

# Robustwealth Wrap Fee Program Brochure

This brochure provides information about the qualifications and business practices of Robustwealth ("Robustwealth"), doing business as or otherwise known as Robustwealth ("Robustwealth"), RobustRIA ("RobustRIA"), ADVRW ("ADVRW") and 2020 Financial Planning Investments ("2020 Financial Planning Investments"). If you have any questions about the contents of this Brochure, please contact us at +1.609.483.5013 or [service@robustwealth.com](mailto:service@robustwealth.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 Robustwealth is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

References herein to Robustwealth as a "registered investment adviser" or any reference to being "registered" does not imply a certain level of skill or training.

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*Registration does not imply a certain level of skill or training.*

Version Date: 09/29/2017

## **Item 2: Material Changes**

Robustwealth has not yet filed an annual updating amendment to this Wrap Fee Program Brochure. Therefore there are no material changes to this brochure to report.

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## Item 4: Services Fees and Compensation

Robustwealth (hereinafter “Robustwealth”) offers the following services to advisory clients:

### A. Description of Services

Robustwealth participates in and sponsors wrap fee programs, which means Robustwealth will wrap third party fees (i.e., custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.) for wrap fee portfolio management accounts. Robustwealth will charge clients one fee, and pay all transaction fees using the fee collected from the client. Accounts participating in the wrap fee program are not charged higher advisory fees based on trading activity, but clients should be aware that Robustwealth has an incentive to limit trading activities for those accounts since the firm absorbs those transaction costs.

Certain other fees are not included in the wrap fee and are paid for separately by the client. These include, but are not limited to, margin costs, charges imposed directly by a mutual fund or exchange traded fund, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions.

The fee schedule is set forth below:

Total Assets Under Management	Annual Fee
\$0 - \$25,000,000	.25%
\$25,000,001 - \$100,000,000	.20%
\$100,000,001 - \$500,000,000	.17%
\$500,000,001 - \$1,000,000,000	.16%
\$1,000,000,001 - And Up	.15%

These fees are negotiable depending upon the needs of the client and complexity of the situation and the final fee schedule is attached as Exhibit II of the client contract. Robustwealth uses an average of the daily balance in the client's account throughout the billing period, after taking into account deposits and withdrawals for purposes of determining the market value of the assets upon which the advisory fee is based.

Advisory fees are withdrawn directly from the client's accounts with client's written authorization or may be invoiced to the client and paid by check, cash, or wire and clients may select the method in which they are billed. Advisory fees are withdrawn directly from the client's accounts with client written authorization. Fees are paid quarterly in arrears. Because fees are charged in arrears, no refund policy is necessary.

Clients may terminate the contract without penalty, for full refund, within five business days of signing the contract. Thereafter, clients may terminate the contract with thirty days' written notice.

### **B. Contribution Cost Factors**

The program may cost the client more or less than purchasing such services separately. There are several factors that bear upon the relative cost of the program, including the trading activity in the client's account, the adviser's ability to aggregate trades, and the cost of the services if provided separately (which in turn depends on the prices and specific services offered by different providers).

### **C. Additional Fees**

Clients who participate in the wrap fee program will not have to pay for transaction or trading fees. However, clients are still responsible for all other account fees, such as annual IRA fees to the custodian, transition fees if the account is moved to another broker, or mutual fund fees.

### **D. Compensation of Client Participation**

Neither Robustwealth, nor any representatives of Robustwealth receive any additional compensation beyond advisory fees for the participation of client's in the wrap fee program. However, compensation received may be more than what would have been received if client paid separately for investment advice, brokerage, and other services. Therefore, Robustwealth may have a financial incentive to recommend the wrap fee program to clients.

## **Item 5: Account Requirements and Types of Clients**

Robustwealth generally provides its wrap fee program services to the following types of clients:

- Individuals
- High net-worth individuals
- Trusts and estates
- Endowments, foundations, and other charitable organizations
- Corporations and other business entities
- Pension and profit sharing plans
- Registered Investment Advisors

There is no account minimum.

## **Item 6: Portfolio Manager Selection and Evaluation**

### **A. Selecting/Reviewing Portfolio Managers**

Robustwealth will not select any outside portfolio managers for management of this wrap fee program. Robustwealth will be the sole portfolio manager for this wrap fee program.

#### ***Standards Used to Calculate Portfolio Manager Performance***

Robustwealth will use industry standards to calculate portfolio manager performance.

#### ***Review of Performance Information***

Robustwealth reviews the performance information to determine and verify its accuracy and compliance with presentation standards. The performance information is reviewed quarterly and is reviewed by Robustwealth

### **B. Related Persons**

Robustwealth and its personnel serve as the portfolio managers for all wrap fee program accounts. This is a conflict of interest in that no outside adviser assesses Robustwealth's management of the wrap fee program. However, Robustwealth addresses this conflict by acting in its clients' best interest consistent with its fiduciary duty as sponsor and portfolio manager of the wrap fee program.

