

Robbins Financial Advisory Service, Inc.  
d/b/a  
**Robbins Wealth Management**

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**FORM ADV PART 2A  
BROCHURE**

This brochure provides information about the qualifications and business practices of Robbins Financial Advisory Service, Inc. If you have any questions about the contents of this brochure, contact us at 814-838-4185 or by email at [info@investrwm.com](mailto:info@investrwm.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 Robbins Financial Advisory Service, Inc. is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Robbins Financial Advisory Service, Inc. is a registered investment adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

## **Item 2 Summary of Material Changes**

Form ADV Part 2 requires registered investment advisers to amend their brochure when information becomes materially inaccurate. If there are any material changes to an adviser's disclosure brochure, the adviser is required to notify you and provide you with a description of the material changes.

Since the filing of our last annual updating amendment, dated January 31, 2019 we have no material changes to report.

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## Item 4 Advisory Business

### Description of Firm

Robbins Financial Advisory Service, Inc. (dba Robbins Wealth Management) is a registered investment adviser based in Erie, Pennsylvania and has been providing investment advisory services since 1990. We are organized as a corporation under the laws of the State of Pennsylvania and owned by James H. Robbins and Janice K. Robbins.

The following paragraphs describe our services and fees. Refer to the description of each investment advisory service listed below for information on how we tailor our advisory services to your individual needs. As used in this brochure, the words "we," "our," and "us" refer to Robbins Financial Advisory Service, Inc. and the words "you," "your," and "client" refer to you as either a client or prospective client of our firm.

### Portfolio Management Services

We offer discretionary portfolio management services. Our investment advice is tailored to meet our clients' needs and investment objectives. If you participate in our discretionary portfolio management services, we require you to grant our firm discretionary authority to manage your account. Discretionary authorization will allow us to determine the specific securities, and the amount of securities, to be purchased or sold for your account without your approval prior to each transaction. Discretionary authority is typically granted by the investment advisory agreement you sign with our firm and the appropriate trading authorization forms.

You may limit our discretionary authority (for example, limiting the types of securities that can be purchased or sold for your account) by providing our firm with your restrictions and guidelines in writing.

We also offer non-discretionary portfolio management services. If you enter into a non-discretionary arrangement with our firm, we must obtain your approval prior to executing any transactions on behalf of your account. You have an unrestricted right to decline to implement any advice provided by our firm on a non-discretionary basis.

In conjunction with our portfolio management service, we may include financial planning which typically involves providing a variety of other services to clients regarding the management of their financial resources based upon an analysis of their individual needs. These services can range from broad-based financial planning to consultative or single subject planning. Such services may include planning in the following areas:

- Family Continuity;
- Estate Planning and Trustee Oversight;
- Integrated Tax and Financial Planning;
- Lifestyle Management;
- Family Philanthropy; and
- Risk Management

If you retain our firm for financial planning services, we will meet with you to gather information about your financial circumstances and objectives. We may also use financial planning software to determine your current financial position and to define and quantify your long-term goals and objectives. Once we specify those long-term objectives (both financial and non-financial), we will develop shorter-term, targeted objectives. Once we review and analyze the information you provide to our firm and the data derived from our financial planning software, we will deliver a written plan to you, designed to help you achieve your stated financial goals and objectives.

Financial plans are based on your financial situation at the time we present the plan to you, and on the financial information you provide to us. You must promptly notify our firm if your financial situation, goals, objectives, or needs change.

### **Tax Preparation and Accounting Services**

Upon client request, Robbins Wealth Management offers tax preparation and trust accounting services for clients. You are under no obligation to use our firm for tax preparation or trust accounting services.

### **Types of Investments**

We primarily offer advice on equity securities, mutual funds, and exchange traded funds (ETFs). Additionally, we may advise you on any type of investment that we deem appropriate based on your stated goals and objectives. We may also provide advice on any type of investment held in your portfolio at the inception of our advisory relationship.

Since our investment strategies and advice are based on each client's specific financial situation, the investment advice we provide to you may be different or conflicting with the advice we give to other clients regarding the same security or investment.

### **Assets Under Management**

As of February 10, 2020, we provide continuous management services for \$10,125,723 in client assets on a discretionary basis, and \$137,437,556 in client assets on a non-discretionary basis. We also manage \$2,739,640 in client assets on a non-continuous basis.

