

# DISCLOSURE BROCHURE

THE INVESTMENT ADVISERS ACT OF 1940 RULE 203-1  
**Part 2A of Form ADV: Firm Brochure**



**Firm IARD/CRD #: 316962**

## Robinson Global Investment Management LLC

REGISTERED INVESTMENT ADVISOR

This Disclosure Brochure provides information about the qualifications and business practices of Robinson Global Investment Management LLC, which should be considered before becoming a client. You are welcome to contact us if you have any questions about the contents of this brochure - our contact information is listed to the right. Additional information about Robinson Global Investment Management LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

The information contained in this Disclosure Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any State Securities Administrator. Furthermore, the term "registered investment advisor" is not intended to imply that Robinson Global Investment Management LLC has attained a certain level of skill or training.

### CORPORATE HEADQUARTERS Principal Office & Mailing Address

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BROCHURE  
DATED

**30  
APRIL  
2022**



## MATERIAL CHANGES

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ITEM 2

There are no material changes to report. This Disclosure Brochure has been reviewed and is current as of the date indicated on the cover.



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## ADVISORY BUSINESS

ITEM 4

### Who We Are

Robinson Global Investment Management LLC (hereinafter referred to as “RGIM”, “the Company”, “we”, “us” and “our”) is a **fee-only** registered investment advisor<sup>1</sup>, formed as a Delaware limited liability company in July of 2020, to offer financial services<sup>2</sup> designed to assist you, our client<sup>3</sup>, achieve the financial stability, security, and independence you desire.

### Owners

The following person control the Company:

Name	Title	CRD#
Thomas R. Robinson	Chief Executive Officer & Managing Member	2751048
Debbie R. Hernandez	Treasurer & Chief Compliance Officer	2820463

### Our Mission

Our mission is to provide personalized wealth planning, advice, and management services to assist with your monetary needs now and in the future. Our intention is to work alongside you for the duration of your financial life as together we explore a financial course to fulfill **today’s needs, tomorrow’s dreams**, and a strategy to build a **lasting legacy** for future generations.

We will do our best to **keep you focused** on where you want to go, **offer advice** on how best to get there, and continually remind you of the importance of **maintaining a disciplined investment approach** to achieve your financial goals

### Assets Under Management

As of April 30, 2022, our assets under management totaled:

Discretionary Accounts.....	\$29,453,261
Non-Discretionary Accounts.....	\$10,084,127

### What We Do

We provide **financial solutions** that stress the importance of you making fiscally responsible decisions and disciplined economic choices in your personal life, so we can effectively help you **maximize wealth, maintain investment expectations, and manage risk**.

<sup>1</sup> The term “registered investment advisor” is not intended to imply that Robinson Global Investment Management LLC has attained a certain level of skill or training. It is used strictly to reference the fact that we are “Registered” as an “Investment Advisor” with the Florida Office of Financial Regulation - and with such other regulatory agencies that may have limited regulatory jurisdiction over our business practices.

<sup>2</sup> Robinson Global Investment Management LLC is a **fiduciary**, as defined within the meaning of Title I of the Employer Retirement Income Security Act of 1974 (“ERISA”) and/or as defined under the Internal Revenue Code of 1986 (the “Code”) for any advisory services provided to a client who is: (i) a plan participant or beneficiary of a retirement plan subject to ERISA or as described under the Code; or (ii) the beneficial owner of an Individual Retirement Account (“IRA”).

<sup>3</sup> A client could be an individual and their family members, a family office, a foundation or endowment, a charitable organization, a corporation and/or small business, a trust, a guardianship, an estate, a retirement plan, or any other type of entity to which we choose to give investment advice.



Focus of our financial services begin with identifying your standards of living and quality of lifestyle expectations. We will accomplish this through an initial **Discovery Meeting** where we will review the financial documents, we asked you to bring for discussion. Together, questions will be asked, information shared, and an evaluation made as to whether we should move to the next step. During the meeting, we will:

- ❖ Learn about your core values and guiding principles.
- ❖ Seek to understand your financial concerns and how you have been addressing them.
- ❖ Discover your financial objectives and what success looks like for you.
- ❖ Create an internal profile consisting of your current income and expenses, assets, career objectives, investment goals, risk tolerance and investment time horizon, targeted rate of return, and prior investment experience, along with personal information about your relationships, your values, and interests.

Moving forward from the Discovery Meeting, should you choose to engage us for our financial services, we will begin the process of identifying your life objectives (i.e., core values, family, monetary needs, future events, etc.). From this we will develop, at minimum, an Investment Policy Statement (“IPS”). We, then, coordinate the financial services you desire and implement a course of action. Our services include:

### Portfolio Management

We will create and manage a diversified portfolio, allocating your assets among various investments taking into consideration your stated investment objectives. Our **management strategies are not limited to any specific product or service**; however, the majority of our portfolio allocations will utilize a mix of Investment Company (“mutual fund”) products, Exchange-Traded Funds (“ETFs”) and fixed-income/debt (“bond”) instruments, cash/cash equivalent securities, and equity (“stock”) positions to achieve the best return on your investment capital<sup>4</sup>.

Information regarding our management fee structure is disclosed under “Portfolio Management Fee” in Item 5, “**Fees & Compensation**” and further description of our investment strategies under Item 8, “**Methods of Analysis, Investment Strategies & Risk of Loss.**”

### Financial Planning

Financial planning is an essential tool to help navigate unexpected events with the ultimate goal of providing the confidence and security necessary during both the working years (wealth accumulation) and retirement years (wealth distribution) of your life. However, such **planning requires a lifetime commitment**, not only from you but from us as well, your financial planner.

#### **What is a Financial Plan?**

Financial planning is an evaluation of the investment and financial options available to you based upon your defined life goals and choices. A well-designed plan is a step-by-step process intended to identify and clarify purpose, personal and family core values, needs, and priorities to align your financial decisions with your goals in all areas of your life and business. Planning includes:

<sup>4</sup> You may, at any time, impose restrictions in writing on the securities we may recommend (i.e., limit the types/amounts of particular securities purchased for your account, etc.).



1. Arriving at a series of decisions and action items based on current and future financial circumstances and defined goals and objectives.
2. Projecting the consequences of these decisions for you in the form of an economic plan - a **working blueprint**; and,
3. Implementing the protocols outlined in the plan to achieve the plan objectives.

Once complete, the financial plan, or working blueprint, becomes the benchmark that is used to help us evaluate where you are in achieving your financial goals, needs, and objectives.