### **C. Advisory Business**

Robustwealth offers portfolio management services to its wrap fee program participants as discussed in Section 4 above.

#### ***Wrap Fee Portfolio Management***

Robustwealth offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. Robustwealth creates an Investment Policy Statement for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels) and then constructs a plan (the Investment Policy Statement) to aid in the selection of a portfolio that matches each client's specific situation. Portfolio management includes, but is not limited to, the following:

- |                       |                                |
|-----------------------|--------------------------------|
| • Investment strategy | • Personal investment policy   |
| • Asset allocation    | • Asset selection              |
| • Risk tolerance      | • Regular portfolio monitoring |

Robustwealth evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

Portfolio management accounts participating in the wrap fee program will not have to pay for transaction or trading fees. Robustwealth will charge clients one fee, and pay transaction fees using the advisory fee collected from the client. Certain other fees are not included in the wrap fee and are paid for separately by the client. These include, but are not limited to, margin costs, charges imposed directly by a mutual fund or exchange traded fund, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions.

Accounts participating in the wrap fee program are not charged higher advisory fees based on trading activity, but clients should be aware that Robustwealth has an incentive to limit trading activities for those accounts since the firm absorbs those transaction costs. To address this conflict, Robustwealth will always act in the best interest of its clients consistent with its fiduciary duty as an investment adviser.

### ***Performance-Based Fees and Side-By-Side Management***

Robustwealth does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

### ***Services Limited to Specific Types of Investments***

Robustwealth uses an investment process to help match clients risk profile and objectives to suitable investments. A Client's final portfolio incorporates the return and risk assumptions from quantitative models and qualitative considerations.

### ***Client Tailored Services and Client Imposed Restrictions***

Robustwealth offers the same suite of services to all of its clients. However, specific client financial plans and their implementation are dependent upon the client Investment Policy Statement which outlines each client's current situation (income, tax levels, and risk tolerance levels) and is used to construct a client specific plan to aid in the selection of a portfolio that matches restrictions, needs, and targets.

Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent Robustwealth from properly servicing the client account, or if the restrictions would require Robustwealth to deviate from its standard suite of services, Robustwealth reserves the right to end the relationship.

### ***Wrap Fee Programs***



Robustwealth sponsors and acts as portfolio manager for this wrap fee program. Robustwealth manages the investments in the wrap fee program, but does not manage those wrap fee accounts any differently than non-wrap fee accounts. The fees paid to the wrap account program will be given to Robustwealth as a management fee.

### ***Amounts Under Management***

Robustwealth has the following assets under management:

Assets Under Management Robustwealth has \$356,000 in discretionary assets under management as of December 31, 2016.

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

Robustwealth uses an investment process to help match clients risk profile and objectives to suitable investments. A Client's final portfolio incorporates the return and risk assumptions from quantitative models and qualitative considerations. Below are the steps taken to create a Client's target portfolio:

- Strategic Asset Allocation: Long-Term Return & Risk Assumptions
- Tactical Asset Allocation: Short-Term Return & Risk Assumptions
- Portfolio Construction: Optimization and Qualitative Considerations
- Portfolio Implementation: Securities, Strategies, Factor and/or Fund Views
- Client Risk Tolerance: Risk Tolerance and Liquidity Profile

Robustwealth may utilize the following methods of security analysis:

- Fundamental - (analysis performed on historical and present data, with the goal of making financial forecasts);
- Technical - (analysis performed on historical and present data, focusing on price and trade volume, to forecast the direction of prices); and
- Cyclical - (analysis performed on historical relationships between price and market trends, to forecast the direction of prices).

Robustwealth may utilize the following investment strategies when implementing investment advice given to clients:

- Long Term Purchases (securities held at least a year);
- Short Term Purchases (securities sold within a year); and
- Trading (securities sold within thirty (30) days).

**Please Note: Investment Risk.** Investing in securities involves risk of loss that clients should be prepared to bear. Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy (including the investments and/or investment strategies recommended or undertaken by Robustwealth) will be profitable or equal any specific performance level(s).

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

***Material Risks Involved***

Robustwealth's methods of analysis and investment strategies do not present any significant or unusual risks. However, every method of analysis has its own inherent risks. To perform an accurate market analysis Robustwealth must have access to current/new market information. Robustwealth has no control over the dissemination rate of market information; therefore, unbeknownst to Robustwealth, certain analyses may be compiled with outdated market information, severely limiting the value of Robustwealth's analysis. Furthermore, an accurate market analysis can only produce a forecast of the direction of market values. There can be no assurances that a forecasted change in market value will materialize into actionable and/or profitable investment opportunities.

