

# Form ADV Part 2A

Investable Wealth Management, Inc.

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This Brochure provides information about the qualifications and business practices of Investable Wealth Management, Inc. If you have any questions about the contents of this Brochure, please contact us at Investable Wealth Management, Inc., 245 Thruston Boulevard West, Dayton, OH 45419 or by calling 937-369-9275. 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.

Investable Wealth Management, Inc. is registered as an investment adviser with the SEC and additional information about the firm also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Registration with the SEC alone does not imply a certain level of skill or training.

## **Item 2 – Material Changes**

Investable Wealth Management, Inc. is a newly registered investment adviser and has not made any prior filings. Accordingly, there are no material changes made to this Brochure.

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## Item 4 – Advisory Business

### The Company

Investable Wealth Management, Inc. (“Investable”) is a Delaware corporation. Nick Schubert is the majority owner of Investable Wealth Management. Investable’s principal place of business is located in Dayton, Ohio. As of October 30, 2024, Investable had no assets under management.

Investable is an automated investing application that allows clients to link their payroll account to an Alpaca Securities LLC brokerage account and Investable will invest such amounts pursuant to an investment strategy that tracks Investable model portfolios designed for different investment profiles. Investable’s 5-minute signup process makes “out of sight, out of mind” investing convenient and affordable. Investable’s mission is to make saving and investing easily accessible and affordable.

Investable applies a screening process to narrow the universe of thousands of exchange traded funds (“ETFs”) to identify investment opportunities which demonstrate attractive characteristics such as competitive fees, economies of scale, strong historical track record, compelling investment philosophy, and quality of management team which are then included in the Investable model portfolios. With a goal of achieving competitive risk-adjusted returns over the long term, Investable constructs investment portfolios consisting of both passive index funds and actively managed ETFs. With an emphasis on diversification, Investable pre-designs both global equity and fixed income portfolios consisting of multiple investment styles, characteristics, and a range of market capitalizations. Using traditional asset allocation techniques, these curated equity and fixed income portfolios are combined to create various mixes of each asset class, plus cash. Depending on factors such as risk tolerance, time horizon, and investing preferences, Investable will recommend, clients may select, one of the curated model portfolio strategies based on the asset allocation that best fits their goals (i.e., conservative, moderate, aggressive). When a client selects a particular Investable model portfolio strategy, Investable will manage that client’s account consistent with the chosen model portfolio. Investable’s portfolios are not available from other brokers or agents; however, that the individual ETFs that comprise any portfolio may be available from other brokers or agents that are not affiliated with Investable.

One of the key differentiators of Investable is its onboarding process. As a payroll-linked automated investment application, when customers sign up they instantaneously connect their payroll to their Investable investment account. Once the client designates a predetermined contribution amount, this amount will be automatically deposited into the client’s account from their paycheck each pay period moving forward until the client makes a change to his or her election. Investable directs Alpaca to purchase securities consistent with the Investable model portfolio selected by the client. Clients may change their contribution amount at their discretion.

Investable actively monitors and adjusts its model portfolios. This includes activities such as ongoing due diligence of invested funds and due diligence of non-invested funds that Investable may consider a suitable or superior replacement to invested funds. Investable also continually monitors client accounts and will reallocate client accounts consistent with any changes in the Investable model portfolio associated with the client account.

As part of Investable's mission to encourage individuals to overcome barriers to investing and save more, the Company's website will include various educational content. This content may include blog posts, video and audio recordings, podcasts, and links to company-vetted social media channels.

## **Item 5 – Fees and Compensation**

The primary form of advisory compensation received by Investable is the \$9.99 per month subscription fee that is paid directly to Investable, generally through the client's automatic payroll deduction.

Monthly subscription fees are not negotiable. Stated monthly subscription fees are automatically deducted from the client's paycheck through the client's employer's payroll provider. Payroll deductions related to the subscription fee will be adjusted so that the monthly fee is taken out in equal installments which reflect the manner in which the client is paid, be that weekly, bi-weekly or monthly.

