



Item 1. Cover Page

Robo Advisor, Inc.

Form ADV Part 2A – Appendix 1

ROBO ADVISOR - WRAP FEE BROCHURE

255 Primera Boulevard
Suite 160
Lake Mary, FL 32746-2168
Phone: (407) 499-0050
compliance@roboadvisor.com

March 30, 2023

This wrap fee program brochure provides information about the qualifications and business practices of Robo Advisor, Inc. (hereinafter “Robo Advisor”), a registered investment adviser. Registration does not imply a certain level of skill or training but only indicates that Robo Advisor has registered its business with state and federal regulatory authorities, including the United States Securities and Exchange Commission. If you have any questions about the contents of this brochure, please contact us at (407) 499-0050. 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 Robo Advisor also is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2. Material Changes

There are no material changes to report currently.

The material changes discussed above are only those changes that have been made to this WRAP fee program brochure since the firm's last annual update of the brochure. The date of the last annual update of the WRAP fee program brochure was March 31, 2022.

Item 3. Table of Contents

Item 2 Material Changes.....	2
Item 3 Table of Contents	3
Item 4 Services, Fees and Compensation	4
Item 5 Account Requirements and Types of Clients.....	22
Item 6 Portfolio Manager Selection and Evaluation.....	22
Item 7 Client Information Provided to Portfolio Managers	23
Item 8 Client Contact with Portfolio Managers.....	23
Item 9 Additional Information	23

Item 4. Services, Fees, and Compensation

Robo Advisor Inc.'s ("Robo Advisor", Robo Advisor™, "ROBOADVISOR.COM" or the "Advisor") Robo Advisor Wrap Fee Program provides six Investment Philosophies using an all-inclusive fee structure designed to address the investment needs of investors with different investment objectives and risk profiles. They are the Dynamic Growth Portfolio, Growth Portfolio, Growth & Income Portfolio, Income & Growth Portfolio, Moderate Income Portfolio, and the Balanced Income Portfolio. Following is a discussion of each of these investment portfolios.

Dynamic Growth Portfolio Investment Philosophy

The Dynamic Growth Portfolio is an actively managed and fluid ensemble of various securities blended within a tactically dynamic investment philosophy. This investment philosophy includes sophisticated research, quantitative and qualitative analysis, esoteric securities selection, built-in cost constraints, proprietary allocation methods as well as the strategic rotating, overweighting, and underweighting of select sectors and styles. This level of effort and activity is built around providing the greatest possibility of achieving benchmark performance standards in both up and down markets.

The investment manager and/or Advisor have full discretion to decide on portfolio investments. The investment manager(s) and/or Advisor will review portfolio holdings, economic indicators, and other relevant information on a quarterly basis to assess the attainment of benchmark performance standards. The advisor may inform the Investor of scheduled changes recommended for the upcoming quarter either by telephone, mail, or some form of electronic communication. However, the Investor understands that certain events may occur intra-quarter which may require Investment Manager(s) and/or Advisor to institute unscheduled changes in allocation or diversification in an attempt to de-risk the portfolio to preserve asset value or to capitalize on unique investment opportunities.

Investment and Allocation Objectives

The main objective of this profile is to provide aggressive growth and maximum returns for the investor's assets without providing current income while meeting a stated benchmark performance principle. The benchmark performance principle shall be to attempt to attain an average annual rate of return (over a period of ten years or more) equal to the performance benchmark described below. Portfolios in this range may have substantial fluctuations in value from year to year – with the possibility that most, or all, of the money invested could be lost. The equity allocation range of the portfolio will vary between thirty to ninety-nine percent.

Performance Benchmark

The "smart" Aggressive Growth benchmark is dynamically adjusted to the comparative index weightings of the underlying securities within the respective portfolio allocation.

Time Horizon

For the purposes of planning, the time horizon for these investments is to be ten (10) years or more. Capital values do fluctuate over shorter periods, and the Investor should recognize that the possibility of capital loss does exist. However, historical asset class return data suggests that the risk of principal loss over short-term holding periods can be minimized with the long-term investment mix employed under this Investment Policy Statement.

Risk Profile

Investment theory and historical capital market return data suggest that, over long periods of time, there is a relationship between the level of risk assumed and the level of return that can be expected in an investment program. In general, higher risk (e.g., volatility of return) is associated with a higher return.

Given this relationship between risk and return, a fundamental step in determining the investment policy for the Portfolio is the determination of an appropriate risk profile. There are two primary factors that affect the Investor's risk profile:

1. Financial ability to accept risk within the investment program, and;
2. Willingness to accept return volatility.

Taking these two factors into account, the Investor utilizes a Robo Advisor™ investment calculator to determine his/her risk profile or has rated his/her own risk profile as **Aggressive**. The aggressive risk profile is appropriate for investors who have both a high tolerance for risk and a long investment time horizon of ten (10) years or more. Accordingly, The Robo Advisor WRAP Fee model which best corresponds to this description is the Dynamic Growth Portfolio. The Investor recognizes that higher returns involve some volatility and has indicated a willingness to tolerate declines in the value of this Portfolio of between 0% and 40% in a given year.

