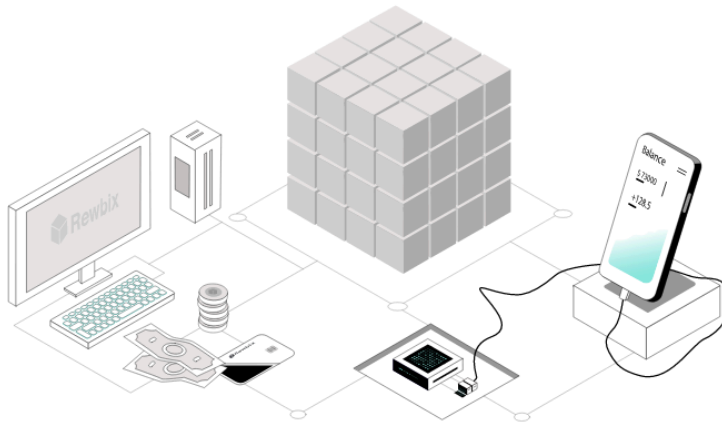


Item 1. Form ADV Part 2A Appendix 1

Wrap Fee Brochure



17350 State Hwy 249, Ste 220
Houston, Texas 77064
Phone: 650-309-9099
Website: www.rewbix.com
Email: support@rewbix.com

Date: March 12, 2024

This Wrap Fee Program brochure provides information about the qualifications and business practices of Rewbix AI Investments LLC (hereinafter, “we,” “our,” the “Firm” or “Rewbix”). If you have any questions about the contents of this brochure, please contact us at 650-309-9099 or email us at support@rewbix.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 Rewbix also is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2. Material Changes

As this is the first edition of our Wrap Fee Program Brochure, there are currently no material changes to report. We are committed to keeping our clients informed about any future material changes to the program, and we will promptly update this section to reflect such changes when they occur. Our priority is to provide transparent and accurate information to our clients, ensuring their understanding and confidence in our services.

We may, at any time, update this Disclosure Brochure and send a copy to you with a summary of material changes, or send you only a summary of material changes that includes an offer to send you a copy of the full brochure either by electronic means (email) or in hard copy form.

Please feel free to reach out to us if you have any questions or require further details about our Wrap Fee Program by emailing us at support@rewbix.com or contacting us by phone at 650-309-9099. We value your trust and strive to deliver the highest standards of service and compliance to meet your investment needs.

Item 3. Table of Contents

Item 1. Form ADV Part 2A Appendix 1

Item 2. Material Changes

Item 3. Table of Contents

Item 4: Advisory Business

A. Description of Advisory Business

B. Types of Advisory Services Offered

C. Fees and Compensation

D. Custody and Brokerage Services

E. Discretionary Authority and Fee Withdrawal Authorization

Item 5. Performance Based Fees and Side-By-Side Management

A. Performance Based Fees

B. Side-By-Side Management

C. Conflict of Interest

D. Proxy Voting

Item 6: Account Requirements and Types of Clients

A. Account Requirements

B. Types of Clients

Item 7: Methods of Analysis, Investment Strategies, and Risk of Loss

Item 8. Client Information provided to Portfolio Managers

Item 9. Client Contact with Portfolio Managers

Item 10. Disciplinary Information

Item 11. Other Financial Industry Activities and Affiliations

Item 12. Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

A. Proprietary Trading

B. Participation or Interest in Client Transactions

Item 13. Brokerage Practices

A. Broker-Dealer Recommendation

B. Research and Other Soft Dollar Benefits

C. Brokerage for Client Referrals

D. Directed Brokerage

E. Aggregate Orders

Item 14. Review of Accounts

Item 15. Client Referrals and Other Compensation

Item 16. Custody

Item 17. Financial Information

Item 4: Advisory Business

A. Description of Advisory Business

Rewbix AI Investments LLC ("Rewbix"), an internet advisor offering personalized investment advisory services through its interactive website and platform. The company was formed in 2022 as a Limited Liability Company in Texas and is currently owned by Rewbix Inc., which is, in turn, owned by Devang J. Patel.

As an AI-powered platform, Rewbix tailors investment advice to individual client needs. During registration, clients are requested to complete a detailed questionnaire to provide essential information, enabling Rewbix to understand their financial goals, risk tolerance, and investment preferences. This personalized approach helps us create tailored investment strategies for each client.

