

## **Part 2A of Form ADV**

### **Item 1. Cover Page**



#### **Robobroker LLC**

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#### **Client Brochure**

**This brochure provides information about the qualifications and business practices of Robobroker LLC. If you have any questions about the contents of this brochure, please contact us at [contact@robobroker.world](mailto:contact@robobroker.world). 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 Robobroker LLC also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

## **Item 2. Material Changes**

Not applicable as the brochure is filled for the first time.

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#### **Item 4. Advisory Business**

##### *A. Company description*

Robobroker LLC is registered in the State of Delaware in September, 2018. The registered agent office in the State of Delaware is: 8 The Green, Suite B, Dover, DE 19901. Principal office is: Lesnaya, 10, 1, Saburovo, Moscow province, Russian Federation. Adviser's principal owner and Executive Manager is Sergei Statsenko.

##### *B. Types of advisory services*

Adviser provides investment advice in the forms of portfolio management services and publication of newsletters containing investment recommendations. Adviser has no custody of clients' funds and securities, and manage clients' assets via third party non-affiliated brokerage firms. Investment advice is provided in respect of limited types of securities, including: government bills, notes, bond, corporate bonds, ordinary and preferred equities, exchange traded funds, real estate investment trusts, derivatives. Adviser doesn't invest into securities issued by entities which have an adverse social and environmental impact (armor, gambling, alcohol, recreational cannabis, etc.).

##### *C. Tailored Services and Investment Restrictions*

Investment advice is provided through model portfolios tailored to specific client needs (risk tolerance, investment objectives, investment horizon). Client himself choose a suitable model portfolio or take a counsel with Adviser to determine an appropriate portfolio. Clients may impose restrictions on investing in certain securities or types of securities.

Client in its own discretion open an appropriate type of an account from the variety of accounts suitable for client's investment purposes: individual, joint, taxable, tax-advantaged, cash or marginal and other types of accounts available at broker. Client may allow a trading authority to Adviser, to enable Adviser to make transactions in client account or client can subscribe for an Adviser's newsletter and manage portfolio himself in accordance with the Adviser's recommendations.

##### *D. Wrap fee programs*

Adviser does not participate in a wrap fee programs providing portfolio management services.

##### *E. Amount of assets*

Adviser is newly established and at the date of the brochure filling has no assets under management.

#### **Item 5. Fees and Compensation**

##### *A. Advisory fees*

Adviser is compensated for advisory services by charging an annual fee of 0.35% on the net market value of a bond portfolio (portfolio bond constituent) and 0.65% on the net market value of a stock portfolio (portfolio stock constituent) of a client account managed by Adviser. Fee is calculated by the end of each month. Newsletters' charge is \$250 per year. Third party brokerage commission is charged by the broker separately. Adviser can negotiate or reduce advisory fees for certain client accounts. Advisor does not charge any other fees.

### *B. Payment of fees*

Adviser bills fees to clients on a monthly basis. Advisory Agreement may stipulate that Adviser may deduct advisory fees directly from client's account.

### *C. Other fees*

Brokerage fees are separately charged and deducted by the broker from the client account. Brokerage compensation include transaction and custody fees. Broker may require compensation for another types of services such as research, market data, trading software, etc.

## **Item 6. Performance-Based Fees and Side-By-Side Management**

Adviser does not charge performance-based fees. Clients are only charged an advisory fee as disclosed in Item 5.

## **Item 7. Types of Clients**

Adviser provides investment advice and portfolio management services to individual investors, business entities, institutional investors, charitable organizations. The minimum account amount required for portfolio management services is \$10,000.

## **Item 8. Methods of Analysis, Investment Strategies and Risk of Loss**

### *A. Methods of Analysis and Investment Strategies*

Adviser uses technical and fundamental analysis in formulating investment advice and managing assets. Technical analysis used to determine the trends to follow it in a trading strategy. Fundamental analysis covers top-down and bottom-up analysis. Top-down analysis review basic economic factors: business cycles, monetary and fiscal policies (e.g., interest rates, taxation), economic indicators (e.g., GDP, employment, price indices, etc.). Bottom-up method apply to individual stock and include review of specific fundamental parameters: price chart performance, price volatility, company's type of activity, range of products and services company produce, sectorial leadership and competitiveness, financials, valuation metrics. Bonds additionally are analyzed by: credit rating, creditworthiness, yield curve performance.

Adviser deploys several investment strategies, which are distinct by risk, return and investment horizon and aimed to meet the needs of clients with different profile. Adviser mostly uses tactical asset allocation in conjunction with a buy-and-hold approach for a long-term investment strategies.

Adviser tries to time the market to generate higher than average market return. Stocks are not bought for a client simply when such asset class is appropriate for client's profile. Economy cycles, market condition, anticipated events are taken into consideration before making a decision.

### *B. Risk of Loss*

Risk controls, reducing potential losses, include: portfolio diversification (large amount of assets are not invested into a single security), stop-loss and take-profit orders are used to minimize losses and book a profit in case of trading strategies, market-timing (stocks are bought at recovery upon market corrections).