Liquidity

The investor has not expressed a need to always maintain a minimum level of cash or cash equivalents in the Investor's Portfolio. However, at least 1% of the Portfolio shall always be maintained in cash or cash equivalents for emergencies or opportunities.

Diversification

Investment of the Investor's funds shall be diversified across a range of individual marketable securities or packaged products (for example, mutual funds, separately managed accounts, or unit investment trusts) to reduce risk and enhance returns. The specific categories of permitted and prohibited investments for each portfolio are outlined in separate sections to provide a

clear understanding of the investment options and restrictions. Please refer to the 'Permitted Asset Classes and Security Types' section for a detailed list of allowable investments for this portfolio, and the 'Prohibited Asset Classes and Security Types' section for a list of investments that are not allowed for this portfolio.

Growth Portfolio Investment Philosophy

The Growth Portfolio is an actively managed and fluid ensemble of various securities blended within a tactically dynamic investment philosophy. This investment philosophy includes sophisticated research, quantitative and qualitative analysis, esoteric securities selection, built-in cost constraints, proprietary allocation methods as well as the strategic rotating, overweighting, and underweighting of select sectors and styles. This level of effort and activity is built around providing the greatest possibility of achieving benchmark performance standards in both up and down markets.

The investment manager and/or Advisor have full discretion to decide on portfolio investments. The investment manager(s) and/or Advisor will review portfolio holdings, economic indicators, and other relevant information on a quarterly basis to assess attainment of benchmark performance standard. Advisor may inform Investor of scheduled changes recommended for the upcoming quarter either by telephone, mail, or some form of electronic communication. However, the Investor understands that certain events may occur intra-quarter which may require Investment Manager(s) and/or Advisor to institute unscheduled changes in allocation or diversification in an attempt to de-risk the portfolio to preserve asset value or to capitalize on unique investment opportunities.

Investment and Allocation Objectives

The main objective of this portfolio is to provide capital appreciation while meeting a stated benchmark performance principle. The benchmark performance principle shall be to attempt to attain an average annual rate of return (over a period of seven to ten years) equal to the performance benchmark described below. Portfolios in this range may have moderate fluctuations in their portfolio values, with the possibility of losing a substantial amount of the money invested. The equity allocation range of the portfolio will vary between thirty to eighty-five percent.

Performance Benchmark

The “smart” Growth benchmark is dynamically adjusted to the comparative index weightings of the underlying securities within the respective portfolio allocation.

Time Horizon

For the purposes of planning, the time horizon for these investments is to be seven to ten years

(7-10). Capital values do fluctuate over shorter periods, and the Investor should recognize that the possibility of capital loss does exist. However, historical asset class return data suggests that the risk of principal loss over short-term holding periods can be minimized with the long-term investment mix employed under this Investment Policy Statement.

Risk Profile

Investment theory and historical capital market return data suggest that, over long periods of time, there is a relationship between the level of risk assumed and the level of return that can be expected in an investment program. In general, higher risk (e.g., volatility of return) is associated with a higher return.

Given this relationship between risk and return, a fundamental step in determining the investment policy for the Portfolio is the determination of an appropriate risk profile. There are two primary factors that affect the Investor's risk profile:

1. Financial ability to accept risk within the investment program, and;
2. Willingness to accept return volatility.

Taking these two factors into account, the Investor utilizes a Robo Advisor™ investment calculator to determine his/her risk profile or has rated his/her own risk profile as **Moderately Aggressive**. The moderately aggressive risk profile is designed for investors with a high tolerance for risk and a longer time horizon of seven to ten years (7-10 years). Accordingly, The Robo Advisor WRAP Fee model which best corresponds to this description is the Growth Portfolio. The Investor recognizes that higher returns involve some volatility and has indicated a willingness to tolerate declines in the value of this Portfolio of between 0% and 30% in a given year.

Liquidity

The investor has not expressed a need to always maintain a minimum level of cash or cash equivalents in the Investor's Portfolio. However, at least 2% of the Portfolio shall always be maintained in cash or cash equivalents for emergencies or opportunities.

Diversification

Investment of the Investor's funds shall be diversified across a range of individual marketable securities or packaged products (for example, mutual funds, separately managed accounts, or unit investment trusts) to reduce risk and enhance returns. The specific categories of permitted and prohibited investments for each portfolio are outlined in separate sections to provide a clear understanding of the investment options and restrictions. Please refer to the 'Permitted Asset Classes and Security Types' section for a detailed list of allowable investments for this portfolio, and the 'Prohibited Asset Classes and Security Types' section for a list of investments that are not allowed for this portfolio.

Growth & Income Portfolio Investment Philosophy

The Growth & Income Portfolio is an actively managed and fluid ensemble of various securities blended within a tactically dynamic investment philosophy. This investment philosophy includes sophisticated research, quantitative and qualitative analysis, esoteric securities selection, built-in cost constraints, proprietary allocation methods as well as the strategic rotating, overweighting, and underweighting of select sectors and styles. This level of effort and activity is built around providing the greatest possibility of achieving benchmark performance standards in both up and down markets.

