

Firm Brochure

(Part 2A of Form ADV)

ROBINSON INVESTMENT GROUP, INC.

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This brochure provides information about the qualifications and business practices of ROBINSON INVESTMENT GROUP, INC. If you have any questions about the contents of this brochure, please contact us at: 615-242-3447, or by email at: RIGROBIN@ROBINSONINVESTMENT.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 ROBINSON INVESTMENT GROUP is available on the SEC's website at www.adviserinfo.sec.gov

March 2, 2020

Material Changes

Annual Update

The Material Changes section of this brochure will be updated annually when material changes occur since the previous release of the Firm Brochure.

Material Changes since the Last Update

The U.S. Securities and Exchange Commission issued a final rule in July 2010 requiring advisers to provide a Firm Brochure in narrative "plain English" format. The new final rule specifies mandatory sections and organization.

Full Brochure Available

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: 615-242-3447 or by email at: RIGROBIN@ROBINSONINVESTMENT.COM.

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Advisory Business

Firm Description

ROBINSON INVESTMENT GROUP, INC., ("FIRM NAME") was founded in 1996.

ROBINSON INVESTMENT GROUP, INC. provides personalized investment management to individuals, pension and profit sharing plans, trusts, estates, charitable organizations and small businesses. Advice is provided through consultation with the client and may include: determination of financial objectives, cash flow management, investment management, education funding, and retirement planning.

ROBINSON INVESTMENT GROUP, INC. is strictly a fee-only financial and investment management firm. The firm does not sell annuities, insurance, stocks, bonds, mutual funds, limited partnerships, or other commissioned products. The firm is not affiliated with entities that sell financial products or securities. No commissions in any form are accepted. No finder's fees are accepted.

The initial meeting, which may be by telephone, is free of charge and is considered an exploratory interview to determine the extent to which investment management may be beneficial to the client.

Principal Owners

Russell L. Robinson is a 52.93% stockholder. James Loden is a 7.86% stockholder. Ann L. Roberts is a 7.86% stockholder. Joan R. Downey is a 6.18% stockholder.

Types of Advisory Services

ROBINSON INVESTMENT GROUP, INC. provides investment supervisory services, also known as asset management services; manages investment advisory accounts not involving investment supervisory services; furnishes investment advice through consultations; issues periodicals about securities by subscription; issues special reports about securities; and issues, charts, graphs, formulas, or other devices which clients may use to evaluate securities.

As of DECEMBER 31, 2019, ROBINSON INVESTMENT GROUP, INC. manages approximately \$68 MILLION in assets for approximately 165 clients. Approximately \$45 MILLION is managed on a discretionary basis, and \$23 MILLION is managed on a non-discretionary basis.

Tailored Relationships

The goals and objectives for each client are documented in our client relationship management system. Investment policy statements are created

that reflect the stated goals and objective. Clients may impose restrictions on investing in certain securities or types of securities.

Agreements may not be assigned without client consent.

Types of Agreements

The following agreements define the typical client relationships.

Investment Management Agreement

An Investment Management Agreement may be executed.

Assets are invested primarily in individually managed stock portfolios. Stocks are purchased through a brokerage account when appropriate. The brokerage firm charges a fee for stock and bond trades. ROBINSON INVESTMENT GROUP, INC. does not receive any compensation, in any form, from the brokerage firm.

Investments may also include warrants, corporate debt securities, commercial paper, certificates of deposit, municipal securities, investment company securities (mutual fund shares), exchange traded funds, U.S. Government securities, options contracts, futures contracts, and interests in partnerships.

Initial public offerings (IPO's) are not available through ROBINSON INVESTMENT GROUP, INC.

