Item 1: Cover Sheet

FORM ADV PART 2A

INFORMATIONAL BROCHURE

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March 6, 2021

This brochure provides information about the qualifications and business practices of Robbins Farley LLC if you have any questions about the contents of this brochure, please contact us at 603-703-0255. 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. Our registration does not imply a certain level of skill or training.

Additional information about Robbins Farley LLC (CRD# 286581) is also available on the SEC's website at www.adviserinfo.sec.gov.

Item 2: Statement of Material Changes

Robbins Farley LLC ("Robbins Farley", "we", or "the Firm") is required to report any material changes to the ADV Part 2A here in Item 2. There are no material changes to report.

Item 3: Table of Contents

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Item 4: Advisory Business

Robbins Farley has been in business as an independently registered investment adviser since March, 2017. However, the Firm's principals have been in business operating under Robbins Farley since 2012. Colleen Farley and Robert Robbins are the Firm's principals.

Robbins Farley provides wealth planning and management services as well as corporate services. Robbins Farley does not limit the types of clients with whom it works, but most clients are individuals, their affiliated trusts, charitable organizations and businesses.

Wealth Planning and Accumulation

Financial Planning

Robbins Farley's focus is on assisting clients as they prepare for and ultimately experience the major transitions in their lives. For many clients, the only life transition that merits preparation is retirement. However, Robbins Farley believes that not only are there other major transitions, but preparing for those as well can assist clients in their planning for retirement. Examples of transitions include marriage, divorce, death of a spouse, receipt of an inheritance, career changes, sale of a business.

The first step in working with Robbins Farley is to gather information about the client, their goals and their current circumstances. Robbins Farley will request clients to provide documents regarding their income, tax status, savings, and investments, among other requests. Clients will engage with Robbins Farley in conversations where the client learns about Robbins Farley's thought process and methods, and Robbins Farley gathers information needed to develop a proposed plan for moving forward. After this initial meeting, the Firm will review, research, and prepare a proposal for the client. This proposal is presented at a separate meeting, where the client reviews the proposal and considers whether to engage the Firm to continue its work. Ultimately this proposal forms the map from which both the client and Robbins Farley take direction throughout the engagement.

Asset Management

When we perform asset management services, we prefer to do so on a discretionary basis. This means that while we will continue an ongoing relationship with each client, being involved in various stages of their lives and decisions to be made, we will not seek specific approval of changes to the securities in client accounts. Clients can always make deposits or withdrawals in their accounts at any time. Because we take discretion when managing accounts, clients engaging us will be asked to execute a Limited Power of Attorney (granting us the discretionary authority over the client accounts) as well as an agreement that outlines the responsibilities of both the client and Robbins Farley. Advisory services are tailored to the specific needs of an individual client. Clients may place reasonable restrictions on the management of assets, including specific securities or types of securities. However, clients should understand that significant restrictions cannot only decrease the ability of Robbins Farley to meet the client's goals, but also increase the costs associated with managing the client's portfolio.

In very limited cases, Robbins Farley provides investment management services on a non-discretionary basis, which means we will consult with the client prior to implementing any investment recommendation. Clients should be aware that some recommendations may be time-sensitive, and, as such, their performance may or may not be affected if Robbins Farley is unable to reach them on a timely basis.

Each client's portfolio will be invested according to that client's investment objectives. Robbins Farley determines these objectives with the client through reviewing client provided documents, client interviews and/or asking the client to put these objectives in writing. Once we ascertain your objectives for each account, we will develop a portfolio we believe will best fit your needs. This means allocating assets to one or more of our investment programs. The investment programs are not investment products. Clients may have different needs than others within the same investment program. Accordingly, not all clients in each investment program will have the exact same percentages of each underlying investment.

The investment portfolios that we recommend are based on the needs of the client as compared with the typical behavior of that security type or manager, current market conditions, the client's current financial situation (including assets that may be managed by another advisor), financial goals, and the timeline to meet those goals. Because we develop an investment strategy based on your personal situation and financial goals, your asset allocation guidelines may be similar to or different from another client.

Asset Management – Institutional Intelligent Portfolios™ Program

For some accounts, we provide portfolio management services through an investment service called Institutional Intelligent Portfolios™, an automated, online investment management platform for use by independent investment advisors offered by software provider Schwab Performance Technologies (the "Program" and "SPT," respectively). Through the Program, we offer clients a range of investment strategies we have constructed and manage. The client's portfolio is held in a brokerage account opened by the client at SPT's affiliate, Charles Schwab & Co., Inc. ("CS&Co"). We are independent of and not owned by, affiliated with, or sponsored or supervised by SPT, CS&Co or their affiliates (together, "Schwab").

We, and not Schwab, are the client's investment advisor and primary point of contact with respect to the Program. We are solely responsible, and Schwab is not responsible, for determining the appropriateness of the Program for the client, choosing a suitable investment strategy and portfolio for the client's investment needs and goals, and managing that portfolio on an ongoing basis.

We have contracted with SPT to provide us with the technology platform and related trading and account management services for the Program. This platform enables us to make the Program available to clients online and includes a system that automates certain key parts of our investment process (the "System"). The System includes an online questionnaire that helps us determine the client's investment objectives and risk tolerance and select an appropriate investment strategy and portfolio. Clients should note that we will recommend a portfolio via the System in response to the client's answers to the online questionnaire. The client may then indicate an interest in a portfolio that is one level less or more conservative or aggressive than the recommended portfolio, but we then make the final decision and select a portfolio based on all the information we have about the client. The System also includes an automated investment engine through which we manage the client's portfolio on an ongoing basis through automatic rebalancing and tax-loss harvesting (if the client is eligible and elects).

We do not receive a portion of a wrap fee for our services to clients through the Program. Clients do not pay fees to SPT in connection with the Program, but we charge clients a fee for our services as described below under Item 5. Our fees are not set or supervised by Schwab. Clients do not pay brokerage commissions or any other fees to CS&Co as part of the Program. Schwab does receive other revenues in connection with the Program, which are described in the "Compensation to Schwab Under the Program" section below.

We do not pay SPT fees for the Platform so long as we maintain $100 million in client assets in accounts at CS&Co that are not enrolled in the Program. If we do not meet this condition, then we pay SPT an annual licensing fee of 0.10% (10 basis points) on the value of our clients' assets in the Program. This arrangement presents a <u>conflict of interest</u>, as it provides an incentive for Robbins Farley to recommend that clients maintain their accounts at CS&Co. Notwithstanding, Robbins Farley may generally recommend to its clients that they maintain investment management accounts at CS&Co. based on the considerations discussed in Item 12 below, which mitigates but does not eliminate this conflict of interest.

Clients enrolled in the Program are limited in the universe of investment options available to them. For example, the investment options available are generally limited to ETFs, whereas Robbins Farley recommends various other types of securities in its other services. The Program is designed to provide guidance and professional assistance to individuals who are beginning the process of accumulating wealth. Clients will have access to their accounts and a financial interface online but will also have the opportunity to confer with Robbins Farley with respect to their account.

Rebalancing
The System will rebalance a client's account periodically by generating instructions to CS&Co. to buy and sell shares of funds and depositing or withdrawing funds through the "Sweep Program", considering the asset allocation for the client's investment strategy. Rebalancing trade instructions can be generated by the System when (i) the percentage allocation of an asset class varies by a set parameter established by Robbins Farley, (ii) Robbins Farley decides to change asset allocation percentages for an investment strategy or (iii) Robbins Farley decides to change a client's investment strategy, which could occur, for example, when a client makes changes to their investment profile or imposes or modifies restrictions on the management of their account.

