



9000 Keystone Crossing
Suite 700
Indianapolis, IN 46240
www.Robovise.com

Form ADV Part 2A

August 5, 2018

This brochure (“Brochure”) provides information about the qualifications and business practices of Robovise, LLC (“Robo”), a Registered Investment Adviser. Registration of an investment advisor does not imply a certain level of skill or training but only indicates that Robovise has registered its business with state and federal regulatory authorities. 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.

If you have any questions about the contents of this Brochure, please contact Robovise at (317) 513-5544 or support@robovise.com . Additional information about Robovise is also available on the SEC’s website at www.adviserinfo.sec.gov .

Item 2 Material Changes

On December 31st, 2017, Robovise, LLC amended its membership agreement to include the following members equity.

Richard Parker	45.42%
Jim Titak	5.68%
Duane Sobecki	17.03%
Adam Kennedy	15.87%
Developer Town Starts	16.00%

On August 1st, 2018, Robovise contracted with TD Ameritrade Institutional, Division of TD Ameritrade, Inc., (member FINRA/SIPC), to provide Robovise clients custody, clearing, brokerage and execution services.

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Item 4 Advisory Business

1. General Description of the Firm

Robovise is an automated online portfolio management solution registered with the Securities and Exchange Commission ("SEC"). Robovise customizes and simplifies the investment process for clients ("Clients") and prospective client accounts with custom algorithms, comparisons and charting. Robovise offer management for client accounts through the Robovise Wrap Fee Program (See Wrap Fee Brochure attached.) Founded in 2015, Robovise is a privately held company headquartered in Indianapolis, IN. Additional information about Robovise is provided in Part 1 of Robovise's ADV available online at www.sec.gov. Please visit our website www.robovise.com for additional information.

2. Summary of Robovise's Advisory Services

Robovise provides an automated investment service based on a client's age and risk tolerance to create an individualized portfolio for its clients. Robovise creates an investment plan tailored for each of its Clients utilizing:

- A) Proper asset allocations in which to invest
- B) Efficient assets vehicles to invest, primarily exchange traded funds (ETF's) and mutual funds
- C) Rebalancing at appropriate time
- D) Tax harvesting for non-qualified accounts

3. Tailored Services and Investment Restrictions

Robovise styles its software based financial advisor service to the individual needs of each of its Clients, Accounts for Clients ("Client Accounts" or "Accounts") are opened and maintained according to a Client Account Agreement ("Account Agreement") which describes the discretionary authority that a Client grants to Robovise.

To model Robovise's software based financial advisor services to each Client, Robovise uses its processes and algorithms, which are based on modern portfolio theory to access investor's risk tolerance. Robovise asks each prospective Client questions and age-based modeling to evaluate risk and place each client into the proper core/satellite asset portfolio.

4. Wrap Fee Programs

Assets of Robovise are managed as part of Robovise's Discretionary Wrap Fee Program (See Robovise Wrap Fee Brochure attached). Robovise's Wrap Fee Program provides clients investment guidance, portfolio management, and brokerage services for one comprehensive fee based on a percentage of individual account assets. A wrap account is a managed investment plan in which all expenses, including brokerage commissions, management fees, and administrative costs, are "wrapped" into a single charge. In order to implement Robovise's continuous investment advice, the firm provides this Wrap Fee Program only on a discretionary basis. Robovise will contact clients' periodically to determine whether their financial situation or investment objectives have changed, or if they want to modify their Account.

5. Assets Under Management

As of December 31st, 2017, Robovise manages \$0 in client's assets on a discretionary basis. Robovise does not manage assets on a Non- discretionary basis.

Item 5 Fees and Compensation

1. Advisory Fees

Robovise is compensated for its advisory services by charging a fee based on an annual fee schedule outlined Robovise wrap fee program. Depending on various factors, advisory fees may be negotiable. The annual fee is charged on a quarterly basis in arrears. At the end of each calendar quarter the total of each account will be multiplied by the appropriate fee and then divided by 4. This fee will then be accessed and deducted from the advisory account. The fee will be deducted from the client account no later than the 20th business day of the following month. In the event that the client would terminate the agreement mid-quarter, Robovise reserves the right to charge the prorated fee at the time the termination is received. Accounts initiated during a calendar quarter will be charged a pro-rated fee.