The investment manager and/or Advisor have full discretion to decide on portfolio investments. The investment manager(s) and/or Advisor will review portfolio holdings, economic indicators, and other relevant information on a quarterly basis to assess the attainment of benchmark performance standards. The advisor may inform the Investor of scheduled changes recommended for the upcoming quarter either by telephone, mail, or some form of electronic communication. However, the Investor understands that certain events may occur intra-quarter which may require Investment Manager(s) and/or Advisor to institute unscheduled changes in allocation or diversification in an attempt to de-risk the portfolio to preserve asset value or to capitalize on unique investment opportunities.

Investment and Allocation Objectives

The main objective of this profile is to achieve steady portfolio growth and current income while meeting a stated benchmark performance principle. The benchmark performance principle shall be to attempt to attain an average annual rate of return (over a period of seven to ten years) equal to the performance benchmark described below. Portfolios in this range should be expected to limit fluctuations and the possibility of loss to less than those of the overall stock markets. The equity allocation range of the portfolio will vary between twenty-five to seventy-five percent.

Performance Benchmark

The “smart” Moderate Growth benchmark is dynamically adjusted to the comparative index weightings of the underlying securities within the respective portfolio allocation.

Time Horizon

For the purposes of planning, the time horizon for these investments is to be seven to ten years (7-10). Capital values do fluctuate over shorter periods, and the Investor should recognize that the possibility of capital loss does exist. However, historical asset class return data suggests that the risk of principal loss over short-term holding periods can be minimized with the long-term investment mix employed under this Investment Policy Statement.

Risk Profile

Investment theory and historical capital market return data suggest that, over long periods of time, there is a relationship between the level of risk assumed and the level of return that can be expected in an investment program. In general, higher risk (e.g., volatility of return) is associated with a higher return.

Given this relationship between risk and return, a fundamental step in determining the investment policy for the Portfolio is the determination of an appropriate risk profile. There are two primary factors that affect the Investor's risk profile:

1. Financial ability to accept risk within the investment program, and;
2. Willingness to accept return volatility.

Taking these two factors into account, the Investor utilizes a Robo Advisor™ investment calculator to determine his/her risk profile or has rated his/her own risk profile as **Moderate Growth**. An investor in the moderate growth profile will have a higher tolerance for risk and/or a longer time horizon of seven to ten years (7-10 years). Accordingly, The Robo Advisor WRAP Fee model which best corresponds to this description is the Growth & Income Portfolio. The Investor recognizes that higher returns involve some volatility and has indicated a willingness to tolerate declines in the value of this Portfolio of between 0% and 25% in a given year.

Liquidity

The investor has not expressed a need to always maintain a minimum level of cash or cash equivalents in the Investor's Portfolio. However, at least 3% of the Portfolio shall always be maintained in cash or cash equivalents for emergencies or opportunities.

Diversification

Investment of the Investor's funds shall be diversified across a range of individual marketable securities or packaged products (for example, mutual funds, separately managed accounts, or unit investment trusts) to reduce risk and enhance returns. The specific categories of permitted and prohibited investments for each portfolio are outlined in separate sections to provide a clear understanding of the investment options and restrictions. Please refer to the 'Permitted Asset Classes and Security Types' section for a detailed list of allowable investments for this portfolio, and the 'Prohibited Asset Classes and Security Types' section for a list of investments that are not allowed for this portfolio.

Income & Growth Portfolio Investment Philosophy

The Income & Growth Portfolio is an actively managed and fluid ensemble of various securities blended within a tactically dynamic investment philosophy. This investment philosophy includes sophisticated research, quantitative and qualitative analysis, esoteric securities selection, built-in cost constraints, proprietary allocation methods as well as the strategic

rotating, overweighting, and underweighting of select sectors and styles. This level of effort and activity is built around providing the greatest possibility of achieving benchmark performance standards in both up and down markets.

The investment manager and/or Advisor have full discretion to decide on portfolio investments. The investment manager(s) and/or Advisor will review portfolio holdings, economic indicators, and other relevant information on a quarterly basis to assess the attainment of benchmark performance standards. The advisor may inform the Investor of scheduled changes recommended for the upcoming quarter either by telephone, mail, or some form of electronic communication. However, the Investor understands that certain events may occur intra-quarter which may require Investment Manager(s) and/or Advisor to institute unscheduled changes in allocation or diversification in an attempt to de-risk the portfolio to preserve asset value or to capitalize on unique investment opportunities.

Investment and Allocation Objectives

The main objective of this profile is to generate moderate current income and capital growth while meeting a stated benchmark performance principle. The benchmark performance principle shall be to attempt to attain an average annual rate of return (over a period of at least 5-7 years) equal to the performance benchmark described below. Portfolios in this range should expect fluctuations in value to be far less than those of the overall stock markets. The equity allocation range of the portfolio will vary between twenty to seventy percent.

Performance Benchmark

The “smart” Balanced benchmark is dynamically adjusted to the comparative index weightings of the underlying securities within the respective portfolio allocation.

Time Horizon

For the purposes of planning, the time horizon for these investments is to be in five to seven years (5-7). Capital values do fluctuate over shorter periods, and the Investor should recognize that the possibility of capital loss does exist. However, historical asset class return data suggests that the risk of principal loss over short-term holding periods can be minimized with the long-term investment mix employed under this Investment Policy Statement.