B. Types of Advisory Services Offered

Rewbix offers a wide range of investment advisory services tailored to meet clients' unique needs. Our services include:

1. Portfolio Management: We design and manage customized investment portfolios using sophisticated AI algorithms, aligning with individual financial goals and risk profiles.
2. Risk Mitigation: Leveraging machine learning and quantitative analysis, Rewbix identifies investment opportunities with high-return potential while managing and mitigating portfolio risk.
3. Dividend Reinvestment: Dividends received in client accounts are automatically reinvested in top-performing stocks, unlocking compounding growth potential.
4. Diversification Strategies: We employ diversification strategies to minimize concentration risk and achieve a well-balanced investment approach.
5. Regular Account Review: Ongoing account reviews ensure investments remain aligned with clients' evolving financial objectives and risk tolerance.

C. Fees and Compensation

Rewbix offers a comprehensive Wrap Fee Program that includes a transparent fee structure covering investment advisory services, trading, custody, and related support services. Our program offers clients a hassle-free fee management experience.

Under the Wrap Fee Program, retail clients are charged a management fee of 2% annually, payable at the beginning of each month in arrears. Qualified investors and accredited investors

may also incur a performance fee of up to 20% in addition to the management fee of 2%. To provide clarity on our fee structure, please refer to the wrap fee schedule table below:

Type of Fee	Retail Investors	Accredited Investors	Qualified Clients
Management fee	Up to 2% annually	Up to 2% annually	Up to 2% annually
Performance fee	None	Up to 20%	Up to 20%

As of 3/12/2024, Rewbix manages client assets totaling \$100,000, rounded to the nearest \$100,000.

D. Custody and Brokerage Services

To ensure the safety and security of client assets, Rewbix utilizes Interactive Brokers LLC ("IBKR") as a qualified custodian and brokerage. IBKR provides independent custody services, safeguarding client securities and assets. IBKR agrees to provide detailed custodial statements at least quarterly directly to the client showing all disbursements from the account, ensuring transparency and confidence in asset protection. IBKR is currently integrated with the following custody banks:

- Bank of New York
- Fifth Third Bank
- Huntington Bank
- Northern Trust
- J.P. Morgan
- State Street Bank
- UMB Bank
- US Bank

E. Discretionary Authority and Fee Withdrawal Authorization

During registration, clients grant Rewbix discretionary authority over their accounts at IBKR. This allows Rewbix to make investment decisions on behalf of clients, including buying and selling securities, without requiring prior approval for each transaction.

Clients also authorize Rewbix to withdraw advisory fees as outlined in the Wrap Fee Program. The management fee of 2% is deducted at the beginning of each month, streamlining fee processing for clients. Clients also have the option of paying this fee by credit card.

Item 5. Performance Based Fees and Side-By-Side Management

A. Performance Based Fees

We offer performance-based fees exclusively for accredited and qualified investors, ensuring a tailored and aligned approach to investment management. Our commitment to transparency drives us to address potential conflicts of interest that may arise from managing various account types concurrently.

B. Side-By-Side Management

Our AI-driven algorithms are designed to provide consistent and unbiased investment recommendations tailored to each client's investment objectives and risk tolerance. While some accounts are subject to performance-based fees in addition to our wrap fee program which can be considered a conflict of interest, our technology remains focused on delivering objective advice and strategic adjustments based on data-driven analysis, rather than fee structures in order to mitigate this risk.

C. Conflict of Interest

Our approach mitigates any conflicts of interest by prioritizing personalized strategies for each client, regardless of fee arrangement. With our robust AI technology as the driving force behind our advisory services, we maintain a steadfast commitment to delivering outcomes that genuinely serve the best interests of all our clients.

D. Proxy Voting

Rewbix does not engage in proxy voting on behalf of clients. Our clients retain the responsibility of directing their own proxies solicited by securities issuers. Clients are accountable for making decisions related to matters like mergers, acquisitions, tender offers, bankruptcy proceedings, and other events concerning the securities in their accounts. Proxy and solicitation information will be communicated to clients directly, typically through the designated custodian. Clients are advised to follow the provided instructions for proxy voting as outlined in the received communication. We kindly request clients not to contact us with inquiries regarding specific solicitations and instead refer to the provided guidance for proxy voting procedures.

