity. Clients should review each statement for accuracy. As part of our Asset Management service, clients receive complementary access to our standard membership services.

At the inception of investment management services, the first quarter's fees will be calculated on a pro-rata basis. The Advisory Agreement between Go Robin Hood and the client will continue in effect until either party terminates the Agreement by providing a 30 days' written notice. Clients can also terminate their account by transferring funds via an Automated Customer Account Transfer ("ACAT"). Go Robin Hood's annual fee will be pro-rated through the date of termination and any remaining balance shall be refunded to the client, as appropriate, in a timely manner.

Although clients do not pay a transaction charge for trades in a program account, clients should be aware that the firm pays Mid Atlantic a fee of 0.15% of market value of assets under management. This fee is built into the 0.45% fee paid to the firm. This fee covers the custodial and transaction fees for the account. Because the firm pays the transaction charges in program accounts, there is a conflict of interest. Clients should understand that the cost to the firm of transaction charges may be a factor that the firm considers when deciding which broker dealer or custodian to use.

Other Types of Fees and Charges

Program accounts will incur additional fees and charges from parties other than the firm as noted below. These fees and charges are in addition to the advisory fee paid to the firm. The firm does not share in any portion of these third party fees.

All fees paid to Go Robin Hood for investment advisory services are separate and distinct from the fees and expenses charged by exchange traded funds ("ETFs") or mutual funds to their shareholders. These fees and expenses are described in each fund's prospectus. These fees may include a management fee, other fund expenses, early redemption fee and a possible distribution fee. A client could invest in a mutual fund directly, without the services of Go Robin Hood. In that case, the client would not receive the services provided by Go Robin Hood which are designed, among other things, to assist the client in determining which ETF or funds are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the funds and the fees charged by Go Robin Hood to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

Further information regarding fees assessed by ETFs and mutual funds is available in the appropriate prospectus, which is available upon request from the firm or from the product sponsor directly.

Other Important Considerations

The advisory fee is an ongoing wrap fee for investment advisory services, the execution of transactions and other administrative and custodial services. The advisory fee may cost the client more than purchasing the program services separately, for example, paying an advisory fee plus commissions for transactions in the account. Factors that bear upon the cost of the account in relation to the cost of the same services purchased separately include the type and size of the account, historical and or expected size or number of trades for the account, and the ongoing management services provided to the client.

The advisory fee may also cost the client more than if assets were held in a traditional brokerage account. In a brokerage account, a client is charged a commission for each transaction, and the representative has no duty to provide ongoing advice with respect to the account. If the client plans to

follow a buy and hold strategy for the account or does not wish to purchase ongoing investment advice or management services, the client should consider opening a brokerage account rather than a program account.

Account Requirements and Types of Clients - Item 5

We generally offer investment advisory services to individuals.

Go Robin Hood requires a minimum investment of \$20,000 to open and maintain an asset management account. At our sole discretion we may waive this requirement. We will allow accounts of members of the same household to be aggregated for purposes of meeting the minimum account size.

Portfolio Manager Selection and Evaluation - Item 6

Portfolio Managers

In the Web Based Asset Management Program, Go Robin Hood does not select, review or recommend other investment advisors or portfolio managers. The firm, through its associated persons, is responsible for the investment advice and management offered to clients. Currently, the individual involved in determining or giving investment advice is David Scott Davis, Managing Member. Mr. Davis is registered as an investment adviser representative in the State of North Carolina. Clients should refer to Mr. Davis's ADV Part 2B Brochure Supplement, provided along with this Brochure, for more information about his experience and qualifications.

In addition to providing advisory services under the Web Based Asset Management Program, we offer the following investment advisory services:

Educational Membership (Limited Membership)

This service provides clients with access to various web based tools including an explanation of industry terms; various slide presentations; market updates, retirement plan and collage savings guidance; financial planning checklists; an introduction to investing and video tutorials about markets, instruments, investment strategies, analysis, etc.

Education Membership services are considered impersonal investment advice and are not tailored to meet each client's specific needs and objectives.

Assisted Portfolio Management Membership (Standard Membership)

Our Assisted Portfolio Management Membership service provides clients with access to all tools available through our Educational Membership services (described in more detail above) with the addition of web based asset allocation tools; portfolio rebalancing tools; a virtual portfolio manager tool; an investment calendar; quarterly asset allocation review reminders; broker dealer comparison tools; and articles regarding sector ratings, market indicators, current issues, etc. This service also

includes various polls and interactive features that allow subscribers to submit requests for information about specific topics. Based on these requests, we may publish additional general topic articles that are posted on our website.