Sweep Program
Each investment strategy involves a cash allocation ("Cash Allocation") that will be held in a sweep program at Charles Schwab Bank (the "Sweep Program"). The Cash Allocation will be a minimum of 4% of an account's value to be held in cash, and may be higher, depending on the investment strategy chosen for a client. The Cash Allocation will be accomplished through enrollment in the Sweep Program, a program sponsored by CS&Co. By enrolling in the Program, clients consent to having the free credit balances in their brokerage accounts at CS&Co. swept into deposit accounts ("Deposit Accounts") at Charles Schwab Bank ("Schwab Bank") through the Sweep Program. Schwab Bank is an FDIC-insured depository institution that is a Schwab affiliate. The Sweep Program is a required feature of the Program. If the Deposit Account balances exceed the Cash Allocation for a client's investment strategy, the excess over the rebalancing parameter will be used to purchase securities as part of rebalancing. If clients request cash withdrawals from their accounts, this likely will require the sale of fund positions in their accounts to bring their Cash Allocation in line with the target allocation for their chosen investment strategy. If those clients have taxable accounts, those sales may generate capital gains (or losses) for tax purposes. In accordance with an agreement with CS&Co., Schwab Bank has agreed to pay an interest rate to depositors participating in the Sweep Program that will be determined by reference to an index.

Compensation to Schwab Under the Program
Clients do not pay fees to SPT or brokerage commissions or other fees to CS&Co. as part of the Program. Schwab does receive other revenues, including (i) the profit earned by Charles Schwab Bank, a Schwab affiliate, on the allocation to the Schwab Intelligent Portfolios Sweep Program described in the Schwab Intelligent Portfolios Sweep Program Disclosure Statement; (ii) investment advisory and/or administrative service fees (or unitary fees) received by Charles Schwab Investment Management, Inc., a Schwab affiliate, from Schwab ETFs™ Schwab Funds® and Laudus Funds® that Robbins Farley selects to buy and hold in the client's brokerage account; (iii) fees received by Schwab from third-party ETFs that participate in the Schwab ETF OneSource™ program and mutual funds in the Schwab Mutual Fund Marketplace® (including certain Schwab Funds and Laudus Funds) in the client's brokerage account for services Schwab provides; and (iv) remuneration Schwab may receive from the market centers where it routes ETF trade orders for execution.

Important Disclosures

Limitations of Financial Planning Services

As indicated above, to the extent requested by a client, Robbins Farley may provide financial planning and related consulting services. Neither Robbins Farley nor its investment adviser representatives assist clients with the implementation of any financial plan, unless they have agreed to do so in writing. Robbins Farley does not continuously monitor a client's financial plan unless engaged to do so, and it is the client's responsibility to revisit the financial plan with the Registrant, if desired.

Furthermore, although Robbins Farley may provide recommendations regarding non-investment related matters, such as estate planning, tax planning and insurance, Robbins Farley does not serve as a law firm or accounting firm, and no portion of Registrant's services should be construed as legal or accounting services. Accordingly, Robbins Farley does not prepare estate planning documents or tax returns.

To the extent requested by a client, we may recommend the services of other professionals for non-investment implementation purpose (i.e. attorneys, accountants, insurance, etc.), including Robbins Farley's affiliate, Robbins Farley Insurance, LLC ("RFI"), in its separate capacity as a licensed insurance agency-see Item 10 below.

The client is under no obligation to engage the services of any such recommended professional. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation from Robbins Farley and/or its representatives.

If the client engages any recommended unaffiliated professional, and a dispute arises thereafter relative to such engagement, the client agrees to seek recourse exclusively from and against the engaged professional. At all times, the engaged unaffiliated licensed professional (i.e. attorney, accountant, insurance agent, etc.), and not Robbins Farley, shall be responsible for the quality and competency of the services provided.

Conflict of Interest: The recommendation by a Robbins Farley representative that a client purchase an insurance product from RFI presents a conflict of interest, as the receipt of an insurance commission by RFI may provide an incentive to recommend insurance products based on commissions to be received, rather than on a particular client's need. No client is under any obligation to purchase any securities or insurance commission products from RFI. Clients can purchase insurance products recommended by a Robbins Farley representative through other, non-affiliated insurance agencies.
Retirement Rollovers - Potential for Conflict of Interest

A client or prospective client leaving an employer typically has four options regarding an existing retirement plan (and may engage in a combination of these options): (i) leave the money in the former employer's plan, if permitted, (ii) roll over the assets to the new employer's plan, if one is available and rollovers are permitted, (iii) roll over to an Individual Retirement Account ("IRA"), or (iv) cash out the account value (which could, depending upon the client's age, result in adverse tax consequences). If Robbins Farley recommends that a client roll over their retirement plan assets into an account to be managed by Robbins Farley, such a recommendation creates a conflict of interest if Robbins Farley will earn new (or increase its current) compensation as a result of the rollover. When acting in such capacity, Robbins Farley serves as a fiduciary under the Employee Retirement Income Security Act (ERISA), or the Internal Revenue Code, or both. No client is under any obligation to roll over retirement plan assets to an account managed by Robbins Farley.

Account Aggregation

Robbins Farley may provide periodic aggregated reporting services, which can incorporate all of the client's investment assets including those investment assets that are not part of the assets managed by Robbins Farley (the "Excluded Assets"). Our service relative to the Excluded Assets is limited to reporting services only, which does not include investment implementation.

Because we do not have trading authority for the Excluded Assets, to the extent applicable to the nature of the Excluded Assets (assets over which the client maintains trading authority vs. trading authority designated to another investment professional), the client (and/or the other investment professional) shall be exclusively responsible for directly implementing any recommendations relative to the Excluded Assets. <u>The client and/or their other advisors that maintain trading authority, and not Robbins Farley, shall be exclusively responsible for the investment performance of the Excluded Assets</u>.

Without limiting the above, Robbins Farley shall not be responsible for any implementation error (timing, trading, etc.) relative to the Excluded Assets. In the event the client desires that Robbins Farley provide investment management services (whereby we would have trading authority) with respect to the Excluded Assets, the client may engage us to do so pursuant to the terms and conditions of an advisory agreement.

Portfolio Activity

Robbins Farley has a fiduciary duty to provide services consistent with the client's best interest. As part of its investment advisory services, Robbins Farley will review client portfolios on an ongoing basis to determine if any changes are necessary based upon various factors, including, but not limited to, investment performance, market conditions, fund manager tenure, style drift, account additions or withdrawals, and/or a change in the client's investment objective. Based upon these factors, there may be extended periods of time when Robbins Farley determines that changes to a client's portfolio are neither necessary nor prudent. Robbins Farley's advisory fee referenced at Item 5 below remains payable during periods of account inactivity. Clients nonetheless remain subject to the fees described in Item 5 below during periods of account inactivity.

Use of Mutual and Exchange Traded Funds

Robbins Farley may purchase mutual funds or exchange traded funds for a client's account. Mutual funds and exchange traded funds impose fees at the fund level (e.g. management fees and other fund expenses) that are in addition to Robbins Farley's investment advisory fee, and, to the extent applicable, the transaction fee charged by your custodian.

Trustee Directed Plans

Robbins Farley can be engaged to provide discretionary investment advisory services to ERISA retirement plans, whereby the Firm shall manage Plan assets consistent with the investment objective designated by the Plan trustees. In such engagements, Robbins Farley will serve as an investment fiduciary as that term is defined under The Employee Retirement Income Security Act of 1974 ("ERISA"). Robbins Farley will generally provide services on an "assets under management" fee basis per the terms and conditions of a written agreement between the Plan and the Firm.

Client Obligations

In performing our services, Robbins Farley shall not be required to verify any information received from the client or from the client's other professionals, and is expressly authorized to rely thereon. Moreover, it remains each client's responsibility to promptly notify Robbins Farley if there is ever any change in their financial situation or investment objectives for the purpose of reviewing, evaluating or revising our previous recommendations and/or services.