### Financial Planning Composition

All forms of financial planning are a mutually defined review, analysis and evaluation of your personal financial needs and goals. In general, our financial planning may encompass one or more of the following areas of financial need as communicated by you:

- ❖ Identify and clarify personal and family core values, mission, vision, and goals.
- ❖ Preparation of the financial plan, which encompasses your:
  - Current financial situation.
  - Liquidity and asset preservation needs.
  - Wealth accumulation and growth.
  - Wealth distribution and transfer.More specifically planning may include, but is not limited to, the following modules:
  - Financial Statements - Cash Flow and Balance Sheet.
  - Savings and Emergency Reserves.
  - Asset Allocation and Investment Portfolio Analysis.
  - Potential Income Tax consequences in collaboration with your tax advisor.
  - Risk Management and Insurance Analysis.
  - Retirement Income Analysis.
  - Long-Term Healthcare.
  - Estate and Family Legacy Planning.
  - Business Succession Planning.
- ❖ Outline of recommendations, strategies, solutions, and resources.
- ❖ Prioritizing and implementing the written action plan.
- ❖ Investment consultations that allow us to create and implement a customized investment strategy tailored to your long-term investment goals.
  - Prepare an investment proposal that will include a written Investment Policy Statement (“IPS”).
- ❖ Facilitate meetings with you and/or other specialists within our network.
- ❖ Coordinate and facilitate meetings with family members, business associates, partners, or other key individuals to assist with implementing your action plan.

### Preparing the Financial Plan

We gather the necessary information to complete our analysis through personal interviews, review of various documents supplied by you, and completion of one or more profile questionnaires. Information gathered may include statements regarding your current financial status, a list of assets, insurance, wills and/or trust documents, income and expenses, Social Security eligibility, and other information<sup>5</sup> based on your financial status and future goals.

<sup>5</sup> All information provided by and to you will be kept entirely confidential. Such information will be disclosed to third parties only with mutual written consent or as may be permitted by law.



The fee for preparing a financial plan is disclosed under “Financial Planning Fee” under Item 5, “Fees & Compensation”.

### General Consulting

The consulting services we offer are independent of our portfolio management and/or financial planning services. **Under this arrangement, we do not provide any on-going management of your account or give continuous investment advice.** We will perform the desired task, but **you are responsible** for implementing any of the advice if you have not engaged us separately for that service. Consulting services can include the following:

- ❖ General and/or specific advice on non-managed investments.
- ❖ General and/or specific financial planning advice.
- ❖ Independent retirement plan benchmarking and cost analysis.
- ❖ General and/or specific life insurance or annuity contract review and recommendations.
- ❖ General and/or specific divorce planning advice.

For information on our fees for consulting services, see “General Consulting Fee” under Item 5, “Fees & Compensation.”

## FEES & COMPENSATION

ITEM 5

### Discovery Meeting

The Discovery Meeting is offered without cost or obligation after an initial introductory get-together. We schedule this Discovery Meeting for us to learn about each other. The objectives we strive to accomplish with you during this meeting are to:

- ❖ Diagnose your current financial need.
- ❖ Address your financial concerns and answer your questions on how we can assist you.
- ❖ Recommend financial resolutions aimed at lowering costs, reducing risks, increasing expected returns, and/or increasing tax efficiency to improve the likelihood of successfully achieving your goal.
- ❖ Explain our investment methodology and how our investment strategies work; and,
- ❖ Explain the benefits of financial planning and how a broad evaluation of your wealth management needs is beneficial beyond just managing your investable assets.

From the Discovery Meeting, our objective will be to move forward under an advisory and/or financial planning contract, depending on your need. We will prepare the necessary agreements to perform the desired service. If, however, you do not wish to engage us for financial services, you will be responsible for implementing any recommendations coming out of the Discovery Meeting. All financial services discussed will have been concluded and we are not responsible to implement the advice or for any on-going supervision, monitoring, and/or reporting.

### Portfolio Management Fee

Portfolio management is provided on an **asset-based fee** arrangement. Regardless of the portfolio account size, **our management fee will not exceed an annual fee rate of 0.50%** - negotiable on a client-by-client basis depending on the size and complexity of the portfolio managed. The fee is calculated **once annually** based on the **aggregate market value** of your



account on the **last business day of December of the prior calendar year**. The annual fee is then divided into four (4) equal payments billed each calendar quarter.

A minimum annual fee of \$1,200 will be billed to those accounts with portfolio values of \$240,000 or less; however, we retain the right to **waive or reduce** this minimum if we feel circumstances are warranted. Keep in mind, **because of our minimum annual fee, the above management fee rate is not applicable** unless your portfolio account value exceeds \$240,000 when calculated at yearend. Therefore, if you have a small portfolio account you may want to consider other management options.

Our management fee will be fully disclosed to you in an advisory agreement prior to conducting any portfolio management services.

### Protocols for Portfolio Management Services

The following protocols establish how we handle our portfolio management accounts and what you should expect when it comes to: (i) managing your account; (ii) your bill for investment services; and (iii) other fees charged to your account(s).

#### **Discretion**

Unless otherwise requested by you, we will establish discretionary trading authority on all management accounts to execute securities transactions at any time without your prior consent or advice.

You may, however, at any time, impose restrictions, **in writing**, on our discretionary authority (i.e., limit the types/amounts of particular securities purchased for your account, exclude the ability to purchase securities with an inverse relationship to the market, limit our use of leverage, etc.).

#### **Billing**

Unless you request other arrangements for payment of our management fee, your portfolio account will be billed in arrears based on the value of your account on the **last day of December of the prior calendar year** then divided into four (4) equal payments and debited from your account at the end of each calendar quarter (i.e., March, June, September, and December).

For new management accounts opened during the calendar year, the fee will be calculated based on the market value of the account **the day the portfolio management account was opened**. The management fee will then be prorated based on the number of days remaining in the current calendar year and billed on the calendar quarter<sup>6</sup>.

Advisory fees will be deducted first from any money market funds or cash balances. If such assets are insufficient to satisfy payment of such fees, a portion of the account assets will be liquidated to cover the fees.