Assisted Portfolio Management Services are considered impersonal investment advice and are not tailored to meet each client's specific needs and objectives. Clients are free to choose to accept or reject the recommendations provided by our asset allocation and portfolio rebalancing tools. Clients who decide to implement these recommendations may do so either through our Asset Management services (described in more detail below) or by using the advisory/brokerage firm of their choice. Unless a client chooses to implement our recommendations through our Asset Management service, our firm has no ongoing responsibility to monitor client assets or to provide ongoing investment advice.

Performance-Based Fees and Side-By-Side Management

We and our Associated Persons do not accept performance based fees. Performance based fees are based on a share of capital gains on or capital appreciation of the client's assets.

The following are different methods of analysis that we may use when providing you with investment advice:

- Charting – charting is a technique that attempts to forecast future market moves by studying historical data on charts.
- Fundamental Analysis – fundamental analysis is a technique that attempts to determine a security's value by focusing on underlying factors that affect a company's actual business and its future prospects. The term refers to the analysis of the economic well-being of a financial entity as opposed to only its price movements.
- Technical Analysis – technical analysis is a technique that relies on the assumption that current market data (such as charts of price, volume, and open interest) can help predict future market trends, at least in the short term. It assumes that market psychology influences trading and can predict when stocks will rise or fall.
- Cyclical Analysis – cyclical analysis is a technique that looks at cycles, specifically analyzing the way prices follow certain patterns and trends.

We may use one or more of the following investment strategies when advising you on investments:

- Long Term Purchases – securities held for over a year.
- Short Term Purchases – securities held for less than a year.
- Trading – securities are sold within 30 days.

The investment advice provided along with the strategies we suggest will vary depending on our clients' financial situation and goals. **Investing in securities involves risk of loss that clients should be prepared to bear.**

This brief statement does not disclose all of the risks and other significant aspects of investing in financial markets. In light of the risks, you should fully understand the nature of the contractual relationship(s) into which you are entering and the extent of your exposure to risk. Certain investing strategies may not be suitable for many members of the public. You should carefully consider whether

the strategies employed will be appropriate for you in light of your experience, objectives, financial resources and other relevant circumstances.

General Investment Risk: All investments come with the risk of losing money. Investing involves substantial risks, including complete possible loss of principal plus other losses and may not be suitable for many members of the public. Investments, unlike savings and checking accounts at a bank, are not insured by the government to protect against market losses. Different market instruments carry different types and degrees of risk and you should familiarize yourself with the risks involved in the particular market instruments you intend to invest in.

Loss of Value: There can be no assurance that a specific investment will achieve its investment objectives and past performance should not be seen as a guide to future returns. The value of investments and the income derived may fall as well as rise and investors may not recoup the original amount invested. Investments may also be affected by any changes in exchange control regulation, tax laws, withholding taxes, international, political and economic developments, and government, economic or monetary policies.

Interest Rate Risk: Fixed income securities and funds that invest in bonds and other fixed income securities may fall in value if interest rates change. Generally, the prices of debt securities rise when interest rates fall, and their prices fall when interest rates rise. Longer term debt securities are usually more sensitive to interest rate changes.

Credit Risk: Investments in bonds and other fixed income securities are subject to the risk that the issuer(s) may not make required interest payments. An issuer suffering an adverse change in its financial condition could lower the credit quality of a security, leading to greater price volatility of the security. A lowering of the credit rating of a security may also offset the security's liquidity, making it more difficult to sell. Funds investing in lower quality debt securities are more susceptible to these problems and their value may be more volatile.

Foreign Exchange Risk: Foreign investments may be affected favorably or unfavorably by exchange control regulations or changes in the exchange rates. Changes in currency exchange rates may influence the share value, the dividends or interest earned and the gains and losses realized. Exchange rates between currencies are determined by supply and demand in the currency exchange markets, the international balance of payments, governmental intervention, speculation and other economic and political conditions. If the currency in which a security is denominated appreciates against the US Dollar, the value of the security will increase. Conversely, a decline in the exchange rate of the currency would adversely affect the value of the security.

Proxy Voting

Go Robin Hood does not vote proxies. It is the client's responsibility to vote proxies. Clients will receive proxy materials directly from the custodian. Questions about proxies may be made via the contact information on the cover page.

Client Information Provided to Portfolio Managers - Item 7

In the Web Based Asset Management Program, the firm is responsible for the management of the model portfolios; there is no separate portfolio manager involved. Each model is provided with detailed descriptions and investor attributes, such as risk tolerance, time horizon, age, investible assets, etc. Clients can use these attributes to chose a model portfolio that is appropriate to their needs.

Clients should be aware that the investment objective selected for the program is an overall objective for the entire account and may be inconsistent with a particular holding and the account's performance at any time. Clients should further be aware that achievement of the stated investment objective is a long-term goal for the account.