Assets Under Management

As of December 31, 2020, Robbins Farley has $140,730,430 in assets under management on a discretionary basis across 460 accounts.

Item 5: Fees and Compensation

A. Fees Charged

All investment management clients will be required to execute an Investment Management Agreement that will describe the type of management services to be provided and the fees, among other items. Clients are advised that they may pay fees that are higher or lower than fees they may pay another advisor for the same services, and may in fact pay lower fees for comparable services from other sources. Clients are under no obligation at any time to engage or to continue to engage Robbins Farley for investment services. If you do not receive a copy of this brochure at least 48 hours prior to the execution of an Agreement, you may terminate the agreement within the first five (5) business days without penalty.

Asset Management

Generally, fees vary from 0.00% to 2.00% per annum of the gross market value of a client's assets managed by Robbins Farley. The fee range stated is a guide. Fees are negotiable, and may be higher or lower than this range, based on the nature of the account. Factors affecting fee percentages include the size of the account, complexity of asset structures, and other factors. At no time will the total management fees exceed 3%.

For Example:

Fee Brackets				Annual Rate
-0-	through	$1,000,000	(first $1 Million in Assets)	= 2.00%
$1,000,001	through	$20,000,000	(Value exceeding $1 Million)	= 1.00%

Financial Planning

Clients engaging the Firm for financial planning services may do so on an hourly or fixed fee basis. The hourly rate ranges from $200 to $500 per hour. Fixed fees range from $2,000 to $10,000 per plan. However, these fees are just guidelines, subject to change according to the complexity of the plan and the specific client's circumstances, because some clients have more challenging issues than others. These complexities may not necessarily correlate with greater net worth. In the discretion of Robbins Farley, financial planning fees received may or may not be credited towards a client's asset management fees incurred during the first year of the client engagement.

B. Fee Payment

Asset Management:

For clients whose assets are managed by the firm, investment advisory fees will be debited directly from each client's account. The advisory fee is paid quarterly, in advance, based upon the market value of the assets being managed by Robbins Farley on the last day of the previous billing period as valued by the custodian of your assets. For example, if your annual fee is 1.00%, each quarter we will multiply the value of your account on the last day of the previous billing period by 1.00%, then divide by four (number of quarters). To the extent there is cash in your account, it will be included in the value for the purpose of calculating fees. Once the calculation is made, we will instruct your account custodian to deduct the fee from your account and remit it to Robbins Farley. While almost all of our clients choose to have their fee debited from their account, we will invoice clients upon request.

For the initial quarter, the fee is calculated on a *pro rata* basis, meaning clients will pay a fee based on the number of days left in the quarter in which they engage the Firm. In the event the advisory agreement is terminated, the fee for the final billing period is prorated through the effective date of the termination and the outstanding or unearned portion of the fee is charged or refunded to the client, as appropriate. Any deposits or withdrawals that would result in a fee differential during the quarter of greater than or equal to $50 will be prorated based upon the number of days remaining in the quarter in which the funds are added or withdrawn and the difference shall be added or subtracted from the client's next quarterly fee.

Clients whose fees are directly debited will provide written authorization to debit advisory fees from their accounts held by a qualified custodian chosen by the client. Each quarter, clients will receive a statement from their account custodian showing all transactions in their account, including the fee. Fees are calculated by Robbins Farley and not independently calculated by the custodian. Clients should carefully review their statements, including the fee amounts, and let the Firm know of any questions.

Financial Planning: Financial planning fees will be due upon receipt of invoice from Robbins Farley or may be billed quarterly. In many cases, clients will be asked to put forth a retainer at the onset of the engagement which may be for up to 50% of the expected final cost.

C. Other Fees

There are a number of other fees that can be associated with holding and investing in securities. In addition to the advisory fees paid to Robbins Farley, clients may also incur certain charges imposed by other third parties, such as broker-dealers, custodians, trust companies, banks and other financial institutions. These additional charges may include securities brokerage commissions, transaction fees, custodial fees, margin costs, charges imposed directly by a mutual fund or ETF in a client's account, as disclosed in the fund's prospectus (e.g., fund management fees and other fund expenses), deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. For complete discussion of expenses related to each mutual fund, you should read a copy of the prospectus issued by that fund. Robbins Farley can provide or direct you to a copy of the prospectus for any fund that we recommend to you.

Investment advisory fees charged for ongoing investment management do not always offset financial planning fees paid to Robbins Farley. Whether such fees are offset is in Robbins Farley's discretion and part of our agreement with each client. The receipt of additional fees for financial planning or any other service is a conflict of interest, and clients should be aware of this conflict when considering whether to engage Robbins Farley to implement any investment recommendations. We attempt to mitigate the conflict of interest by requiring employees to acknowledge in the firm's Code of Ethics, their individual fiduciary duty to the clients, which requires that employees put the interests of clients ahead of their own.

As described in Item 4 above, clients do not pay fees to SPT or brokerage commissions or other fees to CS&Co as part of the Program. Schwab does receive other revenues in connection with the Program. Brokerage arrangements are further described in Item 12 below.

Please make sure to read Item 12 of this informational brochure, where we discuss broker-dealer, custodial issues, and brokerage practices.

D. *Pro-rata* Fees

If you become a client during a quarter, you will pay a management fee for the number of days left in that quarter. If you terminate our relationship during a quarter, you will be entitled to a refund of any management fees for the remainder of the quarter. Once your notice of termination is received, we will assess pro-rated fees for the number of days between the end of the prior billing period and the date of termination to be paid in whatever way you direct (check, wire).

E. Compensation for the Sale of Securities.

This item is not applicable.

Item 6: Performance-Based Fees and Side-By-Side Management

Robbins Farley will not charge performance based fees.

Item 7: Types of Clients

Clients advised may include individuals, families, trusts, charitable organizations and foundations, pensions and corporations. Robbins Farley does not typically require any particular minimum amount of assets to be placed with Robbins Farley.

Additionally, the minimum investment required to open an account in the Institutional Intelligent Portfolios Program is $5,000. The minimum account balance to enroll in the tax-loss harvesting feature is $50,000. Clients eligible to enroll include individuals, IRAs, and revocable living trusts. Clients that are organizations (such as corporations and partnerships) or government entities, and clients that are subject to the Employee Retirement Income Security Act of 1974, are not eligible for the Program.

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

It is important for you to know and remember that all investments carry risks. **Investing in securities involves risk of loss that clients should be prepared to bear.**

Methods of Analysis

Robbins Farley manages client assets using a predominantly top-down approach. We believe that in the current global economy, individual securities will tend to increase in value if the macroeconomic conditions are such that it can increase. The converse would also follow: individual securities will go down if the macroeconomic factors are not favorable. Put simply, even a very good company will find increasing its share price difficult in challenging economic conditions. In addition, some sectors or individual securities may perform better or worse depending on where they are in a cycle that may be determined by time or outside economic conditions. It is with these concepts in mind that Robbins Farley begins to construct client portfolios.

Individual securities are chosen based on which securities we believe are most likely to increase in value given the current economic conditions. This does not mean Robbins Farley is a "market timer", or a firm that attempts to buy and sell securities by entering and exiting positions based on shorter term information. Rather, Robbins Farley takes a longer term view of each security but through the lens of macroeconomic conditions and trends. Securities chosen may be stocks, bonds, options and to a lesser extent, exchange traded funds (ETFs), but may also include alternative assets such as real estate investment trusts, business development companies, master limited partnerships or private placements.