Item 6: Account Requirements and Types of Clients

A. Account Requirements

To benefit from our tailored investment advisory services, clients are required to meet certain criteria. Clients must:

1. Be at least 18 years of age.
2. Complete the registration process on the Rewbix platform, providing accurate and up-to-date personal and financial information.
3. Agree to the terms and conditions outlined in the investment advisory agreement.
4. Provide the necessary information for account funding and setup, including a linked bank account.
5. Clients must have an account minimum of \$50.

B. Types of Clients

Rewbix caters to a diverse range of clients seeking personalized investment strategies and portfolio management. Our services are designed for:

1. **Individual Investors:** Clients looking to achieve their personal financial goals, build wealth, and secure their financial future.
2. **Qualified Investors:** Accredited investors and high-net-worth individuals seeking advanced investment strategies and personalized portfolio management.
3. **Retail Investors:** Individuals interested in an effortless investment experience with the benefits of AI-driven portfolio management.
4. **Long-Term Investors:** Clients with a long-term investment horizon who seek to capitalize on compounding growth potential and market opportunities.

Item 7: Methods of Analysis, Investment Strategies, and Risk of Loss

1. Rewbix leverages cutting-edge AI technology to provide personalized investment advice through our interactive website. Clients complete a comprehensive questionnaire to determine their risk tolerance and investment preferences. Our AI algorithms utilize this data to create customized portfolios predominantly comprising stocks that align with client-stated preferences and objectives.

It's crucial to recognize that while our AI technology strives to align with client goals, market conditions and inherent risks can influence its decisions. There is a possibility that the technology's actions may not precisely mirror those goals due to the dynamic nature of markets and the need for risk mitigation. This scenario may lead to decisions that prioritize risk management over aggressive or speculative trading, even when a client's preference is different.

2. Our investment strategy revolves around crafting portfolios tailored to individual risk profiles and financial objectives. It's important to acknowledge that investing in securities carries inherent risks. Clients must understand that our AI's data-driven decisions stem from risk management principles and data analysis. Nonetheless, investing inherently involves the potential for financial loss due to market volatility, unforeseen events, and other factors. Frequent trading, if pursued, can also amplify brokerage and transaction costs that affect overall performance.

3. In light of our focus on individual stock selection, it's imperative to inform clients about the inherent risks associated with investing in specific securities. Stock performance is influenced by diverse factors, including market volatility, company dynamics, industry trends, and broader economic conditions. While our AI technology strives to optimize stock choices according to individual risk tolerance, clients should be well-informed about the potential risks tied to their chosen investment types.

In conclusion, our AI technology tailors investment advice based on client risk profiles, but it's important to understand that AI is fundamentally a software technology. Its decisions may not always align seamlessly with an investor's goals due to market dynamics and inherent risks. Clients should approach investments with awareness that strategies involve inherent market risks.

Item 8. Client Information provided to Portfolio Managers

Rewbix manages all client accounts directly and does not share client information with other portfolio managers.

Item 9. Client Contact with Portfolio Managers

At Rewbix, investment advice is exclusively provided through our website Rewbix.com. While clients can engage with Rewbix via Rewbix.com, direct contact with our portfolio managers for investment advice is not available. For technical and customer service matters, you can reach us at support@rewbix.com. Please note that this email is not intended for investment advice inquiries.

Item 10. Disciplinary Information

Rewbix is required to disclose any legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of your management. Rewbix does not have any disclosures to report under this item.

Item 11. Other Financial Industry Activities and Affiliations

Rewbix AI Investments LLC operates as a subsidiary of Rewbix Inc. Similarly, Rewbix Capital LLC is also a subsidiary of Rewbix Inc. and is in the application process to function as a funding portal.

Rewbix does not have a related person that is:

- A broker/dealer, municipal securities dealer or government securities dealer or broker
- An investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company)

or “hedge fund,” and offshore fund)

- An investment adviser or financial planner
- A futures commission merchant, commodity pool operator or commodity trading Advisor
- A banking or thrift institution
- An Accountant or accounting firm
- A lawyer or law firm
- An insurance company or agency
- A pension consultant
- A real estate broker or dealer
- A sponsor or syndicator of limited partnerships.

Item 12. Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Rewbix, along with its management and supervised team members (collectively referred to as "personnel"), is dedicated to upholding a stringent Code of Ethics. This code aligns seamlessly with the regulatory requirements of the investment advisory landscape, emphasizing the firm's fiduciary duty to prioritize clients' interests above all. Our commitment to integrity ensures that clients' welfare remains paramount.