Either party may terminate the agreement at any time by written notice. Upon receipt of notice from the client (or authorized representative of the client), Robovise will consider the Agreement to be terminated. Adviser and Custodian reserve the right to finish any open transactions and collect any earned and unpaid fees that are due and payable.

2. Other Fees

Robovise is a fee only investment advisor. Other types of charges or expenses clients may pay in connection with the Robovise Account include:

Advisory account fees are exclusive of transaction fees and other related costs and expenses, which may be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, and third parties, such as fees charged by managers, custodial fees, IRA custody fees, odd-lot differentials, transfer taxes, postage and handling, electronic funds fees, and other fees and taxes on brokerage accounts and securities transactions. These fees are usually small and are incidental to the importance of the security being purchased or sold.

- If margin is used in the account, the fee will be based on the market value of the securities. Robovise charges on gross value of assets under management, not on net value.
- Clients of Robovise have the option to purchase investment products that Robovise recommends through other broker or agents that are not affiliated with Robovise.
- Cash in the advisory account will be billed at the same rate as the securities in the account, pursuant to the fee schedule located in the Robovise Wrap Account Brochure.

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

Robovise does not charge performance-based fees. Our advisory fees are only charged as disclosed above in Item 5.

Item 7 Types of Clients

Account Requirements and Types of Clients

Robovise provides online investment advice and portfolio management services to retail individuals, high net worth individuals, and corporations. The minimum amount required to open and maintain a Robovise account is \$500. Any account below \$5000 may require the account holder to add additional funds on a consistent and ongoing basis.

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

Robovise and its' Adviser Representatives select exchange traded funds (ETF's) and mutual funds that we believe have the potential to generate a favorable return based on our perception of the associated risk in an asset allocation model.

Robovise will primarily use exchange traded funds (ETF's) and mutual funds to create an asset allocation model that is geared toward each individual risk tolerance. This risk tolerance is assessed by the age of the individual and the questions asked. Each available exchange traded fund (ETF's) and mutual fund is entered into the Thurston Springer propriety software program "fund tracker" and sorted based on the custom software algorithms to determine weighted risk. Once this weighted risk is determined, Robovise will choose the exchange traded fund (ETF) and mutual fund for each asset class in a given sector. This process is continually monitored, and changes are implemented based on shifts in the market and asset class performance. These asset classes will be rebalanced based on our algorithms recommendations and activity/fluctuations/volatility in market conditions.

RISK:

Investing in securities involves risk of loss that clients should be prepared to bear. All strategies include risk that past performance is not indicative of future results. Prior to investing, it is important for you to review the materials delivered to you, including the Robovise Account Agreement, this Wrap Fee Brochure, the Supplemental Adviser Brochure, the investment prospectuses', account applications and disclosure notices, and other such documents Robovise uses to introduce the account or the products that will be bought and sold. Robovise cannot guarantee any level of performance. An investment in securities involves the potential of loss of account assets. Past performance is not indicative of future results.

For each significant investment strategy or method of analysis, there are material risks involved. The following is a summary of certain types of risks in investing:

Equity Securities Risk refers to stock markets as volatile. The price of equity securities fluctuates based on changes in a company's financial condition and overall market and economic conditions. Robovise's primary investment vehicles are exchange traded funds (ETF's) and mutual funds, these investments are designed to invest in a wide variety of companies that pertain to one asset class, thus trying to reduce the volatility of any one security.

ETF Risk: An Exchange Traded Fund of ETF is marketed security that tracks an index or a basket of assets. An ETF trades on a stock exchange like a common stock. An ETF owns the underlying shares of the assets and the divides that ownership into shares of the ETF. The ETF performance may not match the underlying assets that it's invest in exactly, due to internal expenses incurred by the ETF, external expenses (such as custodian fees, brokerage commissions, management fees of Robovise) and supply/demand.

Liquidity Risk:

Market volatility, lack of active liquid markets, and other factors, may prevent a Client from selling securities at all, or at an advantageous time or price because Robo and the Client's Broker may have difficulty finding a buyer and may be forced to sell at a significant discount to market value

Legislative & Tax Risk:

Management Risk: also called Advisory risk. Robovise makes no guarantee that the investment decisions or assets class will produce anticipated results. Since Robovise is a software based advisory service, clients may experience computer failure, no internet access, viruses or others that effect access to the Robovise service. Robovise and its employees are not responsible for client losses incurred.