Any client may terminate its subscription to Investable on thirty (30) days prior written notice to Investable; provided, however, that Investable will not refund or otherwise pro-rate any subscription payment made during any month in which a subscription is terminated and the client must pay, in full, the amount of each monthly subscription for any month that a subscription is outstanding.

Clients will incur other transaction costs of \$0.0025 per share per transaction conducted through Alpaca Securities and may incur other fees that are charged by the ETFs or other securities in which the client's account is invested. Transaction costs are rounded up to the nearest whole cent per transaction, per individual order. Investable will periodically review to confirm that the fees charged by Alpaca Securities are reasonable with respect to Investable's clients and to the extent that Investable believes that the Alpaca fees are not appropriate will communicate such findings to its clients and work with its clients as appropriate to obtain best execution.

Investable receives no loads, 12b-1 or other account servicing fees from any fund or investment manager, nor any portion of any of the fees and charges referred to above.

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

Investable does not charge any performance-based fees.

## **Item 7 – Types of Clients**

Investable provides investment management services directly to its clients. Clients generally are individuals who access the Investable investment platform by directly signing up on the Investable website and/or application. Investable requires an initial account size of at least \$50.

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

### **Strategy**

*Overview.* Investable’s goal is to help its clients make investing “out-of-sight” and “out-of-mind” via each client’s automatic payroll deductions while addressing the client’s investment objectives and risk tolerance through informed selections of investment portfolios. To meet this goal, the Company offers a wide array of curated model investment portfolios across the equity and fixed income universe:

*Passive Equity and Fixed Income Strategies:* Investable’s passive strategies are composed of index funds that track major global financial market benchmarks. Such benchmarks include indices such as the S&P 500, Russell 1000, Russell 2000, MSCI All-Country World ex-USA, and the Bloomberg US Aggregate Bond. As most index funds are mandated to track their respective benchmarks, both the individual passive ETF components and the passive portfolio in aggregate are assessed based on quantitative metrics such as assets under management (“AUM”), expenses, trading liquidity, and tracking error relative to a designated benchmark. Other factors may also influence the assessment of these funds including reputation of the fund company and investment manager, longevity of the fund, manager experience, and trading accessibility.

*Active Equity and Fixed Income Strategies:* Investable’s active strategies are composed of ETFs that are actively managed by institutional fund managers. These fund managers often have a mandate to provide above risk-adjusted, average returns relative to the benchmarks stated in their respective fund prospectuses. Investable assesses active ETFs based on quantitative metrics such as risk-adjusted returns, portfolio composition, relative performance compared to the benchmark and competitors, active share, and long term performance track record. Compared to passive alternatives, the due diligence process for active funds place a higher emphasis on qualitative metrics such as investment philosophy and process, adherence to stated investment objectives and styles, quality of firm and management team, and ability for fund managers to articulate strategy performance. As actively managed ETFs are a relatively newer investment vehicle, Investable may assess a fund manager’s performance and track record in tandem with a mutual fund and/or separately managed account that has been managed in a comparable strategy.

*Balanced Portfolios:* Using Investable's passive and active equity and fixed income strategies, Investable will offer balanced portfolios of various asset allocations based on criteria such as risk tolerance, time horizon, and investment goals and preferences. Each balanced portfolio will have a target asset allocation, be monitored on an ongoing basis, and will undergo rebalancing when portfolio weights have drifted past target allocation bands.

*Method of Analysis:* Investable analyzes and manages its interested funds and portfolios across all phases of the investment process including preliminary due diligence, comparative analysis of prospective and current investments, implementation, ongoing monitoring, and portfolio reoptimization. Investable uses institutional research tools and software to perform portfolio analysis inclusive of dynamic screens and fund watchlists, portfolio risk-return reports (e.g., Sharpe Ratio, upside and downside capture, relative performance), performance attribution, and returns- and holdings-based analysis. These tools will be supplemented by publicly available data sources (e.g., macroeconomic data), various third-party research materials, periodic manager commentary, and investment conferences and webinars hosted by reputable independent third parties. Using these resources, Investable designs its model portfolios based on forward-looking capital market assumptions, which may include dynamic asset allocation and funds that periodically remove then current fund managers and replace them with fund managers that have investment objectives that more closely align to the fund's stated investment strategies.