## **Item 5 Fees and Compensation**

### **Portfolio Management Services**

Our investment advisory fees are billed quarterly, in arrears, meaning that we invoice clients after the three-month (quarterly) billing period has ended. Payment in full is expected upon invoice presentation. However, fees are typically deducted directly from a client's account held at TD Ameritrade to facilitate billing. The client must consent in advance to direct debiting of their investment account. Further, the qualified custodian will deliver an account statement to you at least quarterly. These account statements will show all disbursements from your account. You should review all statements for accuracy. Clients have the option of paying their fees directly rather than direct debiting fees from their TD Ameritrade account, but this option is not widely chosen.

The annual fee for investment advisory services is based on a percentage of the investable assets according to the following schedule:

<b>Asset Range</b>	<b>Annual Percentage Fee</b>
\$0.00 - \$1,000,000	1.00%
\$1,000,000 - \$2,000,000	0.80%
\$2,000,000 - \$3,000,000	0.70%
All assets above \$3,000,000	0.60%

The minimum annual fee is \$3,000. Legacy clients may operate under a different fee schedule depending upon the prevailing schedule at the time they became a client and subject to approval by an officer of the company.

These fees are negotiable only on rare occasions.

If the portfolio management agreement is executed at any time other than the first day of a calendar quarter, our fees will apply on a pro rata basis, which means that the advisory fee is payable in proportion to the number of days in the quarter for which you are a client.

At our discretion, we may combine the account values of family members living in the same household to determine the applicable advisory fee. For example, we may combine account values for you and your minor children, joint accounts with your spouse, and other types of related accounts. Combining account values may increase the asset total, which may result in your paying a reduced advisory fee based on the available breakpoints in our fee schedule stated above.

You may terminate the portfolio management agreement at any time by written notice. You will incur a pro rata charge for services rendered prior to the termination of the portfolio management agreement, which means you will incur advisory fees only in proportion to the number of days in the quarter for which you are a client.

### **Tax Preparation and Accounting Services**

The hourly rate for tax preparation services is \$150.00 which is negotiable depending on the complexity and scope of the preparation service being provided. An estimate of the time for tax preparation services will be provided to you in advance. You will be invoiced upon completion of the services.

For trust accounting services the fee will be negotiated once our firm has reviewed the complexity and scope of the trust accounting service being provided. You will be invoiced per the negotiated rate upon completion of the services.

### **Additional Fees and Expenses**

As part of our investment advisory services to you, we may invest, or recommend that you invest, in mutual funds and exchange traded funds. The fees that you pay to our firm for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds or exchange traded funds (described in each fund's prospectus) to their shareholders. These fees will generally include a management fee and other fund expenses. In most cases, the same, or similar mutual funds are offered in different "share classes" with different internal costs. We consider the internal costs when recommending a particular mutual fund share class and will usually endeavor to select or recommend the lowest cost share class available. You will also incur transaction charges and/or brokerage fees when purchasing or selling securities. These charges and fees are typically imposed by the broker-dealer or custodian through whom your account transactions are executed. We do not share in any portion of the brokerage fees/transaction charges imposed by the broker-dealer or custodian. To fully understand the total cost you will incur, you should review all the fees charged by mutual funds, exchange traded funds, our firm, and others. For information on brokerage practices, refer to the *Brokerage Practices* section of this brochure.

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

We do not accept performance-based fees or participate in side-by-side management. Performance-based fees are fees that are based on a share of a capital gains or capital appreciation of a client's account. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees. Our fees are calculated as described in the *Fees and Compensation* section above, and are not charged on the basis of a share of capital gains upon, or capital appreciation of, the funds in your advisory account.

## Item 7 Types of Clients

We offer investment advisory services to individuals and high net worth individuals as well as participants of profit sharing/401K/403B plans, trusts, estates, charitable organizations and small businesses.

The minimum account size is \$300,000 of assets under management. This equates to an annual fee of \$3,000. When an account falls below \$300,000 in value, the minimum annual fee of \$3,000 is charged.