#### **Deposits and Withdrawals**

Assets deposited into, or withdrawn from, your management account during a calendar year will not impact how we bill our management fee. **Our management fee is strictly**

<sup>6</sup> For example, if the market value of an account was \$500,000 and newly opened on June 17<sup>th</sup>, the fee would be calculated as follows:  $\$500,000 \times 0.50\% = \$2,500$ . The \$2,500 would then be divided by the number of days in a calendar year then multiplied by the number of days remaining in the calendar year for the account to be managed. The calculation would be as follows:  $(\$2,500 \div 365) \times 197 = \$1,349.45$ . The fee would then be divided by the remaining calendar quarters in the year (i.e., June, September, and December). In this case, 3 calendar quarters; therefore, making the quarterly fee to be \$449.81 per quarter.



based on the aggregate fair market value of your account(s) when it was calculated on the last day of December of the prior calendar year. However, deposits greater than \$250,000 may be treated as new management accounts (See footnote 6 for an example of how the fee is calculated) and our management fee adjusted. We do not want to discourage you from investing additional capital for your future but deposits of this amount or greater, in most cases, will require modifications and adjustments to your investment allocation. Therefore, we reserve the right to increase our management fee for the additional assets added to your managed account.

For assets you may withdraw during the calendar year, we **do not make partial refunds** of our portfolio management fee. Just as with deposits, withdrawals from your account will require modifications and adjustments to be made to correct the allocation of assets in your portfolio.

### Management Fee Exclusions

#### *Custodial Fees*

The above fees for all of our portfolio management services are exclusive of any charges imposed by the custodial firm who has custody of your account; including, but not limited to: (i) any Exchange/SEC fees; (ii) certain transfer taxes; (iii) service or account charges, such as, postage/handling fees, electronic fund and wire transfer fees, auction fees, debit balances, margin interest, certain odd-lot differentials and mutual fund short-term redemption fees; and (iv) brokerage and execution costs associated with securities held in your managed account. **There can also be other fees charged to your account that are unaffiliated with our management services.**

#### *Investment Company Fees*

In addition, all fees paid to us for portfolio management services are separate from any fees and expenses charged on mutual fund shares by the Investment Company or by the investment advisor managing the mutual fund portfolios. These expenses generally include management fees and various fund expense, such as 12b-1 fees. Redemption fees, account fees, purchase fees, contingent deferred sales charges, and other sales load charges may occur but are the exception within managed accounts at institutional custodians. A complete explanation of these expenses charged by the mutual funds/ETFs is contained in each mutual fund's or ETF's prospectus. You are encouraged to carefully read the fund prospectus.

For more information on the custodial firm we recommend to custody your portfolio accounts, see Item 12, "Brokerage Practices".

### Termination of Portfolio Management Services

To terminate our portfolio management services, either party (you or us), by **written notification to the other party**, may terminate the advisory agreement at any time. Such notification should include the date the termination will go into effect along with any final instructions on the account (i.e., liquidate the account, finalize all transactions and/or cease all investment activity).

In the event termination does not fall on the last day of a calendar quarter, we will bill you a prorated quarterly management fee based upon the number of days in the quarter we managed your portfolio.

**Once the termination of our advisory services has been implemented, neither party has any obligation to the other** - we no longer earn management fees or give investment advice and you become responsible for making your own investment decisions.



## Financial Planning Fee

The cost to prepare a financial plan depends on the scope of engagement, complexity of service requested, the nature of your personal and financial situation, and any other economic and personal factors that may affect the project to perform the services you desire.

Financial planning services are offered on a **negotiable hourly rate not to exceed \$200 per hour with a fixed rate not to exceed \$5,000** for the initial engagement. Planning fees may be significantly reduced, or waived, if we are managing your investment portfolio(s). The Financial planning fee will be fully disclosed up-front in a Financial Planning Agreement, which will include the cost<sup>7</sup> to review your personal/financial information and prepare the financial planning documents. Our preference is for the fee to be paid in full up front; however, we will also accept one-half the fee at the time the Agreement is signed, with the remaining balance due upon completion of the financial plan<sup>8</sup>.

You can terminate the planning agreement at any time prior to the presentation of any final planning documents. We will be compensated through the date of termination for time spent in design of such financial documents at the hourly rate agreed to in the planning agreement. If you have prepaid any fees, such un-earned fees will be returned on a pro-rata basis. **Once the financial plan has been completed and presented to you, termination of the planning agreement is no longer an option.**

## General Consulting Fee

General consulting is independent of our investment management and financial planning services. **Under this arrangement, we do not provide any on-going management of your account or give continuous investment advice.** We will perform the desired task but you are responsible for implementing any of the advice.

Our general consulting fee is a **negotiable hourly rate not to exceed \$200 per hour** for our advice. All consulting fees will be completely itemized in a billing statement or consulting agreement. For the initial consultation, the fee will be due at the end of the session. Thereafter we will bill you at the agreed upon hourly rate, should we be contacted by you for future reviews and advice. General consulting services can be terminated at any time.

## PERFORMANCE-BASED FEES & SIDE-BY-SIDE MANAGEMENT

ITEM 6

We do not charge fees based on a share of capital gains or the capital appreciation of the assets held in your accounts.

## TYPES OF CLIENTS

ITEM 7

The types of clients to whom we offer advisory services are described above under “Who We Are” in the Item 4, “Advisory Business” section. We do not require a minimum account size for portfolio management; however, our services do have a minimum fee as disclosed above

<sup>7</sup> Rarely will a fee exceed those costs outlined in the Agreement. However, there can be instances where we did not contract with you to perform a particular task and therefore merit notifying you of the additional cost prior to beginning such services.

<sup>8</sup> The recommendations made in a financial plan are generally completed within 30 to 45 days from you signing the Agreement. However, implementing the plan using outside professionals (i.e., attorneys, CPAs, etc.) may require additional time that is out of our control. Therefore, when we refer to the completion of the financial plan, we are referring to us (you and us together) finalizing your financial benchmarks/objectives before approaching any outside professional.



under “Portfolio Management Fee” in the Item 5, “Fees & Compensation” section of this Brochure.

## METHODS OF ANALYSIS, INVESTMENT STRATEGIES & RISK OF LOSS

ITEM 8

Our portfolio management services are designed to build long-term wealth while maintaining risk tolerance levels acceptable to you. We combine your financial needs and investment objectives, time horizon, and risk tolerance to yield an effective investment strategy. Your portfolio is then tailored to these unique investment parameters utilizing a mix of Investment Company (“mutual fund”) products, Exchange-Traded Funds (“ETFs”) and fixed-income/debt (“bond”) instruments, cash/cash equivalent securities, and equity (“stock”) positions to achieve the best return on your investment capital.

