



# RoboAdvisor™

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## Robo Advisor, Inc.

### Form CRS Customer Relationship Summary

#### ABOUT ROBO ADVISOR™

Robo Advisor, Inc. is an investment adviser registered with the Securities and Exchange Commission. Our investment advisory services and fees differ from those of a broker-dealer, and it is important for you to understand those differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://www.investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing. We have provided **Conversation Starters** in each section to highlight important information about our business and anticipate questions you may have. Our Service Team or your advisor is also available to answer your questions.

#### INVESTMENT SERVICES

##### WHAT INVESTMENT SERVICES AND ADVICE CAN YOU PROVIDE ME?

Our services include investment advisory services, portfolio management, rebalancing, tax optimization (if applicable), and personal financial planning. We offer our advisory services as part of an "all-inclusive" **WRAP Fee program**. Since we manage your assets on a discretionary basis, our decisions to buy and sell securities in your accounts do not require your express approval.

##### Conversation Starter:

GIVEN MY FINANCIAL SITUATION, SHOULD I CHOOSE AN INVESTMENT ADVISORY SERVICE? WHY OR WHY NOT?

##### HOW WILL YOU CHOOSE INVESTMENTS TO RECOMMEND TO ME?

Currently, we only offer investment advisory accounts and invest your assets in one of our core portfolios. Our portfolios invest primarily in Exchange Traded Funds (ETFs), Mutual Funds, and individual equities. Construction of these portfolios begins with an asset universe that is filtered, ordered, and then ranked using our independent ranking methodology. We then work with you to understand your investment objectives, risk profile, along with any specific investment goals you may have. We then position you in a diversified and suitable investment strategy. We can also work with you on flexible strategies specific to regions or global; also, as themes such as sharia, sustainability, and socially responsible investing. As of the date of this document, there are no minimum size requirements for opening or maintaining an account with our firm.

##### Conversation Starter:

WHAT IS YOUR RELEVANT EXPERIENCE, INCLUDING YOUR LICENSES, EDUCATION, AND OTHER QUALIFICATIONS? WHAT DO THESE QUALIFICATIONS MEAN?

##### HOW OFTEN WILL YOU MONITOR MY ACCOUNT'S INVESTMENTS, PERFORMANCE AND OFFER ADVICE?

The strategy's purpose is dynamically managed to meet your goals over time. Daily monitoring of your investments is performed by our Artificial Intelligence (AI). The "machine" processes new data daily, which drives a continuous improvement cycle. It looks for short-term trends, based on what is going on in the current market to adjust and react rapidly to. It then suggests trades or a periodic rebalancing of your account(s), which is performed by our trading team with oversight from our Chief Investment Officer. Manual overrides are built into all monitoring and trading systems as a failsafe. Depending on the service level you choose when opening your account, an advisor may be available to review your accounts periodically. Of course, you are always welcome to call us at 407.474.5600 to discuss your accounts.

##### Conversation Starter:

HELP ME UNDERSTAND HOW THESE FEES AND COSTS MIGHT AFFECT MY INVESTMENTS. IF I GIVE YOU \$10,000 TO INVEST, HOW MUCH WILL GO TO FEES AND COSTS, AND HOW MUCH WILL BE INVESTED FOR ME?

#### FEES, COSTS, CONFLICTS, AND LEGAL OBLIGATIONS

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. For additional information, including fees and services, see our disclosure statement as set forth on [Form ADV Part 2A](#) (specifically items 4 and 5 therein).

#### WHAT FEES WILL I PAY AND WHAT SERVICES SHOULD I EXPECT FOR THE FEES THAT I AM PAYING?

Depending on the Service Level that you select, we will generally receive an “all-inclusive” annual management fee (billed monthly). There are two ways this fee may be assessed. As shown in the table below, if account assets are below the Service Level Threshold Amount (**SLTA**), the fees are a flat amount. If assets are above the **SLTA**, fees range from 0.0% to 0.25% of assets annualized. Because our advisory services are offered as part of a **WRAP Fee program**, your fee covers most transaction and custody costs, and commissions we pay to broker-dealers for trades in your account.