Constructing Client Portfolios

Each client's portfolio will be invested according to that client's investment objectives. Robbins Farley determines these objectives with the client through reviewing client provided documents, client interviews and/or asking the client to put these objectives in writing. Once we ascertain your objectives for each account, we will develop a portfolio we believe will best fit your needs. This means allocating assets to one or more of our investment programs. The investment programs are not investment products. Clients may have different needs than others within the same investment program. Accordingly, not all clients in each investment program will have the exact same percentages of each underlying investment.

The investment program that we recommend are based on the needs of the client as compared with the typical behavior of that security type or manager, current market conditions, the client's current financial situation (including assets that may be managed by another advisor), financial goals, and the timeline to meet those goals. Because we develop an investment strategy based on your personal situation and financial goals, your asset allocation guidelines may be similar to or different from another client. The investment programs are strictly guidelines and client portfolios may differ according to the needs and investment restrictions of a particular client.

When Robbins Farley makes changes to an investment program, we try to make changes for the entire program. However, in some instances individual accounts may be traded outside of the block. This may result in accounts being traded earlier inadvertently having an advantage over accounts traded later.

The investment programs utilized include:

Growth & Income Model: Portfolios are constructed with the goal of providing ongoing income for those in retirement, while at the same time not ignoring a need for some growth of principal. Robbins Farley attempts to mitigate volatility to provide consistent income from dividends and interest payments as well as by strategically selling certain positions.

Growth Model: This is for portfolios that need an allocation designed to grow principal over time. Income is not a primary goal of this program, but it may play a role in achieving growth through compounding of interest or reinvestment of dividends. Robbins Farley attempts to mitigate risks in this program through monitoring economic cyclicality, and by utilizing screening methods such as correlation analysis and individual security research.

Income Model: For clients in need of income, and not focused on accumulation, the Income Model may be appropriate. The investments in the Income Model are chosen for their expectation to produce dividends and interest payments, which may help reduce the risk of principal loss. Especially as bond or higher income stock prices fall in the markets as interest rates rise, clients should be aware that the focus here is on the income payments, not the price of the security they hold.

We may periodically recommend changes to client portfolios to meet the individual client's objectives. It is important to remember that because market conditions can vary greatly, and each portfolio is created from each individual client's needs, clients must keep Robbins Farley informed of any changes to their circumstances, however small those changes may appear to be. Robbins Farley is better able to serve clients if we are well informed.

As assets are transitioned from a client's prior adviser(s) to Robbins Farley, there may be securities and other investments that do not fit within the investment strategy selected for the client. Accordingly, these investments will need to be sold in order to reposition the portfolio into the investment strategy selected by Robbins Farley. However, this transition process may take some time to accomplish. Some investments may not be unwound for a lengthy period of time for a variety of reasons that may include unwarranted low share prices, restrictions on trading, contractual restrictions on liquidity, tax concerns or market-related liquidity concerns. In some cases, there may be securities or investments that are never able to be sold. In the event an investment in a client account is unable to be unwound for a period of time, Robbins Farley will monitor the investment as part of its services to the client. Robbins Farley may suggest that a given investment be moved to a separate account.

Risk of Loss

There are always risks to investing. **Clients should be aware that all investments carry various types of risk including the potential loss of principal that clients should be prepared to bear.** It is impossible to name all possible types of risks. Among the risks are the following:

- **Political Risks.** Most investments have a global component, even domestic stocks. Political events anywhere in the world may have unforeseen consequences to markets around the world.
- **General Market Risks.** Markets can, as a whole, go up or down on various news releases or for no understandable reason at all. This sometimes means that the price of specific securities could go up or down without real reason, and may take some time to recover any lost value. Adding additional securities does not help to minimize this risk since all securities may be affected by market fluctuations.

- **Currency Risk.** When investing in another country using another currency, the changes in the value of the currency can change the value of your security value in your portfolio.
- **Regulatory Risk.** Changes in laws and regulations from any government can change the value of a given company and its accompanying securities. Certain industries are more susceptible to government regulation. Changes in zoning, tax structure or laws impact the return on these investments.
- **Tax Risks Related to Short Term Trading**: Clients should note that Robbins Farley may engage in short-term trading transactions. These transactions may result in short term gains or losses for federal and state tax purposes, which may be taxed at a higher rate than long term strategies. Robbins Farley endeavors to invest client assets in a tax efficient manner, but all clients are advised to consult with their tax professionals regarding the transactions in client accounts.
- **Purchasing Power Risk.** Purchasing power risk is the risk that your investment's value will decline as the price of goods rises (inflation). The investment's value itself does not decline, but its relative value does, which is the same thing. Inflation can happen for a variety of complex reasons, including a growing economy and a rising money supply.
- **Business Risk.** This can be thought of as certainty or uncertainty of income. Management comes under business risk. Cyclical companies (like automobile companies) have more business risk because of the less steady income stream. On the other hand, fast food chains tend to have steadier income streams and therefore, less business risk.
- **Financial Risk**. The amount of debt or leverage determines the financial risk of a company.
- **Default Risk.** This risk pertains to the ability of a company to service their debt. Ratings provided by several rating services help to identify those companies with more risk. Obligations of the U.S. government are said to be free of default risk.
- **Margin Risk.** "Margin" is a tool used to maximize returns on a given investment by using securities in a client account as collateral for a loan from the custodian to the client. The proceeds of that loan are then used to buy more securities. In a positive result, the additional securities provide additional return on the same initial investment. In a negative result, the additional securities provide additional losses. Margin therefore carries a higher degree of risk than investing without margin. Any client account that will use margin will do so in accordance with Regulation T. Robbins Farley may utilize margin on a limited basis for clients with higher risk tolerances.
- **Short Sales.** "Short sales" are a way to implement a trade in a security Robbins Farley feels is overvalued. In a "long" trade, the investor is hoping the security increases in price. Therefore in a long trade, the amount of the investor's loss (without margin) is the amount paid for the security. In a short sale, the investor is hoping the security decreases in price. However, unlike a long trade where the price of the security can only go from the purchase price to zero, in a short sale, the prince of the security can go infinitely upwards. Therefore, in a short sale, the potential for loss is unlimited and unknown, where the potential for loss in a long trade is limited and knowable. Robbins Farley utilizes short sales only when the client's risk tolerances permit.
- **Risks specific to private placements, sub-advisors and other managers.** If we invest some of your assets with another advisor, including a private placement, there are additional risks. These include risks that the other manager is not as qualified as we believe them to be, that the investments they use are not as liquid as we would normally use in your portfolio, or that their risk management guidelines are more liberal than we would normally employ.
- **Information Risk.** All investment professionals rely on research in order to make conclusions about investment options. This research is always a mix of both internal (proprietary) and external (provided by third parties) data and analyses. Even an adviser who says they rely solely on proprietary research must still collect data from third parties. This data, or outside research is chosen for its perceived reliability, but there is no guarantee that the data or research will be completely accurate. Failure in data accuracy or research will translate to a compromised ability by the adviser to reach satisfactory investment conclusions.
- **Small Companies.** Some investment opportunities in the marketplace involve smaller issuers.

These companies may be starting up, or are historically small. While these companies sometimes have potential for outsized returns, they also have the potential for losses because the reasons the company is small are also risks to the company's future. For example, a company's management may lack experience, or the company's capital for growth may be restricted. These small companies also tend to trade less frequently that larger companies, which can add to the risks associated with their securities because the ability to sell them at an appropriate price may be limited as compared to the markets as a whole. Not only do these companies have investment risk, if a client is invested in such small companies and requests immediate or short term liquidity, these securities may require a significant discount to value in order to be sold in a shorter time frame.