Accounts of less than \$300,000 may be set up with the understanding that the minimum annual fee is \$3,000. Other exceptions may apply to our employees and their relatives, or relatives of existing clients subject to approval by an officer of the company. Legacy clients who do not meet current account minimums are permitted to remain clients of Robbins Wealth Management subject to approval by an officer of the company.

Clients with assets below the minimum account size may pay a higher percentage rate on their annual fees than the fees paid by clients with greater assets under management.

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

We may use one or more of the following methods of analysis or investment strategies when providing investment advice to you:

### **Methods of Analysis**

**Technical Analysis** - involves studying past price patterns, trends, and interrelationships in the financial markets to assess risk-adjusted performance and predict the direction of both the overall market and specific securities.

- *Risk:* The risk of market timing based on technical analysis is that our analysis may not accurately detect anomalies or predict future price movements. Current prices of securities may reflect all information known about the security and day-to-day changes in market prices of securities may follow random patterns and may not be predictable with any reliable degree of accuracy.

**Fundamental Analysis** - involves analyzing individual companies and their industry groups, such as a company's financial statements, details regarding the company's product line, the experience and expertise of the company's management, and the outlook for the company and its industry. The resulting data is used to measure the true value of the company's stock compared to the current market value.

- *Risk:* The risk of fundamental analysis is that information obtained may be incorrect and the analysis may not provide an accurate estimate of earnings, which may be the basis for a stock's value. If securities prices adjust rapidly to new information, utilizing fundamental analysis may not result in favorable performance.

## **Investment Strategies**

The primary investment strategy used on client accounts is strategic asset allocation. We often use a group of funds to create a diversified base and then tactically extend into individual equities, individual fixed income, and customized options strategies.

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time.

Sometimes, we may recommend long-term purchases, short-term purchases, margin transactions, or option writing depending on a client's taxable situation and the prevailing investment environment. Investment in any security may involve the risk of loss.

**Long-Term Purchases** - securities purchased with the expectation that the value of those securities will grow over a relatively long period of time, generally greater than one year.

- *Risk:* Using a long-term purchase strategy generally assumes the financial markets will go up in the long-term which may not be the case. There is also the risk that the segment of the market that you are invested in or perhaps just your particular investment will go down over time even if the overall financial markets advance. Purchasing investments long-term may create an opportunity cost - "locking-up" assets that may be better utilized in the short-term in other investments.

**Short-Term Purchases** - securities purchased with the expectation that they will be sold within a relatively short period of time, generally less than one year, to take advantage of the securities' short-term price fluctuations.

- *Risk:* Using a short-term purchase strategy generally assumes that we can predict how financial markets will perform in the short-term which may be very difficult and will incur a disproportionately higher amount of transaction costs compared to long-term trading. There are many factors that can affect financial market performance in the short-term (such as short-term interest rate changes, cyclical earnings announcements, etc.) but may have a smaller impact over longer periods of times.

**Margin Transactions** - a securities transaction in which an investor borrows money to purchase a security, in which case the security serves as collateral on the loan.

- *Risk:* If the value of the shares drops sufficiently, the investor will be required to either deposit more cash into the account or sell a portion of the stock in order to maintain the margin requirements of the account. This is known as a "margin call." An investor's overall risk includes the amount of money invested plus the amount that was loaned to them.

**Option Writing** - a securities transaction that involves selling an option. An option is the right, but not the obligation, to buy or sell a particular security at a specified price before the expiration date of the option. If an investor sells a call option, he or she must deliver to the buyer a specified number of shares if the buyer exercises the option. The seller receives a premium from the buyer (the market price of the option at a particular time) in exchange for writing the option.

- *Risk:* Options are complex investments and can be very risky, especially if the investor does not own the underlying stock. In certain situations, an investor's risk can be unlimited.



Our investment strategies and advice may vary depending upon each client's specific financial situation. As such, we determine investments and allocations based upon your predefined objectives, risk tolerance, time horizon, financial information, liquidity needs and other various suitability factors. Your restrictions and guidelines may affect the composition of your portfolio. **It is important that you notify us immediately with respect to any material changes to your financial circumstances, including for example, a change in your current or expected income level, tax circumstances, or employment status.**

### **Tax Considerations**

Our strategies and investments may have unique and significant tax implications. However, unless we specifically agree otherwise, and in writing, tax efficiency is not our primary consideration in the management of your assets. Regardless of your account size or any other factors, we strongly recommend that you consult with a tax professional regarding the investing of your assets.