Risk Profile

Investment theory and historical capital market return data suggest that, over long periods of time, there is a relationship between the level of risk assumed and the level of return that can be expected in an investment program. In general, higher risk (e.g., volatility of return) is associated with a higher return.

Given this relationship between risk and return, a fundamental step in determining the investment policy for the Portfolio is the determination of an appropriate risk profile. There are two primary factors that affect the Investor's risk profile:

1. Financial ability to accept risk within the investment program, and;
2. Willingness to accept return volatility.

Taking these two factors into account, the Investor utilizes a Robo Advisor™ investment calculator to determine his/her risk profile or has rated his/her own risk profile as **Balanced**. An investor in the balanced profile will be able to tolerate short-term risk to gain long-term capital growth and/or has a moderate time horizon of five to seven years (5-7 years). Accordingly, The Robo Advisor WRAP Fee model which best corresponds to this description is the Income & Growth Portfolio. The Investor recognizes that higher returns involve some volatility and has indicated a willingness to tolerate declines in the value of this Portfolio of between 0% and 20% in a given year.

Liquidity

The investor has not expressed a need to always maintain a minimum level of cash or cash equivalents in the Investor's Portfolio. However, at least 4% of the Portfolio shall always be maintained in cash or cash equivalents for emergencies or opportunities.

Diversification

Investment of the Investor's funds shall be diversified across a range of individual marketable securities or packaged products (for example, mutual funds, separately managed accounts, or unit investment trusts) to reduce risk and enhance returns. The specific categories of permitted and prohibited investments for each portfolio are outlined in separate sections to provide a clear understanding of the investment options and restrictions. Please refer to the 'Permitted Asset Classes and Security Types' section for a detailed list of allowable investments for this portfolio, and the 'Prohibited Asset Classes and Security Types' section for a list of investments that are not allowed for this portfolio.

Moderate Income Portfolio Investment Philosophy

The Moderate-Income Portfolio is an actively managed and fluid ensemble of various securities blended within a tactically dynamic investment philosophy. This investment philosophy includes sophisticated research, quantitative and qualitative analysis, esoteric securities selection, built-in cost constraints, proprietary allocation methods as well as the strategic rotating, overweighting, and underweighting of select sectors and styles. This level of effort and activity is built around providing the greatest possibility of achieving benchmark performance standards in both up and down markets.

The investment manager and/or Advisor have full discretion to decide on portfolio investments. The investment manager(s) and/or Advisor will review portfolio holdings, economic indicators, and other relevant information on a quarterly basis to assess the attainment of benchmark performance standards. The advisor may inform the Investor of scheduled changes recommended for the upcoming quarter either by telephone, mail, or some form of electronic communication. However, the Investor understands that certain events may occur intra-quarter which may require Investment Manager(s) and/or Advisor to institute unscheduled changes in allocation or diversification in an attempt to de-risk the portfolio to preserve asset value or to capitalize on unique investment opportunities.

Investment and Allocation Objectives

The main objective of this profile is to achieve current income and conservative appreciation sufficient to outpace inflation while meeting a stated benchmark performance principle. The benchmark performance principle shall be to attempt to attain an average annual rate of return (over a period of at least 10 years) equal to the performance benchmark described below. Portfolios in this range should expect fluctuations in the value of the portfolio and negative returns can occur from year to year. The equity allocation range of the portfolio will vary between fifteen to sixty-five percent.

Performance Benchmark

The “smart” Moderate Income benchmark is dynamically adjusted to the comparative index weightings of the underlying securities within the respective portfolio allocation.

Time Horizon

For the purposes of planning, the time horizon for these investments is to be three to seven years (3-7). Capital values do fluctuate over shorter periods, and the Investor should recognize that the possibility of capital loss does exist. However, historical asset class return data suggests that the risk of principal loss over short-term holding periods can be minimized with the long-term investment mix employed under this Investment Policy Statement.

Risk Profile

Investment theory and historical capital market return data suggest that, over long periods of time, there is a relationship between the level of risk assumed and the level of return that can be expected in an investment program. In general, higher risk (e.g., volatility of return) is associated with a higher return.

Given this relationship between risk and return, a fundamental step in determining the investment policy for the Portfolio is the determination of an appropriate risk profile. There are two primary factors that affect the Investor’s risk profile:

1. Financial ability to accept risk within the investment program, and;
2. Willingness to accept return volatility.

Taking these two factors into account, the Investor utilizes a Robo Advisor™ investment calculator to determine his/her risk profile or has rated his/her own risk profile as **Moderately Conservative**. An investor in the conservative profile will have a higher tolerance for risk than the defensive risk profile and/or a longer time horizon of three to seven years (3-7 years). Accordingly, The Robo Advisor WRAP Fee model which best corresponds to this description is the Moderate-Income Portfolio. The Investor recognizes that higher returns involve some volatility and has indicated a willingness to tolerate declines in the value of this Portfolio of between 0% and 15% in a given year.

Liquidity

The investor has not expressed a need to always maintain a minimum level of cash or cash equivalents in the Investor's Portfolio. However, at least 5% of the Portfolio shall always be maintained in cash or cash equivalents for emergencies or opportunities.