At Rewbix, we have established a comprehensive Code of Ethics that adheres to regulatory guidelines. This code serves as a guiding principle for our personnel, underscoring their unwavering commitment to clients' well-being and maintaining the highest ethical standards in every interaction and transaction. This comprehensive code outlines prohibited transactions, reporting obligations, and procedures for enforcing compliance in personal transactions conducted by our personnel, all aimed at preventing conflicts of interest.

The tenets of our Code of Ethics span various aspects, including professional standards, insider trading, personal trading, gifts, entertainment, and fiduciary responsibilities. It encapsulates our core values of transparency, integrity, honesty, and trust. If requested, we are more than willing to provide clients and prospective clients with a full copy of our Code of Ethics, underscoring our dedication to ethical conduct and transparency.

A. Proprietary Trading

Rewbix and its representatives have the opportunity to employ Rewbix's AI technology for their own account. It's important to note that these strategies are the same strategies available to our clients. However, it's crucial to emphasize that these accounts remain entirely separate and adhere to the firm's established policies and procedures. While this situation does introduce a potential conflict of interest, where trading stocks in proprietary accounts could yield more favorable prices compared to client accounts, we diligently address this concern. We ensure that any trading activities are well-documented and monitored through trading reports to ensure strict compliance with our Code of Ethics.

B. Participation or Interest in Client Transactions

Rewbix does not recommend the purchase or sale of securities in which we or any related individuals have a material financial interest.

Item 13. Brokerage Practices

A. Broker-Dealer Recommendation

Rewbix recommends clients utilize the services of Interactive Brokers LLC ("IBKR"). Our recommendation is based on a careful evaluation of several factors, including their strong financial standing, comprehensive range of services, established track record, execution quality, and competitive pricing. Not all investment advisers recommend that a client use a particular broker-dealer.

B. Research and Other Soft Dollar Benefits

Rewbix receives benefits or soft dollar benefits in the form of services received from IBKR, including electronic access to real-time positions, monthly statements, confirmations, and various reports, that offer valuable insights for us to ensure the quality, supervision, and effective monitoring of our clients' accounts. While these benefits enhance our operations, they may potentially result in higher transaction costs than would have been incurred without these benefits.

We acknowledge that this situation may present a conflict of interest, as we have a vested interest in our existing relationship with IBKR. We actively mitigate this conflict through semi-annual best execution reviews and a diligent application of our comprehensive policies and procedures. Our commitment to maintaining fair and reasonable practices is reflected in our assurance that the transaction charges we incur and pass on to our clients are proportional to the value derived from the services received.

C. Brokerage for Client Referrals

Rewbix does not receive any compensation or client referrals from broker-dealers or third parties for utilizing specific broker-dealers.

D. Directed Brokerage

We regularly advise clients to execute transactions through broker-dealers we have affiliations with. Consequently, we may not always achieve the most optimal transaction execution, possibly resulting in higher brokerage commissions than those offered by other broker-dealers providing similar services. Rewbix does not permit clients to use their own broker-dealer.

E. Aggregate Orders

Rewbix will aggregate orders through IBKR whenever feasible, aiming to minimize transaction costs for our clients. The feasibility of this approach is determined based on the availability of the option through IBKR for each transaction.

Item 14. Review of Accounts

We conduct monthly reviews of client portfolios for performance, risk, and asset allocation. Additional reviews may occur due to special market events. An annual review ensures alignment with investment objectives and market conditions. Our reviews consider any changes in clients' personal, professional, or financial situations provided through our website.

Rewbix may initiate more frequent reviews, especially during significant market or economic events, or upon client profile updates and or questionnaire through Rewbix's website.

Item 15. Client Referrals and Other Compensation

Rewbix does not receive any economic benefits from non-clients for providing advisory services to clients.

We do not provide compensation to any individuals, including third parties, for client referrals.

Item 16. Custody

Rewbix does not have custody of client funds. For secure asset holding, Rewbix partners with a qualified custodian designated to maintain client assets. Account statements are sent directly from the qualified custodian to clients on a regular basis. Clients are advised to review these statements carefully. Additionally, Rewbix provides account statements through our interactive website, encouraging clients to compare these with the statements from our qualified custodian for a comprehensive overview of their holdings.

Item 17. Financial Information

Rewbix does not request or solicit prepayment of fees exceeding \$1200 six months or more in advance. We do not have a financial condition that is reasonably likely to impair your ability to meet contractual commitments to clients and we have not been the subject of a bankruptcy petition at any time during the past ten years