Robustwealth's primary investment strategies - Long Term Purchases, Short Term Purchases, and Trading - are fundamental investment strategies. However, every investment strategy has its own inherent risks and limitations. For example, longer term investment strategies require a longer investment time period to allow for the strategy to potentially develop. Shorter term investment strategies require a shorter investment time period to potentially develop but, as a result of more frequent trading, may incur higher transactional costs when compared to a longer term investment strategy. Trading, an investment strategy that requires the purchase and sale of securities within a thirty (30) day investment time period involves a very short investment time period but will incur higher transaction costs when compared to a short term investment strategy and substantially higher transaction costs than a longer term investment strategy.

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

***Risks of Specific Securities Utilized***

Currently, Robustwealth primarily allocates client investment assets among various mutual funds, ETFs, individual equities, and bonds on a discretionary basis in accordance with the client's designated investment objective(s).

As part of its ERISA § 3(38) Investment Management Services described in Item 4 above, Robustwealth may also manage one or more asset allocation models from which plan participants may select in self-directing their retirement accounts. These asset allocation models have been designed to comply with the requirements of Rule 3a-4 of the Investment Company Act of 1940. Rule 3a-4 provides similarly managed investment programs, such as Robustwealth's asset allocation models, with a non-exclusive safe harbor from the definition of an investment company. In accordance with Rule 3a-4, the following disclosure is applicable to Robustwealth's management of client assets through the asset allocation models:

1. Initial Interview – at the opening of the account, Robustwealth, through its designated representatives, will obtain from the client information sufficient to determine the client’s financial situation and investment objective(s);
2. Individual Treatment - the account is managed on the basis of the client’s financial situation and investment objective(s);
3. Quarterly Notice – at least quarterly Robustwealth will notify the client to advise Robustwealth whether the client’s financial situation or investment objective(s) have changed, or if the client wants to impose and/or modify any reasonable restrictions on the management of the account;
4. Annual Contact – at least annually, Robustwealth will contact the client to determine whether the client’s financial situation or investment objective(s) have changed, or if the client wants to impose and/or modify any reasonable restrictions on the management of the account;
5. Consultation Available – Robustwealth will be reasonably available to consult with the client relative to the status of the account;
6. Quarterly Report – the client will be provided with a quarterly report for the account for the preceding period;
7. Ability to Impose Restrictions – the client will have the ability to impose reasonable restrictions on the management of the account, including the ability to instruct Robustwealth not to purchase certain mutual funds;
8. No Pooling – the client’s beneficial interest in a security does not represent an undivided interest in all the securities held by the custodian, but rather represents a direct and beneficial interest in the securities which comprise the account;
9. Separate Account - a separate account is maintained for the client with the Custodian;
10. Ownership – each client retains indicia of ownership of the account (e. g. right to withdraw securities or cash, exercise or delegate proxy voting, and receive transaction confirmations).

Robustwealth believes that its annual investment advisory fee is reasonable in relation to: (1) the advisory services provided under applicable form of client Agreement; and (2) the fees charged by other investment advisers offering similar services/programs. However, Robustwealth’s annual advisory fee may be higher than that charged by other investment advisers offering similar services/programs. In addition to Robustwealth’s annual investment advisory fee, the client will also incur charges imposed directly at the mutual and exchange traded fund level (e.g., management fees and other fund expenses). **Please Note:** Robustwealth’s asset allocation models may involve above-average portfolio turnover, which could negatively impact upon the net after-tax gain experienced by an individual client in a taxable account.

Robustwealth’s asset allocation models utilize strategic asset allocation, tactical asset allocation, and active and/or passive implementation. The composition of each asset allocation model will vary based upon the specific retirement target date for the respective model, which generally end every 5 years between 2020 and 2060.

When creating an asset allocation model, Robustwealth uses other models and qualitative inputs that may be based on valuation, long-term economic growth forecasts, long-term earnings forecasts and other factors to develop long-term investment views. The long-term investment views are used to create a strategic or long-term asset allocation target. The

strategic asset allocation is designed to attempt to meet the asset allocation model's investment objective over the long-term. The strategic asset allocation is used in the creation of the target date models at each target date point and considers risk and reward. Strategic asset allocation views are applied to asset classes such as U.S. equities, global equities, currencies, fixed income, commodities and other asset classes or factors.

In addition to long-term views, Robustwealth has shorter-term tactical asset allocation views. The tactical asset allocation views may be based on inputs from short-term events, market sentiment indicators such as implied volatility, short-term risk signals, earnings momentum and other factors. These short-term investment views may be used to dynamically tilt the investment strategy's strategic asset allocation towards asset classes or factors that may have a more favorable risk and reward. Tactical asset allocation views are applied to asset classes such as U.S. equities, global equities, currencies, fixed income, commodities and other asset classes or factors.