Market Risk: sometimes referred to as systematic risk, involves factors that affect the overall economy or securities markets. It is the risk that an overall market will decline, bringing down the value of an individual investment company regardless of that company's growth, revenues, earnings, management and capital structure.

Selection Risk is the risk that the securities selected will underperform the markets or relevant indices.

Small Cap and Emerging Growth Securities Risk refers to small cap or emerging growth companies that may have limited product lines or markets. They may be less financially secure than larger, more established companies. They may depend on a more limited management group than larger capitalized companies. They are also subject to substantially greater volatility due to limited liquidity.

Item 9 Disciplinary Information

Disciplinary Information

The firm has no legal or disciplinary events.

Item 10 Other Financial Industry Activities and Affiliations

Robovise's portfolio managers are firm employees. The client information provided to the portfolio manager(s) includes the Portfolio and Relative Risk Model information found in the Robovise Account Agreement, client preferences and restrictions, and any other information that will be necessary to manage the account accordingly. The portfolio manager may be updated from time to time with information about the client that is pertinent to how the account is invested.

Richard Parker is registered with the SEC as an Investment Advisor Representative and holds series 7,3,24,65,66 securities licenses with FINRA. Robovise is registered with the SEC as an Investment Advisor with notice filings in the states of Indiana and Ohio. Richard (Rick) Parker is a minority shareholder and COO with Thurston Springer Miller Herd Titak, an Indiana based, LLC ("Thurston Springer") which is an (Member FINRA & SIPC) registered broker/dealer, SEC Registered Investment Advisor, an introducing broker with the National Futures Association, and an insurance agency.

Thurston Springer is securities licensed in the 50 United States and the District of Columbia in addition to being insurance licensed in multiple states. Thurston Springer as a broker dealer, has entered into a fully disclosed introducing clearing relationship with Royal Bank of Canada Correspondent Services ("RBC"), located in Minneapolis, MN. Thurston Springer instructs RBC on behalf of Robovise, to provide execution and custody services for Robovise Clients.

- Robovise does not believe these arrangements create a material conflict of interest with clients because individual Adviser Representatives do not earn commission-based-compensation on advisory accounts, and Adviser Representatives who also engage in insurance services as insurance agents are compensated separately for insurance products.
- Robovise and Thurston Springer Miller Herd & Titak (Thurston Springer) currently share the same address yet separate organizations and do not create a material conflict of interest.
- Robovise will use certain pieces of technology that Thurston Springer has created to aid in the facilitation of Robovise.
- Confidentially agreements have been signed to protect client's interest and sharing of information only for business use.

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

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

Robovise has adopted a Code of Ethics for the firm, and employees and associated persons' of the firm, describing its high standards of business conduct and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures. The Code of Ethics is designed to assure that personal securities transactions and activities of the employees and associated persons will not interfere with making decisions in the best interest of advisory clients and implementing such decisions while at the same time allowing employees to invest for their own accounts. All employees and associated persons at Robovise must acknowledge receipt of the terms of the Code of Ethics upon hire, again annually, or as amended.

- A copy of the firm's Code of Ethics will be provided upon request, at no charge.

Robovise performs similar services for other clients that it does for you, and the same securities may or may not be purchased or sold for other accounts at the same time. Robovise may give advice and/or take action in the performance of its duties to other Clients and/or may differ from advice given or the timing or nature of action taken with respect to Client. Because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics to reasonably prevent conflicts of interest between the firm and its clients.

Robovise will allocate investment opportunities believed appropriate for Client's Account and other accounts managed by Robovise among such accounts equitably and in a manner consistent with the best interests of all accounts involved. There can be no assurance that a particular investment opportunity that comes to the attention of Robovise will be allocated in any particular manner.

Material Financial Interest: Adviser will not cause accounts over which we have management authority to effect transactions in securities in which we, our affiliates and/or clients, directly or indirectly, have a material financial interest.

