

## Bamboo Robo Advisor Inc. (WealthGap)

6/30/2020

### Form Customer Relationship Summary

#### I. Introduction

Bamboo Robo Advisor Inc. (WealthGap) is registered with the Securities and Exchange Commission (SEC) as an investment adviser. Firm is affiliated with a registered broker-dealer Tradier Brokerage Inc. that provides brokerage services to retail investors. A Customer Relationship Summary for WealthGap can be found at the bottom of [www.ewealthgap.com](http://www.ewealthgap.com)

Brokerage and investment advisory services and fees differ, and that it is important for you to understand these differences. Free and simple tools are available to research firms and financial professionals at Investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers, and investing.

#### II. What investment services and advice can you provide me?

We offer investment advisory services to retail investors through our iOS application. In connection with those services you should consider the application of the following to retail investors:

- We monitor your portfolio weekly to assess macroeconomic risks.
- When recession risks are high we apply a market hedge to your portfolio for a period of time until either the stock market has turned into a bear market or recession risks subside.
- Currently, we only offer three types of portfolios: WealthGap Alpha, WealthGap Beta, and WealthGap Hedged. WealthGap Alpha is a portfolio constructed from elite hedge fund holdings data in attempt to achieve excess market returns. WealthGap Beta is a portfolio that mirrors market returns. WealthGap Hedged is a portfolio that holds the same stocks as WealthGap Alpha but has a market hedge applied, limiting downside volatility.
- At account opening, clients are required to at least deposit 500 dollars into their accounts.

For additional information, please visit [www.ewealthgap.com](http://www.ewealthgap.com) and download our firm's form ADV to access our firm brochure.

**CONVERSATION STARTER:** Ask your financial professional:

*Given my financial situation, should I choose an investment advisory service? Why or why not?*

*How will you choose investments to recommend to me?*

*What is your relevant experience, including your licenses, education, and other qualifications? What do these qualifications mean?*

#### III. What fees will I pay?

For the services provided, you will pay to us an annual asset based fee at the rate of 1% based on the asset value of the account. The fee is payable quarterly in arrears.

For our wrap fee program, the more assets there are in a retail investor's advisory account, the more a retail investor will pay in fees, and we may therefore have an incentive to encourage the retail investor to increase the assets in his or her account.

Our wrap fee program includes custodian fees, account maintenance fees, and other transactional fees so there are no additional fees that will be charged other than the 1% fee. You may pay a fee for holding ETFs that does not show up on your statement because the ETF funds pass along their operational costs to investors.

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

For additional information, please see our wrap fee program in our ADV form at [www.ewealthgap.com](http://www.ewealthgap.com).

**CONVERSATION STARTER:** Ask your financial professional:

*Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?*

#### **IV. What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?**

When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means:

WealthGap does not consider broker-dealer or third party referrals in selecting or recommending broker-dealers to our clients as this would create a conflict of interest.

Personal trading activities are continually monitored to reasonably prevent conflicts of interest.

Should any material conflicts of interest exist that might affect the impartiality of our investment advice, they will be disclosed to you.

**CONVERSATION STARTER:** Ask your financial professional:

*How might your conflicts of interest affect me, and how will you address them?*

For additional information, please see our wrap fee program in our ADV form at [www.ewealthgap.com](http://www.ewealthgap.com).

#### **V. How do your financial professionals make money?**

Currently, there is no performance based compensation, product sales commissions, nor revenue share for our financial professionals. Should any material conflicts of interest exist that might affect the impartiality of our investment advice, they will be disclosed to you.

#### **VI. Do you or your financial professionals have legal or disciplinary history?**

No.

Visit [Investor.gov/CRS](http://Investor.gov/CRS) for a free and simple search tool to research WealthGap and its financial professionals.

**CONVERSATION STARTER:** Ask your financial professional:

*As a financial professional, do you have any disciplinary history? For what type of conduct?*

#### **VII. Additional Information**

**For additional information about our investment advisory services, please visit [www.ewealthgap.com](http://www.ewealthgap.com) and download our Form ADV. If you would like additional, up-to-date information or a copy of this disclosure, please call 917-831-0242.**

**CONVERSATION STARTER:** Ask your financial professional:

*Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?*