#### WRAP Fee Program table of expenses:

SERVICE LEVEL	ACCOUNT DESCRIPTION	SLTA	FEE IF BELOW SLTA	FEE IF ABOVE SLTA
Automatic	Our AI creates and manages your portfolio.	\$1,000	\$0.00 mo.	0.00% = \$0 yr. minimum
Custom	Our AI creates and manages your portfolio (you may make some individual customizations).	\$25,000	\$2.99 mo.	0.15% = \$37.50 yr. minimum
Advisor	An advisor may work with you to custom-build and manage your portfolio.	\$40,000	\$8.99 mo.	0.25% = \$100 yr. minimum

Asset-based fees associated with the WRAP Fee program will include most transaction costs and fees to a broker-dealer or bank that has custody of these assets, and therefore are higher than a typical asset-based advisory fee. For additional information, including fees and services, see our disclosure statement as set forth on [Form ADV Part 2A](#). (specifically, items 4 and 5 therein).

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#### Conversation Starter:

HOW MIGHT YOUR CONFLICTS OF INTEREST AFFECT ME, AND HOW WILL YOU ADDRESS THEM?

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#### WHAT ARE YOUR LEGAL OBLIGATIONS TO ME WHEN ACTING AS MY INVESTMENT ADVISOR? HOW ELSE DOES YOUR FIRM MAKE MONEY AND WHAT CONFLICTS OF INTEREST DO YOU HAVE?

When we act as your investment adviser, we must act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they affect the recommendations, we provide you. Our advisors earn a portion of the fees collected for the management of your account. Here are some examples to help you understand what this means. Representatives of Robo Advisor may also be licensed and registered as insurance agents to sell an annuity, life, accident, and other lines of insurance for various insurance companies. Therefore, they will be able to purchase insurance products and will receive separate, yet typical compensation in the form of first-year or trail commissions for the purchase of insurance products. However, in such instances, there is no advisory fee associated with these insurance products.

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#### Conversation Starter:

AS A FINANCIAL PROFESSIONAL, DO YOU HAVE ANY DISCIPLINARY HISTORY? FOR WHAT TYPE OF CONDUCT?

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#### DISCIPLINARY HISTORY

##### DO YOU OR YOUR FINANCIAL PROFESSIONALS HAVE LEGAL OR DISCIPLINARY HISTORY?

Yes. Certain advisors are required to disclose disciplinary information on their Form U4. You may visit [Investor.gov/CRS](#) for a free and simple search tool to research us and our financial professionals.

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#### Conversation Starter:

WHO IS MY PRIMARY CONTACT PERSON? IS HE OR SHE A REPRESENTATIVE OF AN INVESTMENT ADVISER OR BROKER-DEALER? WHO CAN I TALK TO IF I HAVE CONCERNS ABOUT HOW THIS PERSON IS TREATING ME?

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#### ADDITIONAL INFORMATION

If you would like additional, up-to-date information or a copy of this disclosure, [download here](#) or please call us at 407.474.5600.

##### IF I HAVE CONCERNS ABOUT HOW MY ADVISOR IS TREATING ME, WHO CAN I TALK TO?

If you have problems with your investments, account, or advisor, call or contact us in writing immediately at [compliance@roboadvisor.com](mailto:compliance@roboadvisor.com).

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Robo Advisor™ is the marketing name for Robo Advisor Technologies™, Robo Advisor, Inc. and Sovereign Wealth Management Group, Inc. | Fee-Based Investment Advisory offered through Robo Advisor, Inc., an SEC registered investment advisor. SEC registration does not imply a certain level of skill or training. | Insurance & Annuities are distributed through Sovereign Wealth Management Group, Inc., a licensed insurance agency.