Custodians and broker-dealers must report the cost basis of equities acquired in client accounts. Your custodian will default to the First-In First-Out ("FIFO") accounting method for calculating the cost basis of your investments. You are responsible for contacting your tax advisor to determine if this accounting method is the right choice for you. If your tax advisor believes another accounting method is more advantageous, provide written notice to our firm immediately and we will alert your account custodian of your individually selected accounting method. Decisions about cost basis accounting methods will need to be made before trades settle, as the cost basis method cannot be changed after settlement.

### **Risk of Loss**

Investing in securities involves risk of loss that you should be prepared to bear. We do not represent or guarantee that our services or methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines. We cannot offer any guarantees or promises that your financial goals and objectives will be met. Past performance is in no way an indication of future performance.

### **Recommendation of Particular Types of Securities**

As disclosed under the *Advisory Business* section in this brochure, we primarily offer advice on equity securities, mutual funds, and exchange traded funds (ETFs). However, we may recommend other types of investments as appropriate for you since each client has different needs and different tolerance for risk. Each type of security has its own unique set of risks associated with it and it would not be possible to list here all of the specific risks of every type of investment. Even within the same type of investment, risks can vary widely. However, in very general terms, the higher the anticipated return of an investment, the higher the risk of loss associated with it.

*Stock (equity securities):* There are numerous ways of measuring the risk of equity securities (also known simply as "equities" or "stock"). In very broad terms, the value of a stock depends on the financial health of the company issuing it. However, stock prices can be affected by many other factors including, but not limited to: the class of stock (for example, preferred or common); the health of the market sector of the issuing company; and, the overall health of the economy. In general, larger, more well established companies ("large cap") tend to be safer than smaller start-up companies ("small cap") but the mere size of an issuer is not, by itself, an indicator of the safety of the investment.

**Mutual Funds:** Mutual funds are professionally managed collective investment systems that pool money from many investors and invest in stocks, bonds, short-term money market instruments, other mutual funds, other securities or any combination thereof. The fund will have a manager that trades the fund's investments in accordance with the fund's investment objective. While mutual funds are generally provide diversification, fund objectives and concentration should be considered. Also, while some mutual funds are "no load" and charge no fee to buy into, or sell out of, the fund, other types of mutual funds do charge such fees which can also reduce returns. Mutual funds can be "closed end" or "open end". "Open end" mutual funds continue to allow new investors indefinitely whereas "closed end" funds have a fixed number of shares to sell which can limit their availability to new investors.

**Exchange Traded Funds (ETFs):** ETFs are securities that track an index, commodity, or basket of assets like an index fund, but trade on an exchange like stock. An ETFs is similar to a mutual fund because it normally represents a basket of other securities and provides a higher level of diversification than an individual equity. A small number of ETFs are actively managed by investment professionals. ETFs also have fees and expenses similar to mutual funds.

### **Other Risk Considerations**

When evaluating risk, financial loss may be viewed differently by each client and may depend on many different risks, each of which may affect the probability and magnitude of any potential losses. The following risks may not be all-inclusive, but should be considered carefully by a prospective client before retaining our services.

**Liquidity Risk:** The risk of being unable to sell your investment at a fair price at a given time due to high volatility or lack of active liquid markets. You may receive a lower price or it may not be possible to sell the investment at all.

**Credit Risk:** Credit risk typically applies to debt investments such as corporate, municipal, and sovereign fixed income or bonds. A bond issuing entity can experience a credit event that could impair or erase the value of an issuer's securities held by a client.

**Inflation and Interest Rate Risk:** Security prices and portfolio returns will likely vary in response to changes in inflation and interest rates. Inflation causes the value of future dollars to be worth less and may reduce the purchasing power of a client's future interest payments and principal. Inflation also generally leads to higher interest rates which may cause the value of many types of fixed income investments to decline.

**Horizon and Longevity Risk:** The risk that your investment horizon is shortened because of an unforeseen event, for example, the loss of your job. This may force you to sell investments that you were expecting to hold for the long term. If you must sell at a time that the markets are down, you may lose money. Longevity Risk is the risk of outliving your savings. This risk is particularly relevant for people who are retired, or are nearing retirement.