Other investment alternatives may be recommended depending on your unique investment objectives and risk tolerance (i.e., closed-end funds, private hedge funds and derivatives, such as: options and commodities). However, these investment vehicles bring on a different risk dynamic. If we recommend investment in one of these securities, we will discuss with you the limitations of such security and the potential risk factors to your portfolio.

### Methods of Analysis

In analyzing securities to develop an efficient asset allocation portfolio, we will use a combination of analysis techniques to gather information and to guide us in our management decisions.

#### Fundamental Analysis

Fundamental analysis considers efficiency ratios, growth rates, enterprise value, economic conditions, earnings, cash flow, book value projections, industry outlook, politics (as it relates to investments), historical data, price-earnings ratios, dividends, general level of interest rates, company management, debt ratios and tax benefits.

**RISKS** - Fundamental analysis places greater value on the long-term financial structure and health of a company, which may have little to no bearing on what is actually happening in the marketplace. Investing in companies with sound financial data/strength and a history of healthy returns can be a good long-term investment to hold in your portfolio; however, such fundamental data does not always correlate to the trading value of the stock on the exchanges. In the short-term, the stock can decrease in value as investors trade in other market sectors.

#### Quantitative Analysis

Quantitative analysis seeks to understand the behavior of a security using mathematical and statistical modeling to measure certain unique characteristics such as, for example, revenues, earnings, margins, and market share. Mathematical and statistical modeling helps us to ascertain security price and risk to ultimately help identify profitable opportunities.

**RISKS** - The key benefit of quantitative analysis is its ability to reduce complex figures to a single piece of data that is easy to grasp, discuss, and support decision-making and investment recommendations. However, using quantitative analysis alone with no further evaluation is often too narrow and sometime misleading since focus is on financial data while neglecting other details such as management experience, employee attitudes, and brand recognition.



## Technical Analysis

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Technical analysis utilizes current and historical pricing information to help us identify trends in the broader domestic and foreign equity and fixed income markets, and in the underlying assets themselves. This may involve the use of various technical indicators, such as moving averages and trend-lines, among others.

**RISKS** - Technical analysis is charting the historical market data of a stock, taking into consideration current market conditions, to forecast the direction of a future stock price rather than using fundamental tools for evaluating a company's financial strength. Technical analysis focuses on the price movement of a security trading in the marketplace. This is an ideal tool for short-term investing to identify ideal market entry/exit points. However, no market indicator is absolutely reliable, and your investment portfolio can underperform in the short-term should the market indicators be incorrect.

## Cyclical Analysis

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Market cycles provide historic tried and true timing mechanisms to indicate turning points in future market prices. By tracking historic data through charts and graphs we can improve entry and exit strategies.

**RISKS** - Cyclical data reveals regular intervals of repeated events that can be forecasted into the future to time the market on when to buy/sell a security. The risk with cyclical analysis is attempting to buy/sell a security based on a future price prediction and missing beneficial movements in price due to an error in timing. This causes harm to the value of the security being bought too high or sold too low.

**Fundamental analysis** provides us with a broad long-term view of a security that begins with determining a company's value and the strength of its financials while **quantitative analysis** assists us with portfolio optimization techniques. **Technical analysis** is short-term focusing on the statistics generated by market activity; and, **cyclical analysis** provides us with historical data on market trends to focus our technical analysis for ideal entry/exit points.

## Investment Strategies

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We are not bound to a specific investment strategy or ideology for the management of your investment portfolio. We understand markets and **money made** from increased stock values has greater risk (volatility) than **money earned** from dividends (secure and stable) in income-oriented securities. Our goal is to balance making and earning money by maintaining a disciplined management approach, regardless of the strategy, so as to not sacrifice long-term goals for short-term gains.

## Asset Allocation Strategy

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Asset allocation is a broad term used to define the process of selecting a mix of asset classes and the efficient allocation of capital to those assets by matching rates of return to a specified and quantifiable tolerance for risk. From this we may use more narrow and aggressive asset allocation derivatives.

Other features of our asset allocation strategies can utilize these portfolio-modeling structures for analyzing various possible portfolio groupings of securities.



### Modern Portfolio Theory

Modern Portfolio Theory (“MPT”)<sup>9</sup> is the analysis of a portfolio of stocks as opposed to selecting stocks based on their unique investment opportunity. The objectives of MPT is to determine your preferred level of risk and then construct a portfolio that seeks to maximize your expected return for that given level of risk.

### Strategic Allocation Modeling

Strategic asset allocation is a strategy that involves setting target allocations for various asset classes, then periodically rebalancing the portfolio back to the original allocations when target allocations deviate significantly from the initial setting due to differing returns from various assets.

### Tactical Allocation Modeling

Tactical asset allocation is a dynamic investment strategy that actively rebalances a portfolio allocation mix to take advantage of short-term market pricing anomalies or strong market sectors.

### Equal Weight Index Modeling

Equal weight is a proportional measure that gives the same importance to each stock in a portfolio or index fund with no unjustified concentration in only a few stocks or in a particular market sector. An equal weighted index is generally more diversified and less risky; however, equally weighted index funds tend to have higher stock turnover than market-cap weighted index funds, and as a result, they usually have higher trading costs.

### Sharpe Ratio Model

Sharpe Ratio<sup>10</sup> is a risk-adjusted measure of return often used to evaluate the performance of a portfolio. The Sharpe Ratio is the average return earned in excess of the risk-free rate per unit of volatility.

### Core-Satellite Approach

Core-Satellite is an investment strategy that blends a static (passive) and dynamic (active) investment management style to achieve more consistent tracking to asset class benchmarks. The objective behind the core-satellite approach is that most of the portfolio will be dedicated to matching its benchmark with low risk, while a smaller allocation will target enhanced returns so that, when the two elements are combined, the portfolio is potentially able to beat its benchmark in a risk-controlled manner.

### Value Investing Strategy

Value Investing involves selecting securities that trade for less than their intrinsic values, being more concerned with the business and its fundamentals than other influences on the stock’s price. Value investing is about finding stocks or funds invested in stocks that we believe the market has undervalued and out of favor with the market creating a deflated stock price. If we find that a company’s fundamentals reveal the stock to be undervalued, we may buy the security.

<sup>9</sup> The “Portfolio Theory” was developed and introduced by Harry M. Markowitz in his paper “Portfolio Selection” published in 1952 by the *Journal of Finance* while he was working on his PhD doctoral thesis at the University of Chicago. Mr. Markowitz further refined his theory during the latter part of the 1950’s and on into the 70’s. Along the way, his theory became known as the “Modern Portfolio Theory”. Mr. Markowitz won the Nobel Memorial Prize in Economic Sciences in 1990 as a co-laureate along with William Sharpe.