- **Concentration Risk**. Some of Robbins Farley' strategy decisions will involve the use of concentrated portfolios that may hold a limited number of securities. While mutual funds are by definition diversified within their own portfolios, the limited number of them in a client portfolio may still be concentrated. This means that a client's equity portfolio may be concentrated in a specific sector, geography, or sub-sector (among other types of potential concentrations), so that if an unexpected event occurs that affects that specific sector or geography, for example, the client's equity portfolio may be affected negatively, including significant losses.
- **Transition risk.** As assets are transitioned from a client's prior advisers to Robbins Farley there may be securities and other investments that do not fit within the asset allocation strategy selected for the client. Accordingly, these investments will need to be sold in order to reposition the portfolio into the asset allocation strategy selected by Robbins Farley. However, this transition process may take some time to accomplish. Some investments may not be unwound for a lengthy period of time for a variety of reasons that may include unwarranted low share prices, restrictions on trading, contractual restrictions on liquidity, or market-related liquidity concerns. In some cases, there may be securities or investments that are never able to be sold. The inability to transition a client's holdings into recommendations of Robbins Farley may adversely affect the client's account values, as Robbins Farley' recommendations may not be able to be fully implemented.
- **Restriction Risk**. Clients may at all times place reasonable restrictions on the management of their accounts. However, placing these restrictions may make managing the accounts more difficult, therefore lowering the potential for returns.
- **Risks Related to Investment Term & Liquidity**. Securities do not follow a straight line up in value. All securities will have periods of time when the current price of the security is not an accurate measure of its value. If you require us to liquidate your portfolio during one of these periods, you will not realize as much value as you would have had the investment had the opportunity to regain its value. Further, some investments are made with the intention of the investment appreciating over an extended period of time. Liquidating these investments prior to their intended time horizon may result in losses.

In addition to the fundamental investment strategies discussed above, Robbins Farley may also implement and/or recommend the use of inverse/enhanced market strategies or options transactions. Each of these strategies has a high level of inherent risk. (See discussion below).

<u>Inverse/Enhanced Market Strategies</u>: Robbins Farley <u>may utilize</u> long and short mutual funds and/or exchange traded funds that are designed to perform in either an: (1) <u>inverse relationship</u> to certain market indices (at a rate of 1 or more times the inverse result of the corresponding index) as an investment strategy and/or for the purpose of hedging against downside market risk; and (2) <u>enhanced relationship</u> to certain market indices (at a rate of 1 or more times the actual result of the corresponding index) as an investment strategy and/or for the purpose of increasing gains in an advancing market. There can be <u>no assurance</u> that any such strategy will prove profitable or successful. In light of these enhanced risks/rewards, a client may direct Robbins Farley, in writing, not to employ any or all such strategies for their accounts.

Options Strategies: The use of options transactions as an investment strategy involves a high level of inherent risk. Option transactions establish a contract between two parties concerning the buying or selling of an asset at a predetermined price during a specific period of time. During the term of the option contract, the buyer of the option gains the right to demand fulfillment by the seller. Fulfillment may take the form of either selling or purchasing a security depending upon the nature of the option contract. Generally, the purchase or the recommendation to purchase an option contract by Robbins Farley shall be with the intent of offsetting/"hedging" a potential market risk in a client's portfolio.

Although the intent of the options-related transactions that may be implemented by Robbins Farley is to hedge against principal risk, certain of the options-related strategies (i.e. straddles, short positions, etc),may, in and of themselves, produce principal volatility and/or risk. Therefore, a client must be willing to accept these enhanced volatility and principal risks associated with such strategies. In light of these enhanced risks, client may direct Robbins Farley, in writing, not to employ any or all such strategies for their accounts.

For detailed information on the use of options and option strategies, please refer to the Option Clearing Corp.'s Option Disclosure Document, which can be found at:
http://www.optionsclearing.com/components/docs/riskstoc.pdf

Hard copies may be ordered by calling 1-888-678-4667 or writing OCC, 1 North Wacker Drive, Suite 500 Chicago, Il 60606.

Item 9: Disciplinary Information

This item is not applicable. Clients can obtain the disciplinary history of Robbins Farley or any of our representatives from the Commonwealth of Massachusetts Securities Division.

Item 10: Other Financial Industry Activities and Affiliations

A. Broker-dealer

This item is not applicable.

B. Futures Commission Merchant/Commodity Trading Advisor

Neither the principals of Robbins Farley, nor any related persons are registered, or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

C. Relationship with Related Persons

Certain professionals of Robbins Farley are separately licensed as independent insurance agents. Robbins Farley Insurance LLC is an insurance company affiliated with Robbins Farley LLC through common control, and is the entity through which insurance products may be offered. As such, these professionals may conduct insurance product transactions for Robbins Farley clients, in their capacity as licensed insurance agents, and will receive customary commissions for these transactions in addition to any compensation received in his capacity as employees of Robbins Farley.

Commissions from the sale of insurance products will not be used to offset or as a credit against advisory fees. These professionals therefore have incentive to recommend insurance products based on the compensation to be received, rather than on a client's needs. The receipt of additional fees for insurance commissions is therefore a conflict of interest, and clients should be aware of this conflict when considering whether to engage Robbins Farley or utilize these professionals to implement any insurance recommendations.

Robbins Farley attempts to mitigate this conflict of interest by disclosing the conflict to clients, and informing the clients that they are always free to purchase insurance products through other agents or companies that are not affiliated with Robbins Farley, or to determine not to purchase the insurance product at all. Robbins Farley also attempts to mitigate the conflict of interest by requiring employees to acknowledge in the firm's Code of Ethics, their individual fiduciary duty to the clients of Robbins Farley, which requires that employees put the interests of clients ahead of their own.

D. Recommendations of Other Advisers

Robbins Farley does not utilize nor select other advisers or third party managers at this time. All assets are managed by Robbins Farley.

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

A. A copy of our Code of Ethics is available upon request. Our Code of Ethics includes discussions of our fiduciary duty to clients, political contributions, gifts, entertainment, and trading guidelines.

B. Not applicable. Robbins Farley does not recommend to clients that they invest in any security in which Robbins Farley or any principal thereof has any financial interest.

C. On occasion, an employee of Robbins Farley may purchase for his or her own account securities which are also recommended for clients. Our Code of Ethics details rules for employees regarding personal trading and avoiding conflicts of interest related to trading in one's own account. To avoid placing a trade before a client (in the case of a purchase) or after a client (in the case of a sale), all employee trades are reviewed by the Compliance Officer. All employee trades must either take place in the same block as a client trade or sufficiently apart in time from the client trade so the employee receives no added benefit. Employee statements are reviewed to confirm compliance with the trading procedures.

D. On occasion, an employee of Robbins Farley may purchase for his or her own account securities which are also recommended for clients at the same time the clients purchase the securities. Our Code of Ethics details rules for employees regarding personal trading and avoiding conflicts of interest related to trading in one's own account. To avoid placing a trade before a client (in the case of a purchase) or after a client (in the case of a sale), all employee trades are reviewed by the Compliance Officer. All employee trades must either take place in the same block as a client trade or sufficiently apart in time from the client trade so the employee receives no added benefit. Employee statements are reviewed to confirm compliance with the trading procedures.

Item 12: Brokerage Practices

A. Recommendation of Broker-Dealer

Robbins Farley does not maintain custody of client assets, though Robbins Farley may be deemed to have custody if a client grants Robbins Farley authority to debit fees directly from their account (see Item 15 below). Assets will be held with a qualified custodian, which is typically a bank or broker-dealer. Robbins Farley recommends that investment accounts be held in custody by Schwab Advisor Services ("Schwab"), which is a qualified custodian, but also may recommend other custodians if the specific client's needs merit such a recommendation. Robbins Farley is independently owned and operated and is not affiliated with Schwab. Schwab will hold your assets in a brokerage account and buy and sell securities when Robbins Farley instructs them to, which Robbins Farley does in accordance with its agreement with you. While Robbins Farley recommends that you use Schwab as custodian/broker, you will decide whether to do so and will open your account with Schwab by entering into an account agreement directly with them. Robbins Farley does not open the account for you, although Robbins Farley may assist you in doing so. For account not managed through the Program, even though your account is maintained at Schwab, we can still use other brokers to execute trades for your account as described below (see "Your brokerage and custody costs").