Robustwealth may implement the final model portfolio view using a combination of passive (index) strategies or active strategies. An investment strategy's desired exposure, from strategic and tactical asset allocation views, will be implemented with vehicles or instruments such as mutual funds, ETFs, exchange traded notes, individual stocks, individual bonds and other vehicles or instruments. When deciding on implementation Robustwealth may consider a strategy's alpha opportunity in a given economic or market cycle, fees, liquidity, asset class exposure and other factors.

**Past performance is not a guarantee of future returns. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

### ***Voting Client Proxies***

Robustwealth will accept voting authority for client securities in certain cases. When Robustwealth does accept voting authority for client securities, it will always seek to vote in the best interests of its clients. Robustwealth does not maintain preapproved voting guidelines but relies on the investment committee to determine the appropriate course of action in voting client securities that is in the best interest of the client. Clients may direct Robustwealth on how to vote client securities by communicating their wishes in writing or electronically to Robustwealth. When voting client proxies the investment committee will always hold the interests of the clients above its own interests. Clients of Robustwealth may obtain the voting record of Robustwealth on client securities by contacting Robustwealth at phone number or e-mail address listed on the cover page of this brochure. Clients may obtain a copy of Robustwealth's proxy voting policies and procedures upon request.

## **Item 7: Client Information Provided to Portfolio Managers**

All client information material to managing the portfolio (including basic information, risk tolerance, sophistication level, and income level) is provided to the portfolio manager. The portfolio manager will also have access to that information as it changes and is updated.

## **Item 8: Client Contact with Portfolio Managers**

Robustwealth places no restrictions on client ability to contact its portfolio managers. Robustwealth's Chief Compliance Officer can be contacted during regular business hours and contact information is on the cover page of the Chief Compliance Officer's Form ADV Part 2B brochure supplement.

## **Item 9: Additional Information**

### **A. Disciplinary Action and Other Financial Industry Activities**

#### ***Criminal or Civil Actions***

There are no criminal or civil actions to report.

#### ***Administrative Proceedings***

There are no administrative proceedings to report.

#### ***Self-regulatory Organization Proceedings***

There are no self-regulatory organization proceedings to report.

#### ***Registration as a Broker/Dealer or Broker/Dealer Representative***

Neither Robustwealth nor its representatives are registered as or have pending applications to become a broker/dealer or as representatives of a broker/dealer.

#### ***Registration as a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor***

Neither Robustwealth nor its representatives are registered as or have pending applications to become a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor.

#### ***Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests***

Neither Robustwealth nor its representatives have any material relationships to this advisory business that would present a possible conflict of interest.

#### ***Selection of Other Advisors or Managers and How This Adviser is Compensated for Those Selections***

Robustwealth does not utilize nor select other advisors or third party managers. All assets are managed by Robustwealth management.

## **B. Code of Ethics, Client Referrals, and Financial Information**

### ***Code of Ethics***

We have a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. Our Code of Ethics is available free upon request to any client or prospective client.

### ***Recommendations Involving Material Financial Interests***

Robustwealth does not recommend that clients buy or sell any security in which a related person to Robustwealth or Robustwealth has a material financial interest.

### ***Investing Personal Money in the Same Securities as Clients***

From time to time, representatives of Robustwealth may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of Robustwealth to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. Robustwealth will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

### ***Trading Securities At/Around the Same Time as Clients' Securities***

From time to time, representatives of Robustwealth may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of Robustwealth to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest; however, Robustwealth will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

### ***Frequency and Nature of Periodic Reviews and Who Makes Those Reviews***

Client accounts are reviewed at least quarterly only by the Chief Compliance Officer. The Chief Compliance Officer is instructed to review clients' accounts with regards to their

investment policies and risk tolerance levels. All accounts at Robustwealth are assigned to this reviewer.

### ***Factors That Will Trigger a Non-Periodic Review of Client Accounts***

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

### ***Content and Frequency of Regular Reports Provided to Clients***

Each client will receive at least quarterly from the custodian, a written report that details the client's account including assets held and asset value which will come from the custodian.

### ***Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)***

Robustwealth may receive indirect economic benefits from Ascensus, Interactive, or US Bank, such as support services and/or products. Robustwealth does not receive any economic benefit, directly or indirectly from any third party for advice rendered to Robustwealth clients.

### ***Compensation to Non – Advisory Personnel for Client Referrals***

Robustwealth does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

### ***Balance Sheet***

Robustwealth does not require nor solicit prepayment of more than \$1,200 in fees per client, six months or more in advance and therefore does not need to include a balance sheet with this brochure.

### ***Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients***

Neither Robustwealth nor its management have any financial conditions that are likely to reasonably impair our ability to meet contractual commitments to clients.

### ***Bankruptcy Petitions in Previous Ten Years***

Robustwealth has not been the subject of a bankruptcy petition in the last ten years.