Certain affiliated accounts may trade in the same securities with client accounts on an aggregated basis when consistent with our obligation of best execution. In such circumstances, the affiliated and client accounts will share costs equally and receive securities at a total average price. We will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. Completed orders will be allocated as specified in the initial trade order. Partially filled orders will be allocated on a pro-rata basis. Any exceptions will be explained on the order. If there is a situation where there are multiple executions, the firm and its employees would receive the least favorable price.

Item 12 Brokerage Practices

Robovise utilizes TD AMERITRADE INSTITUTIONAL as its introducing broker-dealer for effecting transactions in client accounts and also provides clearing services, trade execution and custody services.

Robovise does not engage in any “soft dollar” practices in relation to client commission money for the receipt of brokerage services or research. Robovise pursues the “best execution” for brokerage commissions and will from time to time look to make sure the commissions paid are competitive. For definition purposes “best execution” seeks the best overall execution not necessarily the lowest cost. Some of the factors used to determine best execution are: liquidity, timing, technology and capability. Robovise will from time to time, aggregate purchase and sale orders. In the instance that this happens, an average price will be determined, and the Client will be credited or charged this price.

Item 13 Review of Accounts

The securities within the Robovise account are actively monitored. These assets are available to view via the Robovise website. Assets that are invested in the Robovise Account are rebalanced according to the model chosen. When rebalancing, tax considerations, assets class weights and general market conditions are considered.

From time to time, Client may receive email communication regarding the performance, information regarding accounts and other features available. In addition to those communications, on a quarterly basis, Robovise will communicate with its clients to review information and ask to update any changes to their financial profile. Any other Client correspondence will be handled by the Robovise staff on a case by case basis. Based on the information updated, Robovise's algorithms will determine if a change in investment objective is necessary

Robovise actively monitors the investment vehicles (primary exchange traded funds (ETF's) and mutual funds) that it client's assets are invested in and has the authority to change and/or replace assets as needed.

Item 14 Client Referrals and Other Compensation

- A. Robovise has entered into a networking arrangement whereby Robovise technology is available to clients and prospective clients of a Banking and/or Credit Union institution. The institution will receive a portion of Robovise's compensation when their members/clients are referred to Robovise. This portion of the fee paid to the financial institution is deducted from the Robovise's compensation and is not in addition to the Robovise compensation.
- B. The financial institution's individual personnel may receive a nominal fee for qualified referrals. Such compensation is not transaction related, and the amount of which is deducted from the Adviser Representative's compensation.
- C. Robovise employees have been and likely will be invited to attend educational conferences sponsored by mutual fund and/or ETF companies. The sponsoring company may reimburse and pay for the travel and other related expenses incurred by our Adviser Representatives to attend such conferences. In addition, such companies also may pay for certain expenses incurred by Adviser Representatives or the firm in connection with dinners or events for clients and other miscellaneous expenses that may be incurred in relation to the event.
- D. Robovise will from time to time run promotions campaigns to existing Clients and potential clients offering additional account services, which includes but not limited to a temporary reduction in fees, bonus or incentive. These promotions will may or may not be run by third party's entities to push new user traffic to the Robovise website.
- E. Robovise does engage solicitors who will from time to time refer Clients to Robovise.
- F. All clients will be introduced to Thurston Springer as the broker dealer. Thurston Springer will receive no direct compensation from Robovise or its clients. Thurston will merely process paperwork and trading capabilities to Robovise. In the event that the processing of business for Robovise becomes too large for Thurston Springer to facilitate, Robovise will compensate Thurston Springer for additional staff to ensure continuity of processing. Thurston may receive compensation from the spread on cash and/or margin balances that Robovise clients may maintain.
- G. All Robovise Clients will custody all assets at TD Ameritrade Institutional, Division of TD Ameritrade, Inc., member FINRA/SIPC. TD Ameritrade Institutional was chosen for its size, safety and security.

Item 15 Custody

Robovise instructs TD Ameritrade Institutional regarding the investment of the Clients accounts. Robovise does not maintain custody of any Clients funds or securities. All custody in addition to services including execution services relative to all purchases and sales transactions facilitated by TD Ameritrade Institutional. (see item10).