Client accounts enrolled in the Program are maintained at, and receive the brokerage services of, CS&Co, a broker-dealer registered with the Securities and Exchange Commission and a member of FINRA and SIPC. While clients are required to use CS&Co as custodian/broker to enroll in the Program, you will decide whether to do so and will open your account with CS&Co. by entering into an account agreement directly with them. We do not open the account for you. If you do not wish to place your assets with CS&Co, then we cannot manage your account through the Program. CS&Co may aggregate purchase and sale orders for ETFs across accounts enrolled in the Program, including both accounts for our clients and accounts for clients of other independent investment advisory firms using the Program.

How we select brokers/custodians

We seek to recommend a custodian/broker that will hold your assets and execute transactions on terms that are, overall, most advantageous when compared with other available providers and their services. We consider a wide range of factors, including both quantitative (i.e., costs) and qualitative (execution, reputation, service) factors. We do not consider whether Schwab or any other broker-dealer/custodian refers clients to Robbins Farley as part of our evaluation of these broker-dealers.

Your brokerage and custody costs

For our clients' accounts that are not managed through the Program and that Schwab maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. For some accounts, Schwab may charge you a percentage of the dollar amount of assets in the account in lieu of commissions. Schwab's commission rates and asset-based fees applicable to client accounts were negotiated based on the condition that our clients collectively maintain a total of at least $70 million of their assets in accounts at Schwab. This commitment benefits you because the overall asset-based fees you pay are lower than they would be otherwise. In addition to commissions or asset-based fees, Schwab charges you a flat dollar amount as a "prime broker" or "trade away" fee for each trade that we have executed by a different broker-dealer, but where the securities bought or the funds from the securities sold are deposited (settled) into your Schwab account. These fees are in addition to the commissions or other compensation you pay the executing broker-dealer. Because of this, in order to minimize your trading costs, we have Schwab execute most trades for your account. We have determined that having Schwab execute most trades is consistent with our duty to seek "best execution" of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above (see "How we select brokers/custodians").

1. Research and Other Soft Dollar Benefits

Products and services available to us from Schwab

Schwab Advisor Services™ (formerly called Schwab Institutional®) is Schwab's business serving independent investment advisory firms like Robbins Farley. They provide Robbins Farley and our clients, both those enrolled in the Program and our clients not enrolled in the Program, with access to its institutional brokerage services (trading, custody, reporting, and related services), many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help Robbins Farley manage or administer our clients' accounts, while others help Robbins Farley manage and grow our business. Schwab's support services are generally available on an unsolicited basis (we don't have to request them) and at no charge to Robbins Farley as long as we keep a total of at least $70 million of the assets of our firm's advisory clients in accounts at Schwab. Following is a more detailed description of Schwab's support services:

Services that benefit you

Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Schwab's services described in this paragraph generally benefit you and your account.

Services that may not directly benefit you

Schwab also makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts. They include investment research, both Schwab's own and that of third parties. We may use this research to service all or a substantial number of our clients' accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that provide access to client account data (such as duplicate trade confirmations and account statements).

- Provide access to client account data (such as duplicate trade confirmations and account statements);
- Facilitate trade execution and allocate aggregated trade orders for multiple client accounts
- Provide pricing and other market data
- Facilitate payment of our fees from our clients' accounts
- Assist with back-office functions, recordkeeping, and client reporting

Services that generally benefit only us

Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:

• Educational conferences and events
• Consulting on technology, compliance, legal, and business needs
• Publications and conferences on practice management and business succession
• Access to employee benefits providers, human capital consultants, and insurance providers

Schwab may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab may also discount or waive its fees for some of these services or pay all or a part of a third party's fees. Schwab may also provide us with other benefits, such as occasional business entertainment of our personnel.

Our interest in Schwab's services

The availability of these services from Schwab benefits us because we do not have to produce or purchase them. We don't have to pay for Schwab's services. We don't have to pay for Schwab's services so long as we keep a total of at least $70 million of client assets in accounts at Schwab. With respect to the Program, as described above under Item 4 Advisory Business, we do not pay SPT fees for its services in connection with the Program so long as we maintain
$100 Million in client assets in accounts at CS&Co that are not enrolled in the Program. Beyond that, these services are not contingent upon us committing any specific amount of business to Schwab in trading commissions or assets in custody. In light of Robbins Farley's arrangements with Schwab, Robbins Farley has an incentive to recommend that clients maintain their accounts with Schwab, based on our interest in receiving Schwab's services that benefit our business rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a potential conflict of interest. When making such a recommendation, however, Robbins Farley believes that our selection of Schwab as custodian and broker is in the best interests of our clients. Our selection is primarily supported by the scope, quality, and price of Schwab's services (see "How we select brokers/ custodians") and not Schwab's services that benefit only us.

Our Chief Compliance Officer remains available to address any questions that a client or prospective client may have regarding the above arrangements and the corresponding conflicts of interest presented.

2. Brokerage for *Client* Referrals

We do not consider whether Schwab or any other broker-dealer/custodian refers clients to Robbins Farley as part of our evaluation of these broker-dealers.

3. Directed Brokerage

Robbins Farley will, on occasion, allow directed brokerage arrangements (when a client requires that account transactions be effected through a specific broker-dealer). In such client directed arrangements, the client will negotiate terms and arrangements for their account with that broker-dealer, and Robbins Farley will not seek better execution services or prices from other broker-dealers or be able to "batch" the client's transactions for execution through other broker-dealers with orders for other accounts managed by Robbins Farley. As a result, client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case.

B. Aggregating Trades

Commission costs per client may be lower on a particular trade if all clients in whose accounts the trade is to be made are executed at the same time. This is called aggregating trades. Instead of placing a number of trades for the same security for each account, we will, when appropriate, execute one trade for all accounts and then allocate the trades to each account after execution. If an aggregate trade is not fully executed, the securities will be allocated to client accounts on a *pro rata* basis, except where doing so would create an unintended adverse consequence. (For example, if a *pro rata* division would result in a client receiving a fraction of a share, or a position in the account of less than 1%.) Schwab does not provide Robbins Farley clients with a decreased commission rate for aggregated trades.

Item 13: Review of Accounts

All accounts and corresponding financial plans will be managed on an ongoing basis, with formal reviews by a member of senior management on at least an annual basis. However, it is expected that market conditions, changes in a particular client's account, or changes to a client's circumstances will trigger an additional review of accounts.

All clients will receive statements and confirmations of trades directly from their account custodian. Additionally, all clients will receive quarterly itemized bills from Robbins Farley. Please refer to Item 15 regarding Custody.

Item 14: Client Referrals and Other Compensation

A. Economic Benefit Provided by Third Parties for Advice Rendered to Client.

   We receive an economic benefit from Schwab in the form of the support products and services it makes available to us. These products and services, how they benefit us, and the related conflicts of interest are described above in Item 12. The availability to us of Schwab's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

B. Compensation to Non-Advisory Personnel for Client Referrals.

   Robbins Farley does not compensate non-supervised persons for client referrals.

Item 15: Custody

Robbins Farley deducts fees from client accounts, but would not have custody of client funds otherwise. Clients will receive statements directly from their account custodian, as well as copies of all trade confirmations directly from their account custodian.

Clients whose fees are directly debited will provide written authorization to debit advisory fees from their accounts held by a qualified custodian chosen by the client. Each quarter, clients will receive a statement from their account custodian showing all transactions in their account, including the fee. Upon specific request, clients will receive a bill itemizing the fees to be debited, including the formula used to calculate the fee, the amount of assets the fee is based, and the time period covered by the fee. The invoice will also state that the fee was not independently calculated by the custodian.