## **Principal Investment Risks**

*Equity and Fixed Income Security Risk:* Investing in securities involves risk of loss that clients should be prepared to bear. While Investable's focus on ensuring that the client's risk-tolerance is appropriately reflected in the ETF portfolios that are made available to each client, the volatile nature of securities markets will expose client portfolios to downside as well as upside potential.

*Stock Market Fluctuations:* With a substantial portion of client assets invested in individual stocks, or exchange-traded funds that hold stocks, clients are exposed to the risk of significant declines in value at times as global stock markets fluctuate in response to changes in economic, geopolitical, regulatory and other factors. While Investable attempts to mitigate these declines by primarily investing in what is believed to be high-quality equities with attractive long-term prospects, clients are nonetheless exposed to this inherent equity market volatility. Also, while Investable maintains a diversified portfolio of securities, individual sectors, industries and stocks can also be exposed to specific risks due to unforeseen events.

*International Investment Risks:* International stocks and bonds have often experienced more volatility than US markets in periods of global market upheaval as a result of factors including currency fluctuations, differing tax, regulatory and accounting practices, less mature or sophisticated markets, or unpredictable international events. While Investable attempts to

mitigate these risks by holding diversified stock and bond funds in addition to individual issues, in periods of increased volatility clients may be exposed to potential losses.

*Volatility in Fixed Income Investments:* Bonds, bond funds and other fixed income investments are sensitive to various factors, including fluctuations in the global bond markets in response to changes in economic, geo-political, regulatory and other factors. In addition, changes in the level of US and global interest rates or the slope of the interest rate curve, as well as the rise and fall of the yield spread between US Treasuries and more risky fixed income securities, can cause fluctuations in underlying bond prices. Specific risks related to the management of a bond fund, or the liquidity of bonds in general during volatile periods in the markets, can also affect bond prices. Further, doubts about the ability of the issuer of the underlying bond to make interest and principal payments, or actual default on such payments, can cause bond prices to fall. While Investable attempts to mitigate these risks by holding diversified bond funds in addition to what are expected to be high quality individual issues, in periods of increased volatility or inflation clients are exposed to potential losses.

## **Item 9 – Disciplinary Information**

Registered investment advisors are required to disclose all material facts regarding any legal or disciplinary events that would be material to a client’s evaluation of the firm or the integrity of the firm’s management.

Investable is not aware of any events of this nature, material or otherwise, involving the firm or any of its staff.

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

None.

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

Investable has adopted a Code of Ethics. This Code of Ethics sets forth (i) fundamental standards of conduct and legal compliance for Investable and its personnel, (ii) policies and procedures for the protection of material nonpublic information, and (iii) internal reporting of violations of the Code of Ethics and securities laws. The Code requires Investable personnel to adhere to their fiduciary duties to clients, to avoid conflicts of interest, and to certify their compliance with its provisions to Investable.



Each employee that is designated as an “Access Person” must obtain preclearance of personal transactions in securities, subject to certain exceptions in cases where there is no risk of harm to client interests. Investable may deny, revoke, or impose conditions on preclearance of any proposed transaction if it would be, or would appear to be, inconsistent with the legal or fiduciary obligations of Investable or its personnel.

Subject to the preclearance requirement, Investable and its related persons may buy or sell the same ETFs and other securities for their personal accounts that are purchased for or recommended to clients. The nature and timing of such investment actions may differ from investment actions taken on behalf of clients, depending on the respective individual circumstances or investment goals and strategies. In general, with respect to relatively liquid securities (that is, securities that are widely held and traded in institutional markets), the firm and its related parties may trade in the securities held in client accounts even while recommending such securities to clients. Considering the type and volume of securities that we manage we do not believe that such trading could have any appreciable impact upon prices.