Robovise clients will have the capability to log into their Robovise account to view current and historical account information, performance, securities holdings, activity and transactions. All of the above-mentioned activities are reconciled with the broker/dealer and clearing firm on a consistent basis. From time to time there might be slight differences in the information due to a variety of reasons. These reasons include but limited to: corporate actions, pending transactions, dividends, cash movement or other activity. Clients will have access to the TD Ameritrade Institutional client portal where they can receive trade confirmation and monthly statements. The items received from the TD Ameritrade Institutional portal, are the official records of a Clients account.

Item 16 Investment Discretion

Robovise will have discretionary trading and investment authority over the Clients assets held with the broker. This discretionary authority is given to Robovise by the Wrap Account Agreement completed and signed by each client. Pursuant to the Robovise Wrap Agreement, the Client gives Robovise full power of attorney to decide timing, size and what securities to purchase and sell for the Client.

Item 17 Voting Client Securities and Legal Proceedings

Proxy Voting: As a matter of firm policy and practice, we do not have authority to, and do not vote proxies on behalf of Clients. Proxies and other solicitations will be provided by the custodian of the assets.

Legal Proceeding: Clients occasionally receive legal proceeding notices, including bankruptcies or class actions, involving securities held or previously held by the Account or the issuers of these securities ("Legal Proceedings"). Robovise does not offer assistance as a service provided under your Advisory Agreement.

Item 18 Financial Information

Robovise 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. This Item is not applicable because Robovise does not require or solicit the prepayment of any advisory fees and does not have any adverse financial condition that is reasonably likely to impair our ability to continuously meet our contractual commitments to our Clients.

Item 19 Robovise Wrap Fee Brochure

Adviser Representative's individual supplemental brochure should accompany this brochure. If it has been inadvertently missed, please let us know right away.



9000 KEYSTONE CROSSING, SUITE 740,
INDIANAPOLIS, INDIANA 46240
www.Robovise.com

Form ADV Part 2B

Client Brochure Supplement

August 4th, 2018

This Client Brochure Supplement give information about the qualifications and business practices of certain Robovise employees

If you have any questions about the contents of this Brochure, please contact Robovise at (317) 513-5544 or support@robovise.com . Additional information about Robovise is also available on the SEC's website at www.adviserinfo.sec.gov .

Richard Parker – born 1980

Education

BS, Indiana University – 2003

Business

2007-Present – Thurston Springer COO

2015-Present – Robovise CEO

Disciplinary Information

None

Item 1 Cover Page

Robo Wrap Account

A Wrap Fee Program

Wrap Fee Brochure

August 4th 2018

This wrap fee program brochure provides information about the qualifications and business practices of Robovise, LLC, (“Robovise”) a Registered Investment Adviser. Registration of an investment advisor does not imply a certain level of skill or training but only indicates that Robovise has registered its business with state and federal regulatory authorities. 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.

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Item 4 Services, Fees and Compensation

A. Summary of Robovise's Advisory Services

Robovise provides an automated investment service based on a Robovise client's ("Client") age and other potential risk tolerance factors to create an individualized portfolio for its Clients. Robovise has the ability to create an investment plan tailored for each Account for Clients utilizing:

- A) Proper asset allocations in which to invest
- B) Efficient assets vehicles to invest, primarily exchange traded funds (ETF's) and mutual funds
- C) Rebalancing of portfolios
- D) Tax harvesting for non-qualified accounts

B. Summary of Robovise Wrap Fee Program Fees

The Robovise Wrap Fee Program has a 0.75% annual fee, but depending on various factors, the advisory fees may be negotiable. The fees are charged on a quarterly basis in arrears. At the end of each calendar quarter the total of each account will be multiplied by the appropriate fee and then divided by 4. This fee will then be accessed and deducted from the advisory account. The fee will be deducted from the client account no later than the 20th business day of the following month. In the event that the client would terminate the agreement mid-quarter, Robovise reserves the right to charge the prorated fee at the time the termination is received. Accounts initiated during a calendar quarter will be charged a pro-rated fee.

C. Other Potential Client Fees

Advisory account fees are exclusive of transaction fees and there is a possibility for other related costs and expenses, which may be incurred by the Client. Depending on several factors, Clients may incur certain charges imposed by custodians, brokers, and third parties, such as fees charged by managers, custodial fees, odd-lot differentials, transfer taxes, postage and handling, electronic funds fees, and other fees and taxes on brokerage accounts and securities transactions. These fees are usually small and are incidental to the importance of the security being purchased or sold.