We encourage clients to carefully review the statements and confirmations sent to them by their custodian, and to compare the information on your quarterly report prepared by Robbins Farley against the information in the statements provided directly from their account custodian. Please alert us of any discrepancies.

We also provide other services on behalf of our clients that require disclosure at ADV Part 1, Item 9. In particular, certain clients have signed asset transfer authorizations that permit their qualified custodian to rely upon instructions from Robbins Farley to transfer client funds to "third parties." In accordance with the guidance provided in the SEC Staff's February 21, 2017 Investment Adviser Association No-Action Letter, the affected accounts are not subjected to an annual surprise CPA examination.

Item 16: Investment Discretion

When Robbins Farley is engaged to provide asset management services on a discretionary basis, we will monitor your accounts to ensure that they are meeting your asset allocation requirements. If any changes are needed to your investments, we will make the changes. These changes may involve selling a security or group of investments and buying others or keeping the proceeds in cash. You may at any time place restrictions on the types of investments we may use on your behalf, or on the allocations to each security type. You may receive at your request written or electronic confirmations from your account custodian after any changes are made to your account. You will also receive monthly statements from your account custodian. Clients engaging us on a discretionary basis will be asked to execute a Limited Power of Attorney (granting us the discretionary authority over the client accounts) as well as an Investment Management Agreement that outlines the responsibilities of both the client and Robbins Farley.

Item 17: Voting Client Securities

Copies of our Proxy Voting Policies are available upon request.

From time to time, shareholders of stocks, mutual funds, exchange traded funds or other securities may be permitted to vote on various types of corporate actions. Examples of these actions include mergers, tender offers, or board elections. Clients are required to vote proxies related to their investments, or to choose not to vote their proxies. Robbins Farley will not accept authority to vote client securities. Clients will receive their proxies directly from the custodian for the client account. Robbins Farley will not give clients advice on how to vote proxies.

Item 18: Financial Information

Robbins Farley does not require the prepayment of fees more than six (6) months or more in advance and therefore has not provided a balance sheet with this brochure.

There are no material financial circumstances or conditions that would reasonably be expected to impair our ability to meet our contractual obligations to our clients.

Robbins Farley, LLC
Privacy Notice

This notice is being provided to you in accordance with the Securities and Exchange Commission's rule regarding the privacy of consumer financial information ("Regulation S-P"). Please take the time to read and understand the privacy policies and procedures that we have implemented to safeguard your nonpublic personal information.

INFORMATION WE COLLECT

Robbins Farley must collect certain personally identifiable financial information about its clients to ensure that it offers the highest quality financial services and products. The personally identifiable financial information which we gather during the normal course of doing business with you may include:

1. information we receive from you on applications or other forms;
2. information about your transactions with us, our affiliates, or others;
3. information collected through an Internet "cookie" (an information collecting device from a web server); and
4. information we receive from a consumer reporting agency.

INFORMATION WE DISCLOSE

We do not disclose any nonpublic personal information about our clients or former clients to anyone, except as permitted by law. We do not disclose your personal information to any third party for the purpose of allowing that party to market other products to you. In accordance with Section 248.13 of Regulation S-P, we may disclose all of the information we collect, as described above, to certain nonaffiliated third parties such as attorneys, accountants, auditors and persons or entities that are assessing our compliance with industry standards. We enter into contractual agreements with all nonaffiliated third parties that prohibit such third parties from disclosing or using the information other than to carry out the purposes for which we disclose the information.

CONFIDENTIALITY AND SECURITY

We restrict access to nonpublic personal information about you to those employees who need to know that information to provide financial products or services to you. We maintain physical, electronic, and procedural safeguards that comply with federal standards to guard your nonpublic personal information.

Item 1: Cover Sheet

FORM ADV PART 2B

BROCHURE SUPPLEMENT

Robert Robbins

ROBBINS FARLEY LLC
1000 Elm St. Suite 707
Manchester, NH 03101

603-703-0255

May 28, 2021

This Brochure Supplement provides information about Robert Robbins that supplements the Robbins Farley LLC Brochure. You should have received a copy of that Brochure. Please contact us at 603- 703-0255 if you have any questions about the contents of this supplement. Registration does not imply any certain level of skill or training.

Additional information about Robert Robbins is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2: Educational Background and Business Experience

Robert Robbins
Born: 1936

<u>EDUCATION:</u>

Bachelor of Electrical Engineering, Rensselaer Polytechnic Institute, 1957

Robert Robbins has held the designation of Chartered Life Underwriter (CLU®) since January 2021. Since 1927, the CLU® has been the respected risk management credential for advisors. Designees have completed eight or more college-level courses representing an average study time of 400 hours. Topics for required courses include insurance and financial planning, life insurance law, estate planning, and planning for business owners and professionals. Elective courses include such advanced topics as income taxes, group benefits, retirement planning, and health insurance. CLU® designees must meet experience and continuing education requirements and must adhere to a high ethical standard. The mark is awarded by The American College, a non-profit educator with the top level of academic accreditation.

<u>BUSINESS EXPERIENCE:</u>

Robbins Farley LLC
Principal, 03/2017 – Present

Wells Fargo Financial Network, LLC
Financial Advisor, 04/2012 – 03/2017

Morgan Stanley Smith Barney
Senior Vice President, 06/2009 – 04/2012

Citigroup Global Markets
Senior Vice President, 07/1993 – 06/2009

Item 3: Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item for Mr. Robbins.

Item 4: Other Business Activities

Mr. Robbins is the owner of a rental property in Kingston, NJ. He spends no more than 1 hour per month on this business and is unlikely to spend any time on it during the trading day.

Mr. Robbins is a trumpet player in the Nottingham Brass Quintet of Hudson, NH. He spends approximately 20 hours per month on this activity, either before or after trading hours.

Mr. Robbins is separately licensed as an independent insurance agent and owner of Robbins Farley Insurance LLC, a licensed insurance company. As such, Mr. Robbins may conduct insurance product transactions for

Robbins Farley clients, in his capacity as a licensed insurance agent, and will receive customary commissions for these transactions in addition to any compensation received in his capacity as an owner of Robbins Farley. Commissions from the sale of insurance products will not be used to offset or as a credit against advisory fees. Mr. Robbins therefore has an incentive to recommend insurance products based on the compensation to be received, rather than on a client's needs. The receipt of additional fees for insurance commissions is therefore a conflict of interest, and clients should be aware of this conflict when considering whether to engage Robbins Farley or utilize Mr. Robbins to implement any insurance recommendations. Robbins Farley attempts to mitigate this conflict of interest by disclosing the conflict to clients, and informing the clients that they are always free to purchase insurance products through other agents that are not affiliated with Robbins Farley, or to determine not to purchase the insurance product at all. Robbins Farley also attempts to mitigate the conflict of interest by requiring employees to acknowledge in the firm's Code of Ethics, their individual fiduciary duty to the clients of Robbins Farley, which requires that employees put the interests of clients ahead of their own.

Item 5: Additional Compensation

Other than salary, annual bonuses, or regular bonuses, Mr. Robbins does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through RF.

Item 6: Supervision

Mr. Robbins is a Principal of the firm, and is supervised by the Chief Compliance Officer, Colleen Farley, who can be reached at 603-703-0255. Additionally, all employees of RF are required to follow the supervisory guidelines and procedures manual which is designed to ensure compliance with securities laws in the states where RF is registered.