Confidentiality

Go Robin Hood views protecting its customers' private information as a top priority and, pursuant to the requirements of the Gramm-Leach-Bliley Act, the firm has instituted policies and procedures to ensure that customer information is kept private and secure.

Go Robin Hood does not disclose any nonpublic personal information about its customers or former customers to any nonaffiliated third parties, except as permitted by law. In the course of servicing a client account, Go Robin Hood may share some information with its service providers, such as transfer agents, custodians, broker-dealers, accountants, and lawyers.

Go Robin Hood restricts internal access to nonpublic personal information about its clients to those employees who need to know that information in order to provide products or services to the client. Go Robin Hood maintains physical and procedural safeguards that comply with state and federal standards to guard a client's nonpublic personal information and ensure its integrity and confidentiality. As emphasized above, it has always been and will always be the firm's policy never to sell information about current or former customers or their accounts to anyone. It is also the firm's policy not to share information unless required to process a transaction, at the request of the client, or as required by law.

A copy of the firm's privacy policy notice will be provided to each client prior to, or contemporaneously with, the execution of the Advisory Agreement. Thereafter, the firm will deliver a copy of the current privacy policy notice to its clients on an annual basis. If you have any questions on this policy, please contact David S. Davis, Managing Member, at gorobinhood@triad.rr.com.

Client Contact with Portfolio Managers - Item 8

Go Robin Hood and its Associated Persons are the sole portfolio managers to the Program. Clients are free to contact us at any time. Our primary contact regarding questions about the Program is David Davis, Managing Member. Clients may contact Mr. Davis at gorobinhood@triad.rr.com.

Additional Information - Item 9

Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of us or the integrity of our management. There is no history of material legal or disciplinary events by our firm or our management persons.

Other Financial Industry Activities or Affiliations

Our firm and our related persons conduct financial industry relationships on an independent and unaffiliated basis. This practice minimizes any material client advisory business conflicts of interest.

Description of Our Code of Ethics

Go Robin Hood has adopted a Code of Ethics (the "Code") to address investment advisory conduct. The Code focuses primarily on fiduciary duty, personal securities transactions, insider trading, gifts, and conflicts of interest. The Code includes Go Robin Hood's policies and procedures developed to protect client's interests in relation to the following topics:

- The duty at all times to place the interests of clients first;
- The requirement that all personal securities transactions be conducted in such a manner as to be consistent with the code of ethics.
- The responsibility to avoid any actual or potential conflict of interest or misuse of an employee's position of trust and responsibility;
- The fiduciary principle that information concerning the identity of security holdings and financial circumstances of clients is confidential; and
- The principle that independence in the investment decision-making process is paramount.

A copy of Go Robin Hood's Code of Ethics is available upon request to David S. Davis, Managing Member, at gorobinhood@triad.rr.com.

Personal Trading Practices

At times Go Robin Hood and/or its Advisory Representatives may take positions in the same securities as clients, which may pose a conflict of interest with clients. Go Robin Hood and its Advisory Representatives will generally be "last in" and "last out" for the trading day when trading occurs in close proximity to client trades. We will not violate our fiduciary responsibilities to our clients. Front running (trading shortly ahead of clients) is prohibited. Should a conflict occur because of materiality (i.e. a thinly traded stock), disclosure will be made to the client(s) at the time of trading. Incidental trading not deemed to be a conflict (i.e. a purchase or sale which is minimal in relation to the total outstanding value, and as such would have negligible effect on the market price), would not be disclosed at the time of trading.

Portfolio Management Account Reviews

David S. Davis, Managing Member of Go Robin Hood, monitors our model portfolios on an ongoing basis. Typically, our model portfolios are rebalanced on a quarterly basis and in all cases, portfolios will be rebalanced at least annually.

Statements and Reports

Clients will receive consolidated reports and statements directly from their account custodian(s) on at least a quarterly basis.

Client Referrals and Other Compensation

Go Robin Hood may receive additional benefits from Mid Atlantic such as electronic delivery of client information, electronic trading platforms, institutional trading support, proprietary and/or third party research, practice management advice, and other services provided by custodians for the benefit of investment advisory clients.

Go Robin Hood does not compensate, either directly or indirectly, any person or entity who is not our supervised person for client referrals.

Financial Information

We are required in this Item to provide you with certain financial information or disclosures about Go Robin Hood's financial condition. Go Robin Hood does not require the prepayment of over \$1,200, six or more months in advance. Additionally, Go Robin Hood has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

Requirements for State-Registered Advisors - Item 10**Other Relationships or Arrangements With Issuers of Securities**

Our firm and our related persons do not have any relationships or arrangements with any issuer of securities.