## **Item 9 Disciplinary Information**

We are required to disclose the facts of any legal or disciplinary events that are material to a client's evaluation of our advisory business or the integrity of our management. We do not have any required disclosures under this item.

## Item 10 Other Financial Industry Activities and Affiliations

We have not provided information on other financial industry activities and affiliations because we do not have any relationship or arrangement that is material to our advisory business or to our clients with any of the types of entities listed below.

1. broker-dealer, municipal securities dealer, or government securities dealer or broker;
2. 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);
3. other investment adviser or financial planner;
4. futures commission merchant, commodity pool operator, or commodity trading adviser;
5. banking or thrift institution;
6. accountant or accounting firm;
7. lawyer or law firm;
8. insurance company or agency;
9. pension consultant;
10. real estate broker or dealer; and/or
11. sponsor or syndicator of limited partnerships.

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

### Description of Our Code of Ethics

We strive to comply with applicable laws and regulations governing our practices. Therefore, our Code of Ethics includes guidelines for professional standards of conduct for persons associated with our firm. Our goal is to protect your interests at all times and to demonstrate our commitment to our fiduciary duties of honesty, good faith, and fair dealing with you. All persons associated with our firm are expected to adhere strictly to these guidelines. Persons associated with our firm are also required to report any violations of our Code of Ethics. Additionally, we maintain and enforce written policies reasonably designed to prevent the misuse or dissemination of material, non-public information about you or your account holdings by persons associated with our firm.

Clients or prospective clients may obtain a copy of our Code of Ethics by contacting us at the telephone number on the cover page of this brochure.

### Participation or Interest in Client Transactions

Neither our firm nor any persons associated with our firm has any material financial interest in client transactions beyond the provision of investment advisory services as disclosed in this brochure.

### Personal Trading Practices

Our firm or persons associated with our firm may buy or sell the same securities that we recommend to you or securities in which you are already invested. A conflict of interest exists in such cases because we have the ability to trade ahead of you and potentially receive more favorable prices than you will receive. To mitigate this conflict of interest, it is our policy that neither our firm nor persons associated with our firm shall have priority over your account in the purchase or sale of securities.

**Aggregated Trading**

Our firm or persons associated with our firm may buy or sell securities for you at the same time we or persons associated with our firm buy or sell such securities for our own account. We may also combine our orders to purchase securities with your orders to purchase securities ("aggregated trading"). Refer to the Brokerage Practices section in this brochure for information on our aggregated trading practices.

A conflict of interest exists in such cases because we have the ability to trade ahead of you and potentially receive more favorable prices than you will receive. To eliminate this conflict of interest, it is our policy that neither our firm nor persons associated with our firm shall have priority over your account in the purchase or sale of securities.

**Item 12 Brokerage Practices****TD Ameritrade Institutional**

Robbins Wealth Management participates in the institutional advisor program (the "Program") offered by TD Ameritrade Institutional. TD Ameritrade Institutional is a division of TD Ameritrade Inc., member FINRA/SIPC ("TD Ameritrade"), an unaffiliated SEC-registered broker-dealer and FINRA member. TD Ameritrade offers to independent investment advisors services which include custody of securities, trade execution, clearance and settlement of transactions. We receive some benefits from TD Ameritrade through our participation in the Program.

As disclosed above, we participate in TD Ameritrade's institutional customer program and may recommend TD Ameritrade to you for custody and brokerage services. There is no direct link between our participation in the Program and the investment advice given you, although we receive economic benefits through our participation in the Program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving our participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to your accounts); the ability to have advisory fees deducted directly from your accounts; access to an electronic communications network for order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to us by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by our related persons. Some of the products and services made available by TD Ameritrade through the Program may benefit us but may not benefit your accounts. These products or services may assist us in managing and administering your accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help us manage and further develop our business enterprise. The benefits received by us or our personnel through participation in the Program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of our fiduciary duties to you, we endeavor at all times to put your interests first. You should be aware, however, that the receipt of economic benefits by us or our related persons in and of itself creates a potential conflict of interest and may indirectly influence our choice of TD Ameritrade for custody and brokerage services.