This Robovise fee is exclusive of the internal fees that exchange traded funds (ETF's) and mutual funds Companies charge to run the individual funds. The internal fees can range in price and are deduct directly out of the performance of the individual ETF. These internal expense fees are deducted directly from the ETF Company.

D. Promotional Activities and Third Party Incentives



Robovise will from time to time run paid promotional campaigns targeted towards existing and prospective Clients. These promotions may include discounts, fee reductions, additional compensation, bonus commissions, or other incentives for individuals or third party entities. These promotional activities may have influence over individuals or entities to recommend the Robovise Wrap Fee Program over other programs or services.

Item 5 Account Requirements and Types of Clients

Robovise has limited operating history and no current Clients; however, Robovise plans provide online investment advice and portfolio management services mostly to retail individuals, high net worth individuals, corporations and other business entities, corporate pension and profit-sharing plans, charitable institutions, foundations, endowments, estates and trusts. The minimum amount required to open and maintain a Robovise account is \$500. There may also be requirements around contribution of additional capital for any account below \$5000.

Item 6 Portfolio Manager Selection and Evaluation

A. Manager and Portfolio Evaluation

Robovise is an algorithm-based portfolio management service. Its software based financial advisor service can cater to the individual needs of each of its Clients. Accounts for Clients are opened and maintained according to a Client Account Agreement ("Account Agreement") which describes the specific discretionary authority that a Client grants to Robo.

To model Robovise's software based financial advisor services to each Client, Robovise uses its processes and algorithms, which are based on modern portfolio theory to access an investor's risk tolerance. Robovise asks each prospective Client questions combined with age based modeling to evaluate risk and place each client into the proper asset portfolio. There are potentially many Client based, market based, and other data points that go into evaluation of the advisor services, as well as evaluation of the Client's portfolio management. Within each asset class, Robovise uses exchange traded funds (ETF's) and mutual funds to identify and then periodically rebalance to the most appropriate exchange traded funds (ETF's) and mutual funds.

B. Potential Conflicts of Interest

Robovise's portfolio managers are firm employees. The client information provided to the portfolio manager(s) includes the Portfolio and Relative Risk Model information found in the Robovise Account Agreement, client preferences and restrictions, and any other information that will be necessary to manage the account accordingly. The portfolio manager may be updated from time to time with information about the client that is pertinent to how the account is invested.

Robovise is registered with the SEC as an Investment Advisor. Richard (Rick) Parker is a minority shareholder and COO with Thurston Springer Miller Herd Titak, an Indiana based, LLC ("Thurston Springer") which is an (Member FINRA & SIPC) registered broker/dealer, SEC Registered Investment Advisor, an introducing broker with the National Futures Association, and an insurance agency.

Thurston Springer is securities licensed in the 50 United States and the District of Columbia in addition to being insurance licensed in multiple states. Thurston Springer as a broker dealer, has entered into a fully disclosed introducing clearing relationship with Royal Bank of Canada Correspondent Services ("RBC"),



located in Minneapolis, MN. Thurston Springer instructs RBC on behalf of Robovise, to provide execution and custody services for Robovise Clients.

Robovise does not believe these arrangements create a material conflict of interest with Robovise clients. Robovise is the SEC registered Investment Advisor of Robovise clients and Robovise clients will utilize TD Ameritrade Institutional to provide custody and clearing services. Thurston Springer is an affiliate of Robovise and will provide technology and support to the clients of Robovise.

- Robovise and Thurston Springer Miller Herd & Titak (Thurston Springer) currently share the same address yet separate organizations and do not create a material conflict of interest.
- Robovise will use certain pieces of technology that Thurston Springer has created to aid in the facilitation of Robovise.
- Confidentially agreements have been signed to protect client's interest and sharing of information only for business use.

C. Tax loss optimization

Tax-loss harvesting is a technique used in non-qualifying account to lower your taxes while maintaining the expected risk and return profile of your portfolio. It harvests previously unrecognized investment losses to offset taxes due on your other gains and income. You can reinvest these tax savings to potentially grow the value of your portfolio.