<sup>10</sup> Nobel laureate and economist William F. Sharpe developed the Sharpe Ratio.



## Managing Risk

The biggest risk to you is the risk that the value of your investment portfolio will decrease due to moves in the market. This risk is referred to as the **market risk** factor, also known as variability or volatility risk. Other important risk factors:

- ❖ **Interest Rate Risk** - Interest rate risk affects the value of bonds more than stocks. Essentially, when the interest rate on a bond begins to rise, the value (bond price) begins to drop; and vice versa, when interest rates on a bond fall, the bond value rises.
- ❖ **Equity Risk** - Equity risk is the risk that the value of your stocks will depreciate due to stock market dynamics causing one to lose money.
- ❖ **Currency Risk** - Currency risk is the risk that arises from the change in price of one currency against that of another. Investment values in international securities can be affected by changes in exchange rates.
- ❖ **Liquidity Risk** - A financial risk where a company is unable to meet short-term financial obligations without selling either hard-assets or finding another way to reduce the discrepancy between cash flow and debt obligations.
- ❖ **Inflation Risk** - The reduction of purchasing power of investments over time.
- ❖ **Commodity Risk** - Commodity risk refers to the uncertainties of future market values and the size of future income caused by the fluctuation in the prices of commodities (i.e., grains, metals, food, electricity, etc...).

The risk factors we have cited here are not intended to be an exhaustive list but are the most common risks your portfolio will encounter. Other risks that we haven't defined could be political, and over-concentration to name a few. However, notwithstanding these risk factors, the most important thing for you to understand is that regardless of how we analyze securities or the investment strategy and methodology we use to guide us in the management of your investment portfolio, **investing in a security involves a risk of loss that you should be willing and prepared to bear**; and furthermore, **past market performance is no guarantee that you will see equal or better future returns on your investment.**

## DISCIPLINARY INFORMATION

ITEM 9

We have no legal or disciplinary events to report.

## OTHER FINANCIAL INDUSTRY ACTIVITIES & AFFILIATIONS

ITEM 10

We are a fee-only registered investment advisor; none of our supervised persons are licensed, or are related to, another financial industry participant and therefore no disclosure is necessary for this item.

## CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS & PERSONAL TRADING

ITEM 11

### Code of Ethics

As a fiduciary, the Company has an affirmative duty to render continuous, unbiased investment advice, and at all times act in your best interest. To maintain this ethical responsibility, we have adopted a Code of Ethics that establishes the fundamental principles of conduct and professionalism expected by all personnel in discharging their duties. This Code is a value-



laden guide committing such persons to uphold the highest ethical standards, rooted in the most elementary maxim. Our Code of Ethics is designed to deter inappropriate behavior and heighten awareness as to what is right, fair, just and good by promoting:

- ❖ Honest and ethical conduct.
- ❖ Full, fair and accurate disclosure.
- ❖ Compliance with applicable rules and regulations.
- ❖ Reporting of any violation of the Code.
- ❖ Accountability.

To help you understand our ethical culture and standards, how we control sensitive information and what steps have been taken to prevent personnel from abusing their inside position, a copy of our Code of Ethics is available for review upon request.

## Client Transactions

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We have a fiduciary duty to ensure that your welfare is not subordinated to any interests of ours or of our personnel. The following disclosures are internal guidelines we have adopted to assist us in protecting all of our clientele.

### Participation or Interest

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It is against our policies for any owners, officers, directors and employees to invest with you or with a group of clients, or to advise you or a group of clients to invest in a private business interest or other non-marketable investment unless prior approval has been granted by our Chief Compliance Officer, and such investment is not in violation of any SEC and/or State rules and regulations.

### Insider Trading Policy

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We comply with the Insider Trading and Securities Fraud Enforcement Act of 1988. We do not share any non-public information with anyone who does not need to know and have established internal controls to guard your personal information.

### Class Actions, Bankruptcies, and Other Legal Proceedings Policy

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The Company **does not elect to participate** in class action lawsuits on your behalf. Such decisions shall remain with you or with an entity you designate. We will neither advise nor act on your behalf in legal proceedings involving companies whose securities are held in your account(s), including, but not limited to, the filing of "Proofs of Claim" in class action settlements. If desired, you may direct us to transmit copies of class action notices to you or a third party or to relate requested claim form information to you or a third party. Upon such direction, we will make commercially reasonable efforts to forward such notices in a timely manner.

## Personal Trading

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Employees of ours are permitted to personally invest their own monies in securities, which may also be, from time to time, recommended to you. Sometimes, such investment purchases are independent of, and not connected in any way to, the investment decisions made on your behalf. However, there may be instances where investment purchases for you may also be made, at or about the same time, in an employee's account. This practice can create a conflict of interest as our employees may benefit from the sale and purchase of those securities. In these situations, we have implemented the following guidelines in order to ensure our fiduciary integrity:



1. No employee acting as an Investment Advisor Representative (“IAR”), or who has discretion over your account, shall buy or sell securities for their personal portfolio(s) where their decision is substantially derived, in whole or in part, by reason of his or her employment, unless the information is also available to the investing public on reasonable inquiry. No employee of ours shall prefer his or her own interest to that of yours or any other advisory client.
2. Our Chief Compliance Officer reviews securities holdings for all our access employees on a regular basis.
3. We require that all employees act in accordance with all applicable Federal and State regulations governing registered investment advisory practices.
4. Bunched orders (See “Aggregating Trade Orders” below under Item 12, “**Brokerage Practices**”) may include employee accounts. In such cases, priority and advantage will be given to satisfy your order first regardless of the situation.
5. Any individual not in observance of the above may be subject to termination.

Personal trading activities are monitored by our Chief Compliance Officer to ensure that such activities do not impact your security or create conflicts of interest.

## BROKERAGE PRACTICES

ITEM 12

### Custodial Services

The Company has established custodial relationships with the following financial institutions:

- ❖ **Charles Schwab & Company, Inc. (“Schwab”)** - Schwab is a registered broker-dealer (member FINRA/SIPC), offering custodial services through their division Schwab Advisor Services for financial advisors.
- ❖ **Fidelity Brokerage Services, LLC (together with all affiliates, “Fidelity”)** - Fidelity is an NYSE licensed broker-dealer (member NYSE/SIPC), offering custodial services through their division Fidelity Institutional Wealth Services for investment advisors.