Investments into securities involve risk of loss that client should be prepared to bear. Some securities and investment strategies bear significant risk of loss, but adviser aimed to control and minimize the risk.

Strategies using investments into options involve risk of losing of all funds. Derivative portfolio include strategy of buying volatility in case of anticipated market downturn. Volatility buying assumes buying of options, that is less risky than selling of options, and can result in only loss of money invested into options.

Strategies using investments into futures involve risk of losing a significant amount of funds due to leverage. Futures portfolio strategy assumes opening long/short positions on single stocks and market indices.

Strategies using leverage (marginal accounts) bear substantial risk of loss of all funds.

#### **Item 9. Disciplinary Information**

Adviser has not been subject to any legal and disciplinary events.

#### **Item 10. Other Financial Industry Activities and Affiliations**

Not applicable as adviser and its management persons are not registered or pending to register in another financial activities, and have no relationship with any related persons among broker-dealers, investment companies, lawyers, consultants and other financial institutions.

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

A. Adviser maintains a code of ethics that requires directors, officers and employees to conduct themselves with the highest standards of honest and business ethics. Adviser has a fiduciary role to clients and acts in the client's best interests.

Adviser monitors supervised persons' personal securities trading to avoid conflict of interest. Conflict of interest is minimized due to investments mainly in a highly liquid securities. Adviser's employees may personally invest in securities recommended by Adviser and may not use material, non-public information obtained during their work to benefit from trading securities.

A copy of Adviser's code of ethics is available to clients and prospective clients upon request.

B. Adviser or a related person does not practice to recommend to clients, or buys or sells for client's account, securities in which adviser or a related person has a material financial interest.

C. Conflict of interest arising when Adviser or a related person invest in the same securities (or related securities, e.g., warrants, options or futures) that adviser or a related person recommends to clients, has no material impact on client accounts as Adviser mainly invests and recommends highly liquid securities, and the amount of Adviser' own and client transactions cannot impact the price of the security.

D. Conflict of interest arising when Adviser or a related person recommends securities to clients, or buys or sells securities for client accounts, at or about the same time that adviser or a related person buys or sells the same securities for its own (or the related person's own) account, solved by executing client transactions prior to Adviser's transactions.

#### **Item 12. Brokerage Practices**

A. Adviser cooperates with brokers that meet the following requirements: well-known name, long period of operation, investment grade credit rating, low commission, best price execution, client accounts are protected by Securities Investor Protection Corporation ("SIPC").

### *1. Research and other Soft dollar benefits*

Adviser doesn't receive research or other products or services other than execution from a broker-dealer or a third party in connection with client securities transactions ("soft dollar benefits").

### *2. Brokerage for Client Referrals*

Adviser doesn't receive client referrals from a broker-dealer or third party by selecting or recommending broker-dealers to clients.

### *3. Directed Brokerage*

Client can direct adviser to execute transactions through a specified broker-dealer. Such practice can be accomplished in case if a broker satisfies adviser's requirements in respect of reliability, client account protection, favorable price execution. By directing brokerage client may pay higher commission to selected broker.

## **Item 13. Review of Accounts**

Adviser periodically (at least monthly) review client accounts to rebalance portfolios, invests additional funds, reinvests coupons and dividends and verify that current portfolio allocation and strategy conforms to client's initially stated or revised risk profile and objectives.

Clients can access their account information by logging into personal account at broker's website or trading platform. Clients also receive from adviser periodic e-mail communications describing portfolio performance, proceedings and account information.

## **Item 14. Client Referrals and Other Compensation**

A. Third parties do not provide an economic benefit to Adviser for providing investment advice or other advisory services to Adviser's clients.

B. Adviser and its related person do not directly or indirectly compensate any person who is not Adviser's supervised person for client referrals.

## **Item 15. Custody**

Adviser does not have custody of client funds and securities. Clients receive account statements from the broker where the client account is open. Clients should carefully review those statements.

## **Item 16. Investment Discretion**

Adviser requires clients to conclude an Advisory Agreement and provide trading authority in case of advisory services assuming management of client assets. Under the terms of the Advisory Agreement, Adviser assumes discretionary authority over client assets in accounts managed by Adviser. This means that Adviser is given full discretionary authority to determine the timing, size, and securities to buy and sell for client in accordance with the model portfolio selected by client. Client can terminate advisory services and discretion authority at any time by withdrawing the trading permission. Securities and funds are withdrawn in accordance with the broker rules.

**Item 17. Voting Client Securities**

Adviser does not have or accept authority to vote client securities. Clients can obtain their voting proxies directly from the broker.

**Item 18. Financial Information**

A. Adviser's balance sheet is not applicable as Adviser does not require clients to make a prepayment in fees.

B. Adviser's financial condition is reasonably unlikely to impair Adviser's ability to meet contractual commitments to clients.