Diversification

Investment of the Investor's funds shall be diversified across a range of individual marketable securities or packaged products (for example, mutual funds, separately managed accounts, or unit investment trusts) to reduce risk and enhance returns. The specific categories of permitted and prohibited investments for each portfolio are outlined in separate sections to provide a clear understanding of the investment options and restrictions. Please refer to the 'Permitted Asset Classes and Security Types' section for a detailed list of allowable investments for this portfolio, and the 'Prohibited Asset Classes and Security Types' section for a list of investments that are not allowed for this portfolio.

Balanced Income Portfolio Investment Philosophy

The Balanced Income Portfolio is an actively managed and fluid ensemble of various securities blended within a tactically dynamic investment philosophy. This investment philosophy includes sophisticated research, quantitative and qualitative analysis, esoteric securities selection, built-in cost constraints, proprietary allocation methods as well as the strategic rotating, overweighting, and underweighting of select sectors and styles. This level of effort and activity is built around providing the greatest possibility of achieving benchmark performance standards in both up and down markets.

The investment manager and/or Advisor have full discretion to decide on portfolio investments. The investment manager(s) and/or Advisor will review portfolio holdings, economic indicators, and other relevant information on a quarterly basis to assess the attainment of benchmark performance standards. The advisor may inform the Investor of scheduled changes

recommended for the upcoming quarter either by telephone, mail, or some form of electronic communication. However, the Investor understands that certain events may occur intra-quarter which may require Investment Manager(s) and/or Advisor to institute unscheduled changes in allocation or diversification in an attempt to de-risk the portfolio to preserve asset value or to capitalize on unique investment opportunities.

Investment and Allocation Objectives

The main objective of this portfolio is to produce steady, conservative income and capital preservation without regard for keeping pace with inflation while meeting a stated benchmark performance principle. The benchmark performance principle shall be to attempt to attain an average annual rate of return (over a period of at least 5 years) equal to the performance benchmark described below. Portfolios in this range should know that minor and infrequent fluctuations in the value of this portfolio can occur; it would not be considered rare for this to happen. The equity allocation range of the portfolio will vary between zero to fifteen percent.

Performance Benchmark

The “smart” Balance Income benchmark is dynamically adjusted to the comparative index weightings of the underlying securities within the respective portfolio allocation.

Time Horizon

For the purposes of planning, the time horizon for these investments is to be two to five years (2-5). Capital values do fluctuate over shorter periods, and the Investor should recognize that the possibility of capital loss does exist. However, historical asset class return data suggests that the risk of principal loss over short-term holding periods can be minimized with the long-term investment mix employed under this Investment Policy Statement.

Risk Profile

Investment theory and historical capital market return data suggest that, over long periods of time, there is a relationship between the level of risk assumed and the level of return that can be expected in an investment program. In general, higher risk (e.g., volatility of return) is associated with a higher return.

Given this relationship between risk and return, a fundamental step in determining the investment policy for the Portfolio is the determination of an appropriate risk profile. There are two primary factors that affect the Investor’s risk profile:

1. Financial ability to accept risk within the investment program, and;
2. Willingness to accept return volatility.

Taking these two factors into account, the Investor utilizes a Robo Advisor™ investment calculator to determine his/her risk profile or has rated his/her own risk profile as

Conservative. An investor in the defensive profile will have the lowest tolerance for risk and/or a short-term time horizon of two to five (2-5 years). Accordingly, The Robo Advisor WRAP Fee model which best corresponds to this description is the Balanced Income Portfolio. The Investor recognizes that higher returns involve some volatility and has indicated a willingness to tolerate declines in the value of this Portfolio of between 0% and 10% in a given year.

Liquidity

The investor has not expressed a need to always maintain a minimum level of cash or cash equivalents in the Investor's Portfolio. However, at least 5% of the Portfolio shall be maintained in cash or cash equivalents at all times for emergencies or opportunities.

Diversification

Investment of the Investor's funds shall be diversified across a range of individual marketable securities or packaged products (for example, mutual funds, separately managed accounts, or unit investment trusts) to reduce risk and enhance returns. The specific categories of permitted and prohibited investments for each portfolio are outlined in separate sections to provide a clear understanding of the investment options and restrictions. Please refer to the 'Permitted Asset Classes and Security Types' section for a detailed list of allowable investments for this portfolio, and the 'Prohibited Asset Classes and Security Types' section for a list of investments that are not allowed for this portfolio.

Information Applicable to All Robo Advisor Wrap Fee Portfolio Investment Models

Risk Profiling

At Robo Advisor™, we understand the importance of providing our customers with personalized investment solutions that meet their unique financial goals and risk tolerance. That's why we offer a risk profiling tool that helps our customers determine their risk profile and identify investment strategies that align with their financial objectives.

Our risk profiling tool consists of a series of questions that are designed to uncover important information about our customers' investment goals, experience, and risk tolerance. We use this information to generate a personalized risk profile for each customer, which serves as a starting point for building a customized investment strategy that is tailored to their unique needs.