Both Schwab and Fidelity offer us services, which include custody of securities, trade execution, clearance and settlement of transactions. **We are not a subsidiary, or an affiliated entity, of either Schwab or Fidelity.** We have sole responsibility for investment advice rendered, and our advisory services are provided separately and independently from Schwab and Fidelity.

Our recommendation for you to custody your assets with one, or both, of these financial institutions has no direct correlation to the services we receive and the investment advice we offer you, although **we do receive economic benefits for which we do not have to pay** through our relationship with these institutions that are typically not available to retail clients. This creates an incentive for us to recommend Schwab and/or Fidelity based on the economic benefits we receive rather than on your interest in receiving most favorable execution. These economic benefits include the following products and services provided without cost or at a discount:

- ❖ Receipt of duplicate client statements and confirmations.
- ❖ Research related products and tools.
- ❖ Consulting services.
- ❖ Access to a dedicated trading desk.
- ❖ Access to batch trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to accounts).
- ❖ The ability to have advisory fees deducted directly from accounts.



- ❖ Access to an electronic communications network for order entry and account information; and,
- ❖ Access to mutual funds with no transaction fees and to certain institutional money managers.

### Direction of Transactions and Commission Rates (Best Execution)

**We have a fiduciary duty to put your interests before our own.** The advisory support services we receive from Schwab and Fidelity creates an economic benefit to us and a potential conflict of interest to you; in that, our recommendation to custody your account(s) with one, or both, of these financial institutions may have been influenced by these arrangements/services. **This is not the case;** we have selected these institutions as our custodian of choice based on:

1. Their competitive transaction charges, trading platform, and on-line services for account administration and operational support.
2. Their general reputation, trading capabilities, investment inventory, their financial strength, and our personal experience in working with the staff for each financial institution.

Since we do not recommend, suggest, or make available a selection of custodians other than Schwab or Fidelity, **best execution may not always be achieved.** Therefore, **you do not have to accept our recommendation to use either of these financial institutions** as your custodian. However, if you direct us to use another custodian, **we may not be able to provide you complete institutional services and such service may cost you more in transaction fees.**

As part of our duty to obtain best execution, we may elect, at our discretion, to utilize the services of another broker-dealer other than Schwab or Fidelity to **execute transactions** for your account. If we chose to do so, we will be responsible for negotiating the terms and arrangements for the account with that broker-dealer. We will seek to negotiate commissions, but the commissions charged by these broker-dealers could be greater than those typically charged by Schwab or Fidelity.

### Aggregating Trade Orders

Our objective in order execution is to act fairly, impartially, and to take all reasonable steps to obtain the best possible results (known as “best execution”) for our clients. Therefore, we typically bunch (aggregate) orders for a block trade when: (i) the bunching of orders is done for the purpose of achieving best execution; and, (ii) no client is systematically advantaged or disadvantaged by bunching the orders.

In consideration of these objectives, we will take into account the unique execution factors of the buy/sell order before bunching accounts for a block trade. A few of those factors are:

- ❖ **Security Trading Volume** - Bunching orders in a block trade can secure price parity and continuity for our clients during heavy trading activity.
- ❖ **Number of Clients** - The fewer the number of client accounts involved in the bunched order may not yield better pricing or order execution; it may be more advantageous to perform an individual market order for each client. In addition, preparing individual market orders, for the small number accounts involved, may be quicker to complete than preparing a bunch order.
- ❖ **Financial Instruments** - The type of security involved as well as the complexity of order can affect our ability to achieve best execution.



## REVIEW OF ACCOUNTS

ITEM 13

### Portfolio Management Reviews

Your investment strategies and investments are monitored by Thomas R. Robinson and reviewed on an on-going basis by the Investment Advisor Representative (“IAR”) managing your account. The general economy, market conditions, and/or changes in tax law can trigger more frequent reviews. Cash needs will be adjusted as necessary. Material changes in your personal/financial situation and/or investment objectives will require additional review and evaluation for us to properly advise you on revisions to previous recommendations and/or services. However, it is **your responsibility to communicate these changes** for us to make the appropriate corrections to your management account(s).

You will receive statements, at least quarterly, from Schwab and/or Fidelity where your account(s) are held in custody that identifies your current investment holdings, the cost of each of those investments, and their current market values.

You are encouraged to review the trading activities disclosed on your account statements from these institutions, which summarizes your portfolio account value, current holdings, and all account transactions made during the quarter. **It is important for you to review these documents for accurate reporting and to determine whether we are meeting your investment expectations.**

### Financial Planning Reviews

The financial planner who prepared your financial plan will work closely with you to be sure the action points identified in the financial plan have been, or are being, properly executed. Once completed, the financial plan should be reviewed at least annually. Material changes in your lifestyle choices, personal circumstances, the general economy, or tax law changes can trigger more frequent reviews. However, **it is your responsibility to communicate these changes** to us so that the appropriate adjustments can be made.

## CLIENT REFERRALS & OTHER COMPENSATION

ITEM 14

### Referral Compensation

We do not receive any economic benefit from an independent party for managing your account(s). In addition, we do not compensate persons/firms for client referrals.

### Other Compensation (Indirect Benefit)

The Company receives an indirect economic benefit from Schwab and Fidelity (See “Custodial Services” above under Item 12, “**Brokerage Practices**” for more detailed information on what these services and products could be.).

### Financial Planning Compensation

There are also potential conflicts of interest when we recommend outside consultations and professional services (i.e., attorneys, accountants, insurance agents, etc.) to implement certain aspects of a financial plan. Even though the Company and its Investment Advisor Representatives (“IARs”) do not share in any fees earned by the outside professionals when implementing the financial plan or receive any commission in recommending insurance



products or brokerage services, it does create an incentive on our part to refer your business to only those professionals that in turn refer potential clients to us. This can eliminate the possibility for you to be referred to someone who may provide equivalent professional services, and possibly at a lower cost.

Therefore, to ensure you understand the choices and risks you have regarding the financial recommendations we offer in a financial plan, the following disclosures are provided to assist you with your decisions:

- ❖ Certain aspects of a financial plan require the assistance of a Registered Representative of a broker-dealer to execute transactions. We do not earn commissions; however, the Registered Representative you hire will.
- ❖ If you need any insurance coverage, we can refer you to a licensed insurance agent. **The insurance agent will receive the normal commissions associated with such insurance transactions.**
- ❖ You are under no obligation to have any related parties that we recommend prepare planning documents (i.e., financial, estate, tax, insurance agent, registered representative, etc. ...). **You are free to choose those outside professionals to implement the recommendations made in the financial or estate plan.**
- ❖ The Company does not receive any economic benefit from referring you to another professional without first notifying you of such possibilities.