The annual fee for an Investment Management Agreement is based on the assets under management as detailed in the following fee schedule:

INVESTMENT MANAGEMENT SERVICES

EQUITY MANAGEMENT FEES

FIRST \$5,000,000	1% of Assets Under Management
NEXT \$5,000,000	0.5% of Assets Under Management
OVER \$10,000,000	0.35% of Assets Under Management

FIXED INCOME MANAGEMENT FEES

0.50% of Assets Under Management

Termination of Agreement

A Client may terminate any of the aforementioned agreements at any time by notifying ROBINSON INVESTMENT GROUP, INC. in writing and paying the

rate for the time spent on the investment advisory engagement prior to notification of termination. If the client made an advance payment, ROBINSON INVESTMENT GROUP, INC. will refund any unearned portion of the advance payment.

ROBINSON INVESTMENT GROUP, INC. may terminate any of the aforementioned agreements at any time by notifying the client in writing. If the client made an advance payment, ROBINSON INVESTMENT GROUP, INC. will refund any unearned portion of the advance payment.

Fees and Compensation

Description

ROBINSON INVESTMENT GROUP, INC. bases its fees on a percentage of assets under management.

Fees are *NOT NEGOTIABLE*.

Fee Billing

Investment management fees are billed quarterly, *ARREARS*, meaning that we invoice you *AFTER* the three-month billing period has *ENDED*. Payment in full is expected upon invoice presentation. Fees are usually deducted from a designated client account to facilitate billing. The client must consent in advance to direct debiting of their investment account.

Other Fees

Custodians may charge transaction fees on purchases or sales of certain mutual funds and exchange-traded funds. These transaction charges are usually small and incidental to the purchase or sale of a security. The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security.

ROBINSON INVESTMENT GROUP, INC., in its sole discretion, may waive its minimum fee and/or charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients, etc.).

Expense Ratios

Mutual funds generally charge a management fee for their services as investment managers. The management fee is called an expense ratio. For example, an expense ratio of 0.50 means that the mutual fund company charges 0.5% for their services. These fees are in addition to the fees paid by you to ROBINSON INVESTMENT GROUP, INC.

Performance figures quoted by mutual fund companies in various publications are after their fees have been deducted.

Past Due Accounts and Termination of Agreement

ROBINSON INVESTMENT GROUP, INC. reserves the right to stop work on any account that is more than 180 days overdue. Any unused portion of fees collected in advance will be refunded in 30 days.

Performance-Based Fees

Sharing of Capital Gains

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

ROBINSON INVESTMENT GROUP, INC. does not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

Types of Clients

Description

ROBINSON INVESTMENT GROUP, INC. generally provides investment advice to individuals, banks or thrift institutions, investment companies, pension and profit sharing plans, trusts, estates, or charitable organizations, corporations or business entities.

Client relationships vary in scope and length of service.

Account Minimums

The minimum account size is \$100,000 of assets under management, which equates to an annual fee of \$1,000.00.

ROBINSON INVESTMENT GROUP, INC. has the discretion to waive the account minimum. Accounts of less than \$100,000 may be set up when the client and the advisor anticipate the client will add additional funds to the accounts bringing the total to \$100,000 within a reasonable time. Other exceptions will apply to employees of ROBINSON INVESTMENT GROUP, INC. and their relatives, or relatives of existing clients.

Clients receiving ongoing asset management services will not be assessed a minimum annual fee. 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.

Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis

Security analysis methods may include charting, fundamental analysis, technical analysis, and cyclical analysis.

The main sources of information include financial newspapers and magazines, inspections of corporate activities, research materials prepared by others, corporate rating services, timing services, annual reports, prospectuses, filings with the Securities and Exchange Commission, and company press releases.

Other sources of information that ROBINSON INVESTMENT GROUP, INC. may use include Thomson Reuters Baseline Database, Value Line, Morningstar Principia mutual fund information, Morningstar Principia stock information, Charles Schwab & Company's "SchwabLink" service, Advisor Intelligence, and the World Wide Web.

Investment Strategies

The primary investment strategy used on client accounts is based upon our value equity research generated internally from Thomson Reuters Baseline Database. The average portfolio will consist of 35 to 40 individual stocks. The portfolios are diversified according to industry and may overweight certain industries based on business cycles and interest rate yield structure.

The investment strategy for a specific client is based on the objectives stated by the client during consultations. The client may change these objectives at any time. Each client executes an Investment Policy Statement that documents their objectives and their desired investment strategy.