The questions asked in our risk profiling tool can vary depending on a variety of factors, but they generally cover topics such as:

1. Investment goals: What are the investor's financial goals, such as retirement or saving for a specific goal?
2. Investment time horizon: What is the investor's time horizon for the investment, such as short-term or long-term?
3. Risk tolerance: How comfortable is the investor with the possibility of losing money on their investment?
4. Investment experience: How experienced is the investor with investing, and what types of investments have they made in the past?
5. Liquidity needs: Does the investor need access to their money in the short-term, or can they invest for the long-term?

We believe that investing should be accessible to everyone, regardless of their level of experience or financial means. That's why we offer a range of investment portfolios, each designed to meet the needs of investors with different investment objectives and risk profiles. Whether you're looking for aggressive growth, income, or a balanced approach, we have an investment philosophy that is right for you.

We're committed to providing our customers with the information and tools they need to make informed investment decisions. If you have any questions or concerns about our risk profiling tool or our investment portfolios, please don't hesitate to reach out to our team. We're here to help you achieve your financial goals and build a brighter future.

Investment Platform

The recommended platform would be an investment management WRAP account where there are no transaction fees, sales charges, or commissions (limitations may apply). This is true for all holdings including retail mutual funds which normally assess a sales charge/load. Since one of the keys to successful investing is the ability to independently evaluate each investment opportunity, the presence of a commission may hinder the decision-making process. These concerns are eliminated with fee-based accounts because no commissions are charged on individual transactions. The client, depending upon the Account Level selected may pay a monthly subscription fee and/or an annual asset-based fee, assessed quarterly, based on the size of the account. Because of this, we believe the Investment Manager and Advisor have a greater personal stake in the success of each account.

Investment Selection, Manager, and Control Procedures

Investment managers (including mutual funds, money managers, and limited partnership sponsors) shall be chosen using the following criteria:

- a. Past performance is considered relative to other investments having the same investment objective. Consideration shall be given to both performance rankings over various time frames and consistency of performance.

- b. Investment philosophy employed by the managers and overall success of managers relative to the peer group.
- c. Acquisition costs and/or expense ratios relative to other funds with like objectives and investment styles.
- d. Size of the proposed mutual fund, turnover rate, and average market cap.
- e. Length of time the fund has been in existence and length of time it has been under the direction of the current manager(s) and whether there have been material changes in the manager's organization and personnel.
- f. For Bond Funds, average credit quality and duration.
- g. The historical volatility and downside risk of each proposed investment.
- h. How well each proposed investment complements other assets in the Portfolio.
- i. The current economic environment.
- j. The likelihood of future investment success, relative to other opportunities.

Permitted Asset Classes and Security Types

In order to maintain a well-diversified and risk-managed investment portfolio, our Robo Advisor Wrap Fee Program adheres to specific guidelines regarding the types of asset classes and security types that can be included in each portfolio. This section outlines the allowable investments across various asset classes and security types, providing a comprehensive list to help investors understand their investment options.

Permitted Asset Classes

1. Cash and cash equivalents
2. Fixed Income—Domestic Bonds
3. Fixed Income—Non-U.S. Bonds
4. Equities—U.S.
5. Equities—Non-U.S.
6. Equities—Emerging Markets
7. Equities—REITs
8. Equipment Leasing
9. Mortgages
10. Annuities

Permitted Security Types

1. Mutual Funds, ETFs, Stocks, Bonds, Publicly Traded REITs, Money Market Funds.
2. Individual Stocks if they are traded on the New York, American, or NASDAQ Stock Exchanges.
3. Individual Bonds if they are rated “A” or better and traded on a major U.S. exchange.
4. Closed-end funds and Separately Managed Accounts.
5. Deferred & Income Annuities issued by an insurance company with an A.M Best rating for financial strength of “B++” or better.
6. Leveraged Transactions

Prohibited Asset Classes and Security Types

It is equally important to be aware of the investments that are not allowed within our Robo Advisor Wrap Fee Program. This section details the asset classes and security types that are explicitly prohibited, ensuring that investors have a clear understanding of the restrictions in place to maintain a prudent investment strategy.

Prohibited Asset Classes and/or Security Types

7. Venture Capital
8. Purchases of Letter Stock, Private Placements, or direct payments.
9. Puts, calls, straddles, or other option strategies, except as permitted above.
10. Purchases of real estate, except for REITs.

Reporting

1. Advisor shall provide Investor with a report each quarter that lists all assets managed by the advisor and held by Investor, values for each asset, and all transactions affecting assets within the Portfolio, including additions and withdrawals.
2. Investor shall receive no less frequently than on a quarterly basis and within 30 days from the end of each such quarter the following management reports:
 - a. Portfolio performance results over the last quarter, year, three years, and five years
 - b. Performance results of each individual manager for the same periods
 - c. Performance results of comparative benchmarks for the same periods
 - d. Performance reporting on a basis that follows AIMR standards
 - e. End of quarter status regarding asset allocation—current versus policy
 - f. Any recommendations for changes to the above.
3. “Smart” benchmark comparison of portfolio performance. The “smart” benchmark is

dynamically adjusted to the comparative index weightings of the underlying securities within the respective portfolio allocation. While there is no guarantee that the benchmark performance standard will be met, this “smart” benchmark approach is expected to identify a proper performance standard of achievement more closely.