## **Best Execution**

Robbins Wealth Management reviews the execution of trades at TD Ameritrade semi-annually. We evaluate the quality and cost of services received by TD Ameritrade, compared to other alternative broker/dealers, including execution, commission rates, value of research, financial responsibility and responsiveness, among other things. In addition, consideration will be given to time and cost of changing broker/dealers (cost/benefit) and the impact on clients. We do not receive any portion of the trading fees.

## **Soft Dollars**

We do not use soft dollar arrangements.

## **Order Aggregation**

Because we typically trade client accounts separately and treat each client's portfolio individually, we do not, in most cases, engage in order aggregation (or so-called "block trading"). Trades are only aggregated in select circumstances, such as for a client who holds a security in multiple accounts or when multiple clients have all expressed an interest to either purchase or sell a security at the same time. While we generally do not engage in block trading, our policies do permit us to include proprietary accounts if we did a block trade. Doing so would avoid a conflict of interest since the proprietary trade would be executed at the same time as the block trade and, therefore, we would not obtain any better price than the client. Accordingly, you may pay different prices for the same securities transactions than other clients pay. Furthermore, we may not be able to buy and sell the same quantities of securities for you and you may pay higher commissions, fees, and/or transaction costs than other clients.

## **Item 13 Review of Accounts**

### **Periodic Reviews**

Advisors are instructed to consider the client's current security positions and the likelihood that the performance of each security will contribute to the investment objectives of the client. Reviews will be conducted by one of our financial advisors.

Account reviews are performed on the following schedule by our financial advisors:

<b>Asset Range</b>	<b>Reviews Per Year</b>
\$0 - \$300,000	1
\$300,000 - \$450,000	2
\$450,000 - \$600,000	3
\$600,000 - \$5,000,000	4
Above \$5,000,000	8

Financial Planning is a collaborative process that helps maximize a client's potential for meeting life goals through financial advice that integrates relevant elements of the client's personal and financial circumstances. A CFP® professional must comply with the Practice Standards set forth in the CFP® Board seven step Financial Planning Process.

### **Review Triggers**

Other conditions that may trigger a review are changes in the tax laws, new investment information, changes in a client's financial situation, new and systemic information on a security owned, options expiration, or other options related reasons.

## **Regular Reports**

Clients receive quarterly statements which detail the assets held in each account, account performance relative to the S&P 500 Index, and performance on each individual security owned.

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

### **Outgoing Referrals**

Robbins Wealth Management does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

Although we no longer do so, the company had previously participated in TD Ameritrade AdvisorDirect (the "Advisor Direct" or "referral program"). At that time, we received some client referrals from TD Ameritrade through our participation in the referral program. As such, we paid certain compensation to TD Ameritrade and, while we do not charge such clients any additional fees by reason of their having been referred to us by TD Ameritrade, our participation in the referral program raises potential conflicts of interest in that we have a financial incentive to keep the account at TD Ameritrade for custody and transaction services. In addition, were we to solicit clients referred to us through AdvisorDirect to transfer their accounts from TD Ameritrade or to establish brokerage or custody accounts at other custodians, we would incur additional fees from TD Ameritrade which causes us to have a conflict of interest. Notwithstanding this, our previous participation in AdvisorDirect does not diminish our duty to seek best execution of trades for client accounts and we continue to believe that TD Ameritrade provides our clients with best execution.

## **Item 15 Custody**

As paying agent for our firm, your independent custodian will directly debit your account(s) for the payment of our advisory fees. This ability to deduct our advisory fees from your accounts causes our firm to exercise limited custody over your funds or securities. We do not have physical custody of any of your funds and/or securities. Your funds and securities will be held with a bank, broker-dealer, or other qualified custodian. You will receive account statements from the qualified custodian(s) holding your funds and securities at least quarterly. The account statements from your custodian(s) will indicate the amount of our advisory fees deducted from your account(s) each billing period. You should carefully review account statements for accuracy.

We are not affiliated with the custodian. The custodian does not supervise our firm, its agents or activities.