D. Ongoing Risks

Robovise and its' Adviser Representatives select securities that we believe have the potential to generate a favorable return based on our perception of the associated risk, there are however many risks associated with all types of investing including the types that Robovise participates in.

RISK:

Investing in securities involves risk of loss that clients should be prepared to bear. All strategies include risk that past performance is not indicative of future results. Prior to investing, it is important for you to review the materials delivered to you, including the Robovise Account Agreement, this Wrap Fee Brochure, the Supplemental Adviser Brochure, the investment prospectuses', account applications and disclosure notices, and other such documents Robovise uses to introduce the account or the products that will be bought and sold. Robovise cannot guarantee any level of performance. An investment in securities involves the potential of loss of account assets. Past performance is not indicative of future results.

For each significant investment strategy or method of analysis, there are material risks involved. The following is a summary of certain types of risks in investing:

ETF Risk: An Exchange Traded Fund or ETF is marketed security that tracks and index or a basket of assets. An ETF trades on a stock exchange like a common stock. An ETF owns the underlying shares of the assets and the divides that ownership into shares of the ETF. The ETF performance may not match the underlying assets that it's invest in exactly, due to internal expenses incurred by the ETF, external expenses (such as custodian fees, brokerage commissions, management fees of Robovise) and supply/demand.

Liquidity Risk:

Market volatility, lack of active liquid markets, and other factors, may prevent a Client from selling her securities at all, or at an advantageous time or price because Robo and the Client's Broker may have difficulty finding a buyer and may be forced to sell at a significant discount to market value

Legislative & Tax Risk:

Management Risk: also called Advisory risk. Robovise makes no guarantee that the investment decisions or assets class will produce anticipated results. Since Robovise is a software based advisory service, clients may experience computer failure, no internet access, viruses or others that effect access to the Robovise service. Robovise and its employees are not responsible for client losses incurred.

Market Risk: sometimes referred to as systematic risk, involves factors that affect the overall economy or securities markets. It is the risk that an overall market will decline, bringing down the value of an individual investment company regardless of that company's growth, revenues, earnings, management and capital structure.

Selection Risk is the risk that the securities selected will underperform the markets or relevant indices.

Small Cap and Emerging Growth Securities Risk refers to small cap or emerging growth companies that may have limited product lines or markets. They may be less financially secure than larger, more established companies. They may depend on a more limited management group than larger capitalized companies. They are also subject to substantially greater volatility due to limited liquidity.

Item 7 Client Information Provided to Portfolio Managers

Robovise obtains information about the client only to the extent that they agree upon in the Client Account Engagement. This information is updated periodically and as reasonably agreed upon to best manage the Client Account as well as the Client's privacy.

Item 8 Client Contact with Portfolio Managers

Clients will have access to view and monitor their Accounts on Robovise.com and can contact a human representative via the contact form on Robovise.com, through email (support@robovise.com).

Item 9 Additional Information

A. Disciplinary Information

SEC registered investment advisors are required to disclose any relevant past or ongoing disciplinary events to any active or prospective Clients.

Robovise has no legal or disciplinary events to report to any Client.

B. Other Financial Industry Activities and Affiliations

Robovise's portfolio managers are firm employees. The client information provided to the portfolio manager(s) includes the Portfolio and Relative Risk Model information found in the Robovise Account Agreement, client preferences and restrictions, and any other information that will be necessary to manage the account accordingly. The portfolio manager may be updated from time to time with information about the client that is pertinent to how the account is invested.

Robovise is registered with the SEC as an Investment Advisor. Richard (Rick) Parker is a minority shareholder and COO with Thurston Springer Miller Herd Titak, an Indiana based, LLC ("Thurston Springer") which is an (Member FINRA & SIPC) registered broker/dealer, SEC Registered Investment Advisor, an introducing broker with the National Futures Association, and an insurance agency.

Thurston Springer is securities licensed in the 50 United States and the District of Columbia in addition to being insurance licensed in multiple states. Thurston Springer as a broker dealer, has entered into a fully disclosed introducing clearing relationship with Royal Bank of Canada Correspondent Services ("RBC"), located in Minneapolis, MN. Thurston Springer instructs RBC on behalf of Robovise, to provide execution and custody services for Robovise Clients.