Item 1: Cover Sheet

FORM ADV PART 2B

BROCHURE SUPPLEMENT

Colleen Farley

ROBBINS FARLEY LLC
1000 Elm St. Suite 707
Manchester, NH 03101

603-703-0255

May 28, 2021

This Brochure Supplement provides information about Colleen Farley that supplements the Robbins Farley LLC Brochure. You should have received a copy of that Brochure. Please contact us at 603- 703-0255 if you have any questions about the contents of this supplement. Registration does not imply any certain level of skill or training.

Additional information about Colleen Farley is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2: Educational Background and Business Experience

Colleen Farley
Born: 1983

EDUCATION:

Bachelor in Liberal Arts, Saint Anselm College, 2005

BUSINESS EXPERIENCE:

Robbins Farley LLC
Managing Principal, 03/2017 – Present

Wells Fargo Financial Network, LLC
Branch Manager, 04/2012 – 03/2017

Morgan Stanley Smith Barney
Financial Advisor, 06/2009 – 04/2012

Citigroup Global Markets Inc.
Financial Advisor, 12/2004 – 06/2009

Item 3: Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item for Ms. Farley.

Item 4: Other Business Activities

Ms. Farley is the owner of Farley Family, LLC, which is utilized for the hiring/staffing of a household employee. She spends no more than 1 hour per month in this role and is unlikely to spend any time during the trading day.

Ms. Farley is separately licensed as an independent insurance agent and owner of Robbins Farley Insurance LLC, a licensed insurance company. As such, Ms. Farley may conduct insurance product transactions for Robbins Farley clients, in her capacity as a licensed insurance agent, and will receive customary commissions for these transactions in addition to any compensation received in her capacity as an owner of Robbins Farley. Commissions from the sale of insurance products will not be used to offset or as a credit against advisory fees. Ms. Farley therefore has an incentive to recommend insurance products based on the compensation to be received, rather than on a client's needs. The receipt of additional fees for insurance commissions is therefore a conflict of interest, and clients should be aware of this conflict when considering whether to engage Robbins Farley or utilize Ms. Farley to implement any insurance recommendations. Robbins Farley attempts to mitigate this conflict of interest by disclosing the conflict to clients, and informing the clients that they are always free to purchase insurance products through other agents that are not affiliated with Robbins Farley, or to determine not to purchase the insurance product at all. Robbins Farley also attempts to mitigate the conflict of interest by requiring employees to acknowledge in the firm's

Code of Ethics, their individual fiduciary duty to the clients of Robbins Farley, which requires that employees put the interests of clients ahead of their own.

Ms. Farley is a board member of Associated Grocers, Inc., a warehouse distribution center. Board members meet quarterly and she spends approximately 2 hours per month in this role, typically during the trading day. This position is not investment related.

Item 5: Additional Compensation

Other than salary, annual bonuses, or regular bonuses, Ms. Farley does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through RF.

Item 6: Supervision

Ms. Farley is a Principal of the Firm and is also the Firm's Chief Compliance Officer. She can be reached at 603-703-0255. She has no direct supervisor. However, all employees of RF are required to follow the supervisory guidelines and procedures manual which is designed to ensure compliance with securities laws in the states where RF is registered.

Item 1: Cover Sheet

FORM ADV PART 2B

BROCHURE SUPPLEMENT

David Lanzillo

ROBBINS FARLEY LLC
1000 Elm St. Suite 707
Manchester, NH 03101

603-703-0255

May 28, 2021

This Brochure Supplement provides information about David Lanzillo that supplements the Robbins Farley LLC Brochure. You should have received a copy of that Brochure. Please contact us at 603- 703-0255 if you have any questions about the contents of this supplement. Registration does not imply any certain level of skill or training.

Additional information about David Lanzillo is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2: Educational Background and Business Experience

David Lanzillo
Born: 1974

EDUCATION:

B.A. in Accounting, Bentley College, 1996

BUSINESS EXPERIENCE:

Robbins Farley LLC
Associate Financial Advisor, 03/2017 – Present

Wells Fargo Financial Network, LLC
Financial Advisor, 12/2013 – 03/2017

Edward Jones
Financial Advisor, 04/2012 – 11/2012

John Hancock/Manulife Financial
Internal Wholesaler, 11/2007 – 11/2011

Item 3: Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item for Mr. Lanzillo.

Item 4: Other Business Activities

Mr. Lanzillo is separately licensed as an independent insurance agent. As such, Mr. Lanzillo may conduct insurance product transactions for Robbins Farley clients, in his capacity as a licensed insurance agent, and will receive customary commissions for these transactions in addition to any compensation received in his capacity as an employee of Robbins Farley. Commissions from the sale of insurance products will not be used to offset or as a credit against advisory fees. Mr. Lanzillo therefore has an incentive to recommend insurance products based on the compensation to be received, rather than on a client's needs. The receipt of additional fees for insurance commissions is therefore a conflict of interest, and clients should be aware of this conflict when considering whether to engage Robbins Farley or utilize Mr. Lanzillo to implement any insurance recommendations. Robbins Farley attempts to mitigate this conflict of interest by disclosing the conflict to clients, and informing the clients that they are always free to purchase insurance products through other agents that are not affiliated with Robbins Farley, or to determine not to purchase the insurance product at all. Robbins Farley also attempts to mitigate the conflict of interest by requiring employees to acknowledge in the firm's Code of Ethics, their individual fiduciary duty to the clients of Robbins Farley, which requires that employees put the interests of clients ahead of their own.

Item 5: Additional Compensation

Other than salary, annual bonuses, or regular bonuses, Mr. Lanzillo does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through RF.

Item 6: Supervision

Mr. Lanzillo is supervised by the Chief Compliance Officer, Colleen Farley, who can be reached at 603-703-0255. Additionally, all employees of RF are required to follow the supervisory guidelines and procedures manual which is designed to ensure compliance with securities laws in the states where RF is registered.

Item 1: Cover Sheet

FORM ADV PART 2B

BROCHURE SUPPLEMENT

Dawn Sullivan

ROBBINS FARLEY LLC
1000 Elm St. Suite 707
Manchester, NH 03101

603-703-0255

May 28, 2021

This Brochure Supplement provides information about Dawn Sullivan that supplements the Robbins Farley LLC Brochure. You should have received a copy of that Brochure. Please contact us at 603- 703-0255 if you have any questions about the contents of this supplement. Registration does not imply any certain level of skill or training.

Additional information about Dawn Sullivan is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2: Educational Background and Business Experience

Dawn Sullivan
Born: 1978

EDUCATION:

A.S. EAD, North Shore Community College, 2002

BUSINESS EXPERIENCE:

Robbins Farley LLC
Investment Advisor Representative, 03/2017 – Present

Wells Fargo Financial Network, LLC
Branch Administrator, 05/2016 – 03/2017

Moors & Cabot
Registered Client Associate, 09/2011 – 04/2016

Baystate Financial
Sales Assistant, 03/2011 – 09/2011

M. Griffith Investment Services, Inc.
Sales Assistant, 04/2007 – 10/2010

Item 3: Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item for Ms. Sullivan.

Item 4: Other Business Activities

Ms. Sullivan is the owner of a rental property in Beverly, MA. She spends no more than 1 hour per month on this business and is unlikely to spend any time on it during the trading day.

Ms. Sullivan is an independent consultant for a Health & Fitness Corporation. She spends approximately 1 hour per day in this role either before or after trading hours.

Ms. Sullivan is the owner of Deculturize with Dawn, a home organization company. She spends approximately 10 hour per week in this role, either before or after trading hours.

Item 5: Additional Compensation

Other than salary, annual bonuses, or regular bonuses, Ms. Sullivan does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through RF.

Item 6: Supervision

Ms. Sullivan is supervised by the firm's Chief Compliance Officer, Colleen Farley, who can be reached at 603-703-0255. Additionally, all employees of RF are required to follow the supervisory guidelines and procedures manual which is designed to ensure compliance with securities laws in the states where RF is registered.