Other strategies may include long-term purchases, short-term purchases, trading, margin transactions, and option writing (including covered options, uncovered options or spreading strategies).

Risk of Loss

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.

- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

Disciplinary Information

Legal and Disciplinary

The firm and its employees have not been involved in legal or disciplinary events related to past or present investment clients.

Other Financial Industry Activities and Affiliations

Financial Industry Activities

ROBINSON INVESTMENT GROUP, INC. is NOT registered as a securities broker-dealer, NOR a futures commission merchant, commodity pool operator or commodity trading advisor.

Affiliations

ROBINSON INVESTMENT GROUP, INC. has NO affiliated firms that may create conflicts of interest with any outside financial firms.

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

Code of Ethics

The employees of ROBINSON INVESTMENT GROUP, INC. have committed to a Code of Ethics that is available for review by clients and prospective clients upon request. The firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

Participation or Interest in Client Transactions

ROBINSON INVESTMENT GROUP, INC. and its employees may buy or sell securities that are also held by clients. Employees may not trade their own securities ahead of client trades. Employees comply with the provisions of the ROBINSON INVESTMENT GROUP, INC. *Compliance Manual*.

Personal Trading

The Chief Compliance Officer of ROBINSON INVESTMENT GROUP is Russell L. Robinson. He reviews all employee trades each quarter. His trades are reviewed by Paul Heer. The personal trading reviews ensure that the personal trading of employees does not affect the markets, and that clients of the firm receive preferential treatment. Since most employee trades are small mutual fund trades or exchange-traded fund trades, the trades do not affect the securities markets.

Brokerage Practices

Selecting Brokerage Firms

ROBINSON INVESTMENT GROUP, INC. does not have any affiliation with product sales firms. Specific custodian recommendations are made to Clients based on their need for such services. ROBINSON INVESTMENT GROUP, INC. recommends custodians based on the proven integrity and financial responsibility of the firm and the best execution of orders at reasonable commission rates.

ROBINSON INVESTMENT GROUP, INC. recommends discount brokerage firms and trust companies (qualified custodians), such as Charles Schwab, and Co.

ROBINSON INVESTMENT GROUP, INC. *DOES NOT* receive fees or commissions from any of these arrangements.

Best Execution

ROBINSON INVESTMENT GROUP, INC. reviews the execution of trades at each custodian each quarter. The review is documented in the ROBINSON INVESTMENT GROUP, INC. *Compliance Manual*. Trading fees charged by

the custodians is also reviewed on a quarterly basis. ROBINSON INVESTMENT GROUP, INC. does not receive any portion of the trading fees.

Soft Dollars

ROBINSON INVESTMENT GROUP, INC. pays no soft dollar commissions for research or other services.

Order Aggregation

Orders are placed with no client preferential.

Review of Accounts

Periodic Reviews

Account reviews are performed quarterly by advisor Russell L. Robinson, President and Chief Compliance Officer. Account reviews are performed more frequently when market conditions dictate.

Review Triggers

Other conditions that may trigger a review are changes in the tax laws, new investment information, and changes in a client's own situation.

Regular Reports

Account reviewers are members of the firm's Investment Committee. They 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.

Clients receive periodic communications on at least an annual basis. Investment Management clients receive written quarterly updates. The written updates may include a portfolio statement, and a summary of objectives and progress towards meeting those objectives.

Client Referrals and Other Compensation

Incoming Referrals

ROBINSON INVESTMENT GROUP, INC. has been fortunate to receive many client referrals over the years. The referrals came from current clients, estate planning attorneys, accountants, employees, personal friends of employees and other similar sources. The firm does not compensate referring parties for these referrals.

Referrals Out

ROBINSON INVESTMENT GROUP, INC. does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

Other Compensation

ROBINSON INVESTMENT GROUP, INC. only receives investment management fees.

Custody

Account Statements

All assets are held at qualified custodians, which means the custodians provide account statements directly to clients at their address of record at least quarterly.