Meetings and Communication between Investors and Advisor

As a matter of course, the Advisor shall keep the Investor apprised of any material changes in the Advisor’s outlook, recommended investment policy, and tactics. In addition, the Advisor shall meet with the Investor as necessary to review and explain the Portfolio’s investment results and any related issues. Advisor meetings shall either be conducted in person, via telephone, webinar, or some other electronic means. The advisor may also be available on a reasonable on-demand basis for telephone communication when needed.

Any material event that affects the ownership of the Advisor firm or the management of the Portfolio must be reported immediately to the Investor.

Rebalancing Procedures

From time to time, market conditions may cause the Portfolio’s investment in various asset classes to vary from the established allocation. To remain consistent with the asset allocation guidelines established by this Investment Policy Statement, quarterly, the Advisor and/or Strategist shall review the Portfolio and each asset class in which the Portfolio is invested. If the actual weighting differs from the target weighting by 5% or more from the recommended weighting, unless due to a strategist recommendation the Advisor shall rebalance the Portfolio back to the recommended weighting.

Duties and Responsibilities

The Advisor

The advisor is expected to manage the Portfolio in a manner consistent with this Portfolio strategy, with the Investment Policy Statement between Advisor and client, and in accordance with State and Federal law and the Uniform Prudent Investor Act. The advisor is a Registered Investment Advisor and shall act as the investment advisor and fiduciary to the Investor until the Investor decides otherwise. Fiduciary responsibility exceeds that which is normally required of ordinary business relationships – the Advisor must place the interest of their clients above those of their own. As such, the Advisor will execute recommended transactions in a fiduciary standard at the Advisor’s discretion and in the Investor’s best interest.

Advisor shall be responsible for:

1. Designing, recommending, and implementing an appropriate asset allocation consistent with the investment objectives, time horizon, risk profile, guidelines, and constraints outlined in this statement.

2. Recommending an appropriate custodian to safeguard Investor's assets.
3. Advising the Investor about the selection of and the allocation of asset categories.
4. Identifying specific assets and investment managers within each asset category.
5. Ensuring that the custodian provides Investor with a current prospectus, where applicable, for each investment proposed for the Portfolio.
6. Monitoring the performance of all selected assets.
7. Recommending changes to any of the above.
8. Periodically reviewing the suitability of the investments for the Investor and being available for discussion at such times within reason at the Investor's request.
9. Preparing and presenting appropriate reports.

Investor shall be responsible for:

1. The oversight of the Portfolio.
2. Defining the investment objectives and policies of the Portfolio.
3. Directing Advisor to make changes in investment policy and to oversee and approve or disapprove Advisor recommendations regarding policy, guidelines, objectives, and specific investments on a timely basis.
4. Investor shall provide Advisor with all relevant information on Investor financial conditions and risk tolerances and shall notify Advisor promptly of any changes to this information.
5. Investor will inform Advisor promptly of changes in address and any extended absence particularly in the two weeks prior to and directly after fiscal quarter breaks.
6. Investor shall read and understand the information contained in the prospectuses of mutual funds used and each investment in the Portfolio.
7. The investor is responsible for exercising all securities rights, including voting rights, as are acquired through the purchase of securities. Investor shall vote all proxies and Investor recognizes that Advisor will not vote proxies nor advise Investor on the voting of proxies.

Investment Advisory Fees

Pursuant to an Investment Advisory contract signed by each client, the client will pay Robo Advisor an Investment Advisory fee, payable quarterly in advance, based upon the assets in the

account at the beginning of the period, and for new accounts, prorated from inception to the end of the period.

The all-inclusive Investment Advisory fees range from 0% per annum to 0.25% per annum but may be negotiated at the discretion of the Advisor for factors such as the overall size and nature of the client relationship or the complexity of the strategy employed. The Investment Advisory fees may be reduced or waived for directors, officers, and employees of Robo Advisor at the discretion of management. Investment Advisory fees will be automatically deducted from the client account on a quarterly basis by the Custodian as agreed in the contract.

At no time will Robo Advisor accept or maintain custody of a client's funds or securities except for authorized fee deduction. The Investment Advisory fee will include all custody, transaction, and sub-advisory costs, which will be paid by the Advisor. To the extent used in Portfolio construction, the client will, however, pay certain ongoing costs of investing in packaged products, such as the total expense ratio of mutual funds. The specific arrangement for each client will be negotiated and defined in the investment advisory contract signed by each client.

Generally, clients in wrap fee accounts, with the transaction and custody costs included, will pay a higher Advisory Fee than those where those costs are not included in the fee. Clients that opt for the inclusive fee will not pay any transaction fees or costs beyond the inclusive Advisory Fee. The inclusive fee may cost the client more or less than purchasing such services separately depending on the number of transactions that occur in the account.

All fees paid to Robo Advisor for investment advisory services are separate and distinct from the expenses charged by mutual funds to their shareholders and the product sponsor in the case of variable insurance products. These fees and expenses are described in each fund or variable product's prospectus. These fees will generally include a management fee and other fund expenses.

A client could invest in these products directly, without the services of Robo Advisor. In that case, the client would not receive the services provided by Robo Advisor which are designed, among other things, to assist the client in determining which products or services are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the product sponsor and the fees charged by Robo Advisor to fully understand the total fees to be paid.