Notwithstanding such potential conflicts of interest, we strive to serve your best interest and ensure such disclosures are being properly made to you in compliance with the Investment Advisers Act of 1940, Rule 275.206.

### Retirement Rollover Compensation

Earning a management fee from recommending the rollover of retirement plan assets to an IRA we manage is considered “self-dealing” and prohibited unless we comply with the Prohibited Transaction Exemption (“PTE”) 2020-02, “Improving Investment Advice for Workers & Retirees” exemption issued by the Department of Labor (“DOL”). The DOL considers earning a management fee “self-dealing” because it increases our compensation and profits while potentially disregarding the underlying costs paid by, and the services provided under, the retirement plan that might be more beneficial to you should your retirement assets remain with the plan. Therefore, when it comes to your retirement assets, there are typically four options you should consider when leaving an employer:

- ❖ Leave the account assets in the former employer’s plan, if permitted.
- ❖ Rollover the assets to the new employer’s plan if one is available and rollovers are permitted.
- ❖ Rollover the assets to an Individual Retirement Account (an “IRA”); or,
- ❖ Cash out the retirement account assets (There may be tax consequences and/or IRS penalties depending on your age.).

Should you choose to rollover your retirement account assets to an individual IRA account, **you understand you are under no obligation to engage us to manage these assets... that you are free to take your IRA account anywhere to be managed.**



## CUSTODY

ITEM 15

### Management Fee Deduction

We do not take possession of or maintain custody of your funds or securities but will simply monitor the holdings within your portfolio and trade your account based on your stated investment objectives and guidelines. Physical possession and custody of your funds and/or securities are maintained with Schwab and/or Fidelity, as indicated above in Item 12, “**Brokerage Practices.**”

We are however defined as having custody since you have authorized us to deduct our advisory fees directly from your account. To protect you as well as to protect our advisory practice, we have implemented the following regulatory safeguards:

- ❖ We report to the regulatory authority (the Florida Office of Financial Regulation) having jurisdiction over our advisory practice that we have custody.
- ❖ Your funds and securities will be maintained with a qualified custodian (Schwab and/or Fidelity) in a separate account in your name.
- ❖ Authorization to withdraw our management fees directly from your account will be approved by you prior to engaging in any portfolio management services.
- ❖ At the time we notify the qualified custodian to withdraw our quarterly fee from your account, we will send you a quarterly notice itemizing our fee. Itemization includes the formula used to calculate our fee, the amount of assets under management the fee is based on, and the time period covered by the fee.

Schwab and Fidelity are required by law to send you, at least quarterly, statements summarizing the specific investments currently held in your account, the value of your portfolio, and account transactions. **You are encouraged to compare the financial data contained in our report and/or itemized fee notice with the financial information disclosed in your account statement from Schwab and/or Fidelity to verify the accuracy and correctness of our reporting.**

## INVESTMENT DISCRETION

ITEM 16

Unless otherwise requested by you, we have you complete our advisory agreement, which sets forth our discretionary trading authority to buy and sell securities in whatever amounts are determined to be appropriate for your account and whether such transactions are with, or without, your prior approval.

You may, at any time, impose restrictions, **in writing**, on our discretionary authority (i.e., limit the types/amounts of particular securities purchased for your account, exclude the ability to purchase securities with an inverse relationship to the market, limit our use of leverage, etc.).

## VOTING CLIENT SECURITIES

ITEM 17

**We do not vote client proxies.** You understand and agree that you retain the right to vote all proxies solicited for securities held in your managed accounts. Schwab and/or Fidelity, the custodian of your managed accounts, will mail you all proxy solicitations. Any proxy solicitations inadvertently received by us will be immediately forwarded to you for your evaluation and decision.



If you have specific questions regarding an action being solicited by the proxy that you do not understand, or you want clarification, you may contact us, and we will explain the particulars. **Keep in mind we will not advise you in a direction to vote; the ultimate decision on how you vote is your responsibility and left to you to decide.**

## FINANCIAL INFORMATION

ITEM 18

We are not required to include financial information in our Disclosure Brochure since we will not take physical custody of client funds or securities or bill client accounts six (6) months or more in advance for more than \$500.

We are not aware of any current financial conditions that are likely to impair our ability to meet our contractual commitments to you. In addition, the Company has not, nor have any of our officers and directors, been the subject of a bankruptcy petition at any time during the past ten years.

## REQUIREMENTS FOR STATE-REGISTERED ADVISERS

ITEM 19

Information of each of our principal executive officers and supervised persons can be found in the attached Form ADV Part 2B: Brochure Supplements.

**END OF DISCLOSURE BROCHURE**

## FORM ADV: PART 2B

### BROCHURE SUPPLEMENT



## ROBINSON GLOBAL INVESTMENT MANAGEMENT

### Corporate Office

Primary Location & Mailing Address

12007 Landing Way  
Hollywood, Florida 33026

### Phone:

434.813.7446

### Cellular:

813.539.8266

### Website:

www.rgimllc.com

### SUPERVISION

#### Debbie R. Hernandez

Chief Compliance Officer

### Cellular:

954.562.2312

### e-Mail:

debbie@rgimllc.com

Ms. Hernandez is responsible for the regulatory oversight of our advisory practice - ensuring our business activities are compliant with all federal and state regulations and that we are operating in compliance with our written policies and procedures.

Her other duties include, but are not limited to: supervising investment activities, preparing planning documents, and performing client reviews and meeting to discuss investment options.

BROCHURE SUPPLEMENT

DATED

3

**JANUARY  
2022**

This Brochure Supplement provides information about Thomas R. Robinson that is an accompaniment to the Disclosure Brochure for our firm, Robinson Global Investment Management LLC. You should have received both of these together as a complete disclosure packet. If you did not receive our Disclosure Brochure or if you should have questions about this Brochure Supplement for Mr. Robinson, you are welcome to contact us - our contact information is listed to the left.

Additional information about Robinson Global Investment Management LLC and Thomas R. Robinson are also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Thomas R. Robinson, CFP®, CFA®, CAIA®

CRD#: 2751048

Year of Birth: 1958

### EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

#### Education

1980 - University of Pennsylvania: Bachelor of Arts in Economics

1983 - Case Western Reserve University: Master of Accountancy

1993 - Case Western Reserve University: Doctorate of Philosophy - Management (Accounting/Fin.)