Performance Reports

Clients are urged to compare the account statements received directly from their custodians to the performance report statements provided by ROBINSON INVESTMENT GROUP, INC.

Investment Discretion

Discretionary Authority for Trading

ROBINSON INVESTMENT GROUP, INC. accepts discretionary authority to manage securities accounts on behalf of clients. ROBINSON INVESTMENT GROUP, INC. has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. However, ROBINSON INVESTMENT GROUP, INC. consults with the client prior to each trade to obtain concurrence if a blanket trading authorization has not been given.

The client approves the custodian to be used and the commission rates paid to the custodian. ROBINSON INVESTMENT GROUP, INC. does not receive any portion of the transaction fees or commissions paid by the client to the custodian on certain trades.

Discretionary trading authority facilitates placing trades in your accounts on your behalf so that we may promptly implement the investment policy that you have approved in writing.

Limited Power of Attorney

A limited power of attorney is a trading authorization for this purpose. You sign a limited power of attorney so that we may execute the trades that you have approved.

Voting Client Securities

Proxy Votes

Unless the client designates otherwise, ROBINSON INVESTMENT GROUP, INC. votes proxies for securities over which it maintains discretionary

authority consistent with its proxy voting policy. A copy of ROBINSON INVESTMENT GROUP, INC.'s proxy voting policy is available upon request.

Financial Information

Financial Condition

ROBINSON INVESTMENT GROUP, INC. does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients.

A balance sheet is not required to be provided because ROBINSON INVESTMENT GROUP, INC. does not serve as a custodian for client funds or securities, and does not require prepayment of fees of more than \$1,200 per client, and six months or more in advance.

Business Continuity Plan

General

ROBINSON INVESTMENT GROUP, INC. has a Business Continuity Plan in place that provides detailed steps to mitigate and recover from the loss of office space, communications, services or key people.

Disasters

The Business Continuity Plan covers natural disasters such as snow storms, hurricanes, tornados, and flooding. The Plan covers man-made disasters such as loss of electrical power, loss of water pressure, fire, bomb threat, nuclear emergency, chemical event, biological event, T-1 communications line outage, Internet outage, railway accident and aircraft accident. Electronic files are backed up daily and archived offsite.

Alternate Offices

Alternate offices are identified to support ongoing operations in the event the main office is unavailable. It is our intention to contact all clients within five days of a disaster that dictates moving our office to an alternate location.

Loss of Key Personnel

ROBINSON INVESTMENT GROUP, INC. currently does not have an agreement with another adviser in the event of serious death or disability.

Information Security Program

Information Security

ROBINSON INVESTMENT GROUP, INC. maintains an information security program to reduce the risk that your personal and confidential information may be breached.

Privacy Notice

ROBINSON INVESTMENT GROUP, INC. is committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us.

The categories of nonpublic information that we collect from you may include information about your personal finances, information about your health to the extent that it is needed for the financial planning process, information about transactions between you and third parties, and information from consumer reporting agencies, e.g., credit reports. We use this information to help you meet your personal financial goals.

With your permission, we disclose limited information to attorneys, accountants, and mortgage lenders with whom you have established a relationship. You may opt out from our sharing information with these nonaffiliated third parties by notifying us at any time by telephone, mail, fax, email, or in person. With your permission, we share a limited amount of information about you with your brokerage firm in order to execute securities transactions on your behalf.

We maintain a secure office to ensure that your information is not placed at unreasonable risk. We employ a firewall barrier, secure data encryption techniques and authentication procedures in our computer environment.

We do not provide your personal information to mailing list vendors or solicitors. We require strict confidentiality in our agreements with unaffiliated third parties that require access to your personal information, including financial service companies, consultants, and auditors. Federal and state securities regulators may review our Company records and your personal records as permitted by law.

Personally identifiable information about you will be maintained while you are a client, and for the required period thereafter that records are required to be maintained by federal and state securities laws. After that time, information may be destroyed.

We will notify you in advance if our privacy policy is expected to change. We are required by law to deliver this *Privacy Notice* to you annually, in writing.