In order to comply with its legal and fiduciary duties and to avoid conflicts of interest, it is the policy of Investable that personnel must comply with applicable federal and state law and that neither the firm nor any related person may use confidential information about client accounts in making personal transactions, or take personal advantage of investment opportunities that properly belong to clients; or act on the basis of material, nonpublic (inside) information about the issuer of a security in taking investment action for either client or personal accounts, even if that would benefit the account.

Investable Access Persons are required to disclose all personal transactions to the firm. In addition, Access Persons must (i) report quarterly on their personal securities transactions and (ii) report annually on their personal securities holdings to Investable’s Chief Compliance Officer or other designated person(s). The Code of Ethics requires the Chief Compliance Officer to review these reports in monitoring trades or patterns of trading by Investable’s Access Persons.

Investable periodically provides training and education programs to its Access Persons regarding the Code of Ethics and applicable laws. Investable’s senior management periodically reviews the effectiveness of the Code of Ethics for any apparent conflicts of interest between personal and client matters or between the affairs of different clients. Investable will provide a copy of its Code of Ethics to any client or prospective client upon request.

## **Item 12 – Brokerage Practices**

### **Broker Selection and Commissions**

Investable has selected Alpaca Securities LLC to serve clients as broker-dealer. Investable will at all times endeavor to select those broker-dealers that will provide the best services and execution. The Company assesses the reasonableness of commissions charged on an ongoing basis. Generally, the helpfulness of the brokerage house and the efficiency of its operations and execution are important elements in determining where business is placed, and all brokerage is placed at comparable rates to those offered by other brokerage houses that could perform like services for the client. Investable reviews its brokers annually.

### **Item 13 – Review of Accounts**

Investable reviews client accounts on a regular basis to confirm that they are allocated in accordance with the selected model portfolio. In addition to periodic account reviews, Investable will review each client account in the event that an associated model portfolio is updated. Investable will also reallocate and rebalance client accounts consistent with predetermined thresholds set forth in the models.

Investable has a client services team to address technical issues that clients may encounter in accessing their accounts and updating information.

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

Investable does not compensate any employee, client or outside party for client referrals nor provide any other economic benefit that arises as a result of Investable's relationship with any employee, client or outside third party.

### **Item 15 – Custody**

Investable does not serve as a custodian for any client assets. Thus, our clients retain a third-party custodian to serve in this role on their behalf. The custodian must be a bank, broker-dealer, or other qualified institution.

We generally have the ability to deduct advisory fees directly from client accounts. In general, clients receive account statements from the custodian of their assets (a bank, broker-dealer or other qualified custodian) on a monthly basis. Certain custodians will send statements quarterly if there is little or no activity in an account.

Clients receive statements from us on a quarterly basis, or as otherwise agreed upon between us and the client. We encourage our clients to compare the account statements

received from the custodian with those received from us to ensure that all account transactions are accurate.

#### **Item 16 – Investment Discretion**

Investable will have discretionary authority over client accounts established with Investable. As part of this discretionary authority, Investable will periodically rebalance client accounts to remain consistent with the model portfolio selected by such client. In addition, from time to time, Investable may make changes to its model portfolios. In such event, Investable will reallocate any impacted client account to conform to the updated model portfolio. See Item 4 – Advisory Business.

#### **Item 17 – Voting Client Securities**

Investable does not and will not accept authority to vote client securities. Client's will receive their proxies and other solicitations directly from their custodians. Investable will not respond to and does not provide any information to clients regarding any solicitation that any clients may receive.

#### **Item 18 – Financial Information**

Investable is not aware of any financial condition that is reasonably likely to impair its ability to meet contractual and fiduciary commitments to clients and has not been the subject of a bankruptcy proceeding.