Investment advisor representatives of Robo Advisor are not compensated differently for clients that choose the wrap fee arrangement versus a non-inclusive fee and therefore they do not have a financial incentive to recommend one method over the other.

Termination and Cancellation. As noted, the quarterly management fee is payable in advance. Neither the Client nor the Advisor may assign, convey, or otherwise transfer any of their rights, obligations, or interests under this Agreement without the prior written consent of the other party. This Agreement may be terminated in whole or in part, at any time, by either party, by

written notice to the other party.

- a. When advisor initiated, such termination shall be effective the earlier of thirty (30) days after receipt of such notice in writing or when the account is liquidated and transferred.
- b. When client-initiated, such termination shall be effective the later of:
 - i. thirty (30) days after receipt of such notice in writing, all transactions to liquidate the account within thirty (30) days shall be treated as one and/or
 - ii. When the account or a remaining balance in the account is liquidated and transferred after thirty (30) days, all transactions to liquidate the account shall be treated separately as of their respective date.
- c. If no notice is provided, then all transactions to liquidate the account shall be treated separately as of their respective date plus thirty (30) days.
- d. **There is no refund of monthly subscription fees.**

Item 5. Account Requirements and Types of Clients

Robo Advisor offers its services to a diverse range of clients, including individuals, trusts, estates, charitable organizations, corporations, and other business entities. There are no minimum requirements for opening or maintaining an account with our firm.

Item 6. Portfolio Manager Selection and Evaluation

When a client joins Robo Advisor, they are assigned an Investment Advisory Representative (IAR). The IAR is responsible for managing the client's investment accounts, which may involve managing the portfolios themselves or selecting unaffiliated portfolio managers. The selection of unaffiliated managers is based on various factors, such as investment strategy, risk profile, methodology, past performance, operational capabilities, compliance, regulatory record, transparency, and ease of doing business.

Robo Advisor's IARs continuously monitor client accounts to ensure the unaffiliated managers meet the client's needs, goals, and objectives. If the manager no longer aligns with the client's needs, the IAR will recommend changes.

It is important to note that investing in securities involves the risk of loss, which clients must be prepared to bear.

Robo Advisor also provides Financial Planning Services, offering portfolio customization and tailored investment advice based on clients' objectives, goals, and financial situations. Our Investment Advisor Representatives provide general non-securities advice on topics such as tax planning, estate planning, business planning, retirement planning, education planning, budgeting, and cash flow. Fees for these services are billed at rates up to \$150 per hour and are negotiable.

Advisory services are tailored to clients' individual needs, taking into account any restrictions they may have on investing in certain securities or types of securities. Robo Advisor does not vote on proxies for securities held in client accounts, nor does it advise clients on how to vote. Clients retain full authority and responsibility for voting on proxies.

Item 7. Client Information Provided to Portfolio Managers

Robo Advisor adheres to a strict Privacy Policy and does not share non-public financial information with unaffiliated entities. When using an unaffiliated portfolio manager, only the necessary information required for the manager to perform their contracted services is provided, and they must adhere to a privacy policy as comprehensive as Robo Advisor's Privacy Policy.

Item 8. Client Contact with Portfolio Managers

There are no restrictions placed on clients' ability to contact and consult with their IARs. Robo Advisor encourages clients to communicate with their IARs whenever there are changes in their circumstances that may affect their investor profile.

Item 9. Additional Information

Robo Advisor is committed to maintaining a high standard of ethical conduct and transparency in its business practices. As such, we wish to disclose any legal or disciplinary events that may be relevant to clients in their evaluation of our advisory services.

To date, Robo Advisor has not experienced any legal or disciplinary events, either currently or in the past.

However, it is important to note that the firm's CEO, Jeffrey J. Hovermale, faced a temporary suspension by the Financial Industry Regulatory Authority (FINRA) on December 31, 2018, due to a "failure to respond" violation. Mr. Hovermale was subsequently reinstated on March 27, 2019, with no sanctions imposed. This isolated incident has been resolved, and we continue to uphold the highest levels of integrity and professionalism in our operations.

Neither Robo Advisor nor any of its management persons are registered or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor.

Conflicts of Interest: Insurance Products and Services

The Investment Advisor Representatives (IARs) of Robo Advisor may also be licensed and registered as insurance agents, either individually or through Sovereign Wealth Management

Group, Inc., entities registered as insurance agencies in various states. As a result, IARs may sell annuities, life, accident, and other lines of insurance for various insurance companies. They will be able to purchase annuity and insurance products for clients in need of such services and will receive separate, yet typical compensation in the form of commissions for the purchase of these insurance products.

This situation creates a conflict of interest, as the receipt of additional compensation by the Investment Advisor Representatives may influence their recommendations. It is important for clients to be aware of this potential conflict when considering the purchase of insurance products through Robo Advisor or its IARs.

Please note that clients are not obligated to use Robo Advisor or its Investment Advisor Representatives for insurance product services. In cases where clients choose to purchase insurance products through Robo Advisor or its IARs, no advisory fee will be associated with these products. By disclosing this information, we aim to maintain transparency and address any potential concerns related to conflicts of interest in our investment advisory services.

Robo Advisor recommends and selects other investment advisors for clients as described above in Item 4.