### **Standing Letter of Authorization and/or Transfers**

Our firm, or persons associated with our firm, may effect transfers from client accounts to one or more third parties designated, in writing, by the client without obtaining written client consent for each separate, individual transaction as long as the client has provided us with written authorization to do so. Such written authorization is known as a Standing Letter of Authorization. An adviser with authority to conduct such third party transfers has access to the client's assets, and therefore has custody of the client's assets in any related accounts.

However, we do not have to obtain a surprise annual audit, as we otherwise would be required to by reason of having custody, as long as we meet the following criteria:

1. You provide a written, signed instruction to the qualified custodian that includes the third party's name and address or account number at a custodian;
2. You authorize us in writing to direct transfers to the third party either on a specified schedule or



- from time to time;
3. Your qualified custodian verifies your authorization (e.g., signature review) and provides a transfer of funds notice to you promptly after each transfer;
  4. You can terminate or change the instruction;
  5. We have no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party;
  6. We maintain records showing that the third party is not a related party to us nor located at the same address as us; and
  7. Your qualified custodian sends you, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

We hereby confirm that we meet the above criteria.

## **Item 16 Investment Discretion**

You may grant our firm discretion over the selection and amount of securities to be purchased or sold for your account(s) without obtaining your consent or approval prior to each transaction. You may specify investment objectives, guidelines, and/or impose certain conditions or investment parameters for your account(s). For example, you may specify that the investment in any particular stock or industry should not exceed specified percentages of the value of the portfolio and/or restrictions or prohibitions of transactions in the securities of a specific industry or security. Refer to the Advisory Business section in this brochure for more information on our discretionary management services.

If you enter into non-discretionary arrangements with our firm, we will obtain your approval prior to the execution of any transactions for your account(s). You have an unrestricted right to decline to implement any advice provided by our firm on a non-discretionary basis.

## **Item 17 Voting Client Securities**

We will not vote proxies on behalf of your advisory accounts. At your request, we may offer you advice regarding corporate actions and the exercise of your proxy voting rights. If you own shares of applicable securities, you are responsible for exercising your right to vote as a shareholder.

In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward any electronic solicitations to vote proxies.

## **Item 18 Financial Information**

Our firm does not have any financial condition or impairment that would prevent us from meeting our contractual commitments to you. We do not take physical custody of client funds or securities, or serve as trustee or signatory for client accounts, and, we do not require the prepayment of more than \$1,200 in fees six or more months in advance. We have not filed a bankruptcy petition at any time in the past ten years. Therefore, we are not required to include a financial statement with this brochure.

## **Item 19 Requirements for State-Registered Advisers**

We are a federally registered investment adviser; therefore, we are not required to respond to this item.

## Item 20 Additional Information

### Trade Errors

An overriding principle in dealing with a trading error made by Robbins Wealth Management (or any other party to the trade other than the client) is that the client never pays for losses resulting from such errors. A trading error is a deviation from the applicable standard of care in the placement, execution, or settlement of a trade for a client account. In general, the following types of errors would be considered trading errors for the purposes of these procedures if the error resulted from a breach in the duty of care that the company owes to the client under the particular circumstances:

1. The purchase or sale of the wrong security or wrong amount of securities;
2. The over allocation of a security;
3. Purchase or sale of a security in violation of client investment guidelines or other failure to follow specific client directives; and
4. Purchase of securities not legally authorized for the client's account.

Errors caught and corrected before execution, and ticket re-writes and similar mistakes that incorrectly describe properly executed trades are not considered trade errors. In the event of a loss, the company will reimburse the appropriate party for the full amount of the loss, including transaction costs. In the event of an erroneous profit, TD Ameritrade will allocate it to charity if the proceeds are greater than \$100. If a gain is less than \$100, the profit is left in the company's error account and may ultimately be used to offset a trade error loss.

### Class Action Lawsuits

We utilize a third party securities class action claim recovery service, Chicago Clearing Corporation, to monitor, track, and recover class action claims on our clients' behalf. We will assist in recovering claim settlements on your behalf, which includes verifying personal information. Please refer to our privacy policy for additional information regarding personal information that we share. Chicago Clearing Corporation (CCC) charges a 20% recovery and processing fee. CCC is not your legal counsel. You should engage an attorney if you need legal assistance with a class action suit. All clients have the ability to opt out of this arrangement at any time.