- Robovise does not believe these arrangements create a material conflict of interest with clients because individual Adviser Representatives do not earn commission-based-compensation on advisory accounts, and Adviser Representatives who also engage in insurance services as insurance agents are compensated separately for insurance products.
- Robovise and Thurston Springer Miller Herd & Titak (Thurston Springer) currently share the same address yet separate organizations and do not create a material conflict of interest.
- Robovise will use certain pieces of technology that Thurston Springer has created to aid in the facilitation of Robovise.
- Confidentially agreements have been signed to protect clients interest and sharing of information only for business use.

C. Code of Ethics

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

Robovise has adopted a Code of Ethics for the firm, and employees and associated persons' of the firm, describing its high standards of business conduct and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures. The Code of Ethics is designed to assure that personal securities transactions and activities of the employees and associated persons will not interfere with making decisions in the best interest of advisory clients and implementing such decisions while at the same time allowing employees to invest for their own accounts. All employees and associated persons at Robovise must acknowledge receipt of the terms of the Code of Ethics upon hire, again annually, or as amended.

- A copy of the firm's Code of Ethics will be provided upon request, at no charge.

Robovise performs similar services for other clients that it does for you, and the same securities may or may not be purchased or sold for other accounts at the same time. Robovise may give advice and/or take action in the performance of its duties to other Clients and/or may differ from advice given or the timing or nature of action taken with respect to Client. Because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics to reasonably prevent conflicts of interest between the firm and its clients.

Robovise will allocate investment opportunities believed appropriate for Client's Account and other accounts managed by Robovise among such accounts equitably and in a manner consistent with the best interests of all accounts involved. There can be no assurance that a particular investment opportunity that comes to the attention of Robovise will be allocated in any particular manner.

Material Financial Interest: Adviser will not cause accounts over which we have management authority to effect transactions in securities in which we, our affiliates and/or clients, directly or indirectly, have a material financial interest.

Certain affiliated accounts may trade in the same securities with client accounts on an aggregated basis when consistent with our obligation of best execution. In such circumstances, the affiliated and client accounts will

share costs equally and receive securities at a total average price. We will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. Completed orders will be allocated as specified in the initial trade order. Partially filled orders will be allocated on a pro-rata basis. Any exceptions will be explained on the order. If there is a situation where there are multiple executions, the firm and its employees would receive the least favorable price.

D. Review of Accounts

The securities within the Robovise account are actively monitored. These assets are available to view via the Robovise website. Assets that are invested in the Robovise Account are rebalanced according to the model chosen. When rebalancing, tax considerations, assets class weights and general market conditions are considered.

From time to time, Client may receive email communication regarding the performance, information regarding accounts and other features available. In addition to those communications, on a quarterly basis, Robovise will communicate with its clients to review information and ask to update any changes to their financial profile. Any other Client correspondence will be handled by the Robovise staff on a case by case basis. Based on the information updated, Robovise's algorithms will determine if a change in investment objective is necessary

Robovise actively monitors the investment vehicles (primary ETF's) that it client's assets are invested in and has the authority to change and/or replace assets as needed.

E. Client Referrals and Other Compensation

Robovise has entered into a networking arrangement whereby Robovise technology is available the client and the prospective clients of a Banking and/or Credit Union institution. The institution will receive a portion of Robovise's compensation when their members/clients are referred to Robovise. The portion of the fee paid to the financial institution is deducted from the Robovise's compensation and is not in addition to the Robovise compensation.

The financial institution's individual personnel may receive a nominal fee for qualified referrals. Such compensation is not transaction related, and the amount of which is deducted from the Adviser Representative's compensation.

Robovise employees have been and likely will be invited to attend educational conferences sponsored by mutual fund and/or ETF companies. The sponsoring company may reimburse and pay for the travel and other related expenses incurred by our Adviser Representatives to attend such conferences. In addition, such companies also may pay for certain expenses incurred by Adviser Representatives or the firm in connection with dinners or events for clients and other miscellaneous expenses that may be incurred in relation to the event.

F. Financial Information

Robovise 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. This Item is not applicable because Robovise does not require or solicit the prepayment of any advisory fees and does not have any adverse financial condition that is reasonably likely to impair our ability to continuously meet our contractual commitments to our Clients.