#### Licenses

FINRA Exams: Series 2 - Non-Member General Securities Examination (Retired)

Designations: **CERTIFIED FINANCIAL PLANNER™ (CFP®) Certification<sup>1</sup> (CFP® since 1988)** - The CFP® designation is issued by the Certified Financial Planner Board of Standards, Inc. The CFP® requires certificate holders to have a bachelor's degree, three (3) years professional working experience in the area of financial planning, and to successfully pass the examination process. To retain their CFP® designation certificate holders are required to pay an annual certification fee, complete 30-hours of continuing education every two (2) years and adhere to the CFP® Board's Code of Ethics and Professional Responsibility, Rules of Conduct, and Financial Planning Practice Standards.

**Chartered Financial Analyst (CFA®) Charterholder (CFA® since 1998)** - The CFA designation requires one to have a bachelor's degree, 4 (four) years professional working experience in the investment field, successfully completed course work and exams, and pledge to adhere to the CFA® institute's Code of Ethics and Standards of Professional Conduct. In addition, charterholders are required to meet rigid standards and are encouraged to meet annual continuing education requirements.

**Chartered Alternative Investment Analyst (CAIA®) Charterholder (CAIA® since 2009)** - To display the CAIA credentials, the charterholder is to have successfully passed a set of exams and have either a bachelor's degree and 1 (one) year professional working experience in the field of alternative investments, or 4 (four) years professional working experience in the field of alternative investments or be a CFA charterholder in good standing. In addition, CAIA charterholders are to pay annual membership dues.

#### Business Background

07/2020 - Present ..... Robinson Global Investment Management LLC

**Position:** Chief Executive Officer & Managing Member

07/2020 - Present ..... Positive Alpha Education, LLC

**Position:** Chief Executive Officer & Managing Member

03/2015 - 06/2020 .... AACSB International

**Position:** Chief Executive Officer

01/2007 - 01/2015 .... CFA Institute

**Position:** Managing Director

#### DISCIPLINARY INFORMATION

Mr. Robinson has not been found to be the cause of, or been found to be involved in, any civil litigation, self-regulatory organization/administrative proceeding involving investment-related business activities at any time during the past ten years; or personally ever been the subject of a criminal action.

#### OTHER BUSINESS ACTIVITIES

Mr. Robinson is not involved in any other business activities. Full focus of his attention is directed to meeting your financial and investment needs.

#### ADDITIONAL COMPENSATION

Mr. Robinson does not receive any economic benefit, sales awards, prizes or bonuses that are based on the number or dollar amount of sales, client referrals, or from opening new accounts.

#### REQUIREMENTS FOR STATE-REGISTERED ADVISERS

Mr. Robinson has not been found liable in an arbitration claim, civil litigation, self-regulatory organization/administrative proceeding, or been the subject of a bankruptcy petition at any time during the past ten years.

<sup>1</sup> Certified Financial Planner Board of Standards, Inc. owns the certification marks CFP®, CERTIFIED FINANCIAL PLANNER™, and federally registered CFP (with flame logo), which it awards to individuals who successfully complete initial and ongoing certification requirements.



## FORM ADV: PART 2B

### BROCHURE SUPPLEMENT



## ROBINSON GLOBAL INVESTMENT MANAGEMENT

### Corporate Office

Primary Location & Mailing Address

12007 Landing Way  
Hollywood, Florida 33026

Phone:  
434.813.7446

Website:  
www.rgimllc.com

### SUPERVISION

**Debbie R. Hernandez**  
Chief Compliance Officer

Cellular:  
954.562.2312

e-Mail:  
debbie@rgimllc.com

Ms. Hernandez is responsible for the regulatory oversight of our advisory practice - ensuring our business activities are compliant with all federal and state regulations and that we are operating in compliance with our written policies and procedures.

Her other duties include, but are not limited to: supervising investment activities, preparing planning documents, and performing client reviews and meeting to discuss investment options.

BROCHURE SUPPLEMENT  
DATED

**3**

**JANUARY  
2022**

This Brochure Supplement provides information about Debbie R. Hernandez that is an accompaniment to the Disclosure Brochure for our firm, Robinson Global Investment Management LLC. You should have received both of these together as a complete disclosure packet. If you did not receive our Disclosure Brochure or if you should have questions about this Brochure Supplement for Ms. Hernandez, you are welcome to contact us - our contact information is listed to the left.

Additional information about Robinson Global Investment Management LLC and Debbie R. Hernandez are also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Debbie R. Hernandez

CRD#: 2820463

Year of Birth: 1970

### EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

#### Education

1994 - Florida Atlantic University: Bachelor of Business Administration - Accounting

#### Licenses

FINRA Exams: Series 65 - Uniform Investment Adviser Law Examination

#### Business Background

09/2020 - Present ..... Robinson Global Investment Management LLC

Position: Treasurer & Chief Compliance Officer

08/2005 - 05/2007 .... Franklin Templeton Investments

Position: Director of Fund Accounting & Fund Admin. and Reporting

10/1999 - 07/2005 .... Franklin Templeton Investments

Position: Manager of Fund Accounting & Financial Reporting

01/1998 - 09/1999 .... Franklin Templeton Investments

Position: Supervisor of Fund Accounting & Quality Control

02/1997 - 12/1997 .... Franklin Templeton Investments

Position: Assistant Supervisor of Fund Accounting

06/1995 - 01/1997 .... Franklin Templeton Investments

Position: Analyst of Fund Accounting

### DISCIPLINARY INFORMATION

Ms. Hernandez has not been found to be the cause of, or been found to be involved in, any civil litigation, self-regulatory organization/administrative proceeding involving investment-related business activities at any time during the past ten years; or personally ever been the subject of a criminal action.

### OTHER BUSINESS ACTIVITIES

Ms. Hernandez is not involved in any other business activities. Full focus of her attention is directed to meeting your financial and investment needs.

### ADDITIONAL COMPENSATION

Ms. Hernandez does not receive any economic benefit, sales awards, prizes or bonuses that are based on the number or dollar amount of sales, client referrals, or from opening new accounts.

### REQUIREMENTS FOR STATE-REGISTERED ADVISERS

Ms. Hernandez has not been found liable in an arbitration claim, civil litigation, self-regulatory organization/administrative proceeding, or been the subject of a bankruptcy petition at any time during the past ten years.