Education and Business Standards

ROBINSON INVESTMENT GROUP, INC. requires that advisors in its employ have a bachelor's degree and further coursework demonstrating knowledge of financial planning and tax planning. Examples of acceptable coursework include: an MBA, a CFP®, a CFA, a ChFC, JD, CTFA, EA or CPA. Additionally, advisors must have work experience that demonstrates their aptitude for financial planning and investment management.

Professional Certifications

Employees are encouraged to earn certifications and credentials that are required to be explained in further detail.

have earned certifications and credentials that are required to be explained in further detail.

Chartered Financial Analyst (CFA): Chartered Financial Analysts are licensed by the CFA Institute to use the CFA mark. CFA certification requirements:

- Hold a bachelor's degree from an accredited institution or have equivalent education or work experience.
- Successful completion of all three exam levels of the CFA Program.
- Have 48 months of acceptable professional work experience in the investment decision-making process.
- Fulfill society requirements, which vary by society. Unless you are upgrading from affiliate membership, all societies require two sponsor statements as part of each application; these are submitted online by your sponsors.
- Agree to adhere to and sign the Member's Agreement, a Professional Conduct Statement, and any additional documentation requested by CFA Institute.

Russell L. Robinson, President and Chief Compliance Officer

Educational Background:

Date of Birth: 1959

B.S. in Finance, University of Alabama, 1981.

Business Experience:

Tennessee Consolidated Retirement System, 1983-1985

Sovran Bank, Richmond, Va. 1985-1986
Underwood, Neuhaus, & Co., 1986-1987
Dominion Trust Company, 1987-1990.
Nashville Capital Corp. 1990-1996.
Robinson Investment Group, Inc. 1996 til Present.

Other Business Activities: None

Additional Compensation: None

Supervision: Russell Robinson is the President and Chief Compliance Officer.

Paul Heer, CPA and Principal

Educational Background:

Date of Birth: 1936

B.S., Accounting, University of Notre Dame, 1957

Business Experience:

Equitable Securities, Nashville, Tn. 1968-1972

First American National Bank, Nashville, Tn. 1972-1980

Third National/Suntrust, Nashville, Tn. 1980-1997.

Robinson Investment Group, Inc. Brentwood, Tn 1997-Present.

Other Business Activities: None

Additional Compensation: None

Supervision: Russell L. Robinson, President and Chief Compliance Officer. Paul Heer is supervised by Russell Robinson, President. He reviews Mr. Heer's work through frequent office interactions. He also reviews Mr. Heer's activities through our client relationship management system.

Russell Robinson's contact information:

Phone: 615-242-3447

Email: rigrobin@robinsoninvestment.com

Amy W. Campbell, Principal

Educational Background:

Date of Birth: 1957

B.A., University of Tennessee, 1979.

Business Experience:

Metropolitan Federal, Nashville, Tn. 1983-1987

Third National/Suntrust, Nashville, Tn. 1987-1996

Robinson Investment Group, Inc. Brentwood, Tn. 1996-Present

Supervision: Russell L. Robinson, President and Chief Compliance Officer. Amy Campbell is supervised by Russell Robinson, President. He reviews Mrs. Campbell work through frequent office interactions. He also reviews Mrs. Campbell's activities through our client relationship management system.

Russell Robinson's contact information:

Phone: 615-242-3447

Email: rigrobin@robinsoninvestment.com

Trent Green, Vice President, Investment Manager

Educational Background

Date of Birth: 1971

B.S., David Lipscomb University, 1995

Business Experience:

Prudential Securities, Nashville, Tn. 1996-2003

Morgan Stanley, Nashville, Tn. 2003-2005.

Robinson Investment Group, Inc, 2005-Present

Supervision: Russell L. Robinson, President and Chief Compliance Officer. Trent Green is supervised by Russell Robinson, President. He reviews Mr. Green's work through frequent office interactions. He also reviews Mr. Green's activities through our client relationship management system.

Russell Robinson's contact information:

Phone: 615-242-3447

Email: rigrobin@robinsoninvestment.com