

Form ADV Part 2A: Firm Brochure

Item 1 – Cover Page

REVALUE



Revalue, LLC

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For more information, please contact Clara Balliet, Chief Compliance Officer.

This Firm Brochure, also known as Form ADV Part 2A, provides information about the qualifications and business practices of Revalue, LLC. (“Revalue”), an investment management firm. If clients have any questions about the contents of this Brochure, please contact us at (888) 642-2728 or inquire@revalueinvesting.com.

The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority. We are a registered investment advisor. Registration of an investment advisor does not imply any level of skill or training.

Additional information about Revalue is also available on the SEC’s website at www.adviserinfo.sec.gov. Clients can search this site by a unique identifying number, known as a CRD number. The CRD number for Revalue is 165499.

Thank you for your consideration and the opportunity to be of service.

Item 2 – Material Changes

Our summary of material changes is included in our annual amendment.

Item 3 – Table of Contents

Item 1 – Cover Page	i
Item 2 – Material Changes.....	ii
Item 3 – Table of Contents	iii
Item 4 – Advisory Business	2
Item 5 – Fees and Compensation	7
Item 6 – Performance-Based Fees.....	11
Item 7 – Types of Clients.....	11
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss	11
Item 9 – Disciplinary Information	13
Item 10 – Other Financial Industry Activities and Affiliations	13
Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	14
Item 12 – Brokerage Practices.....	15
Item 13 – Review of Accounts	16
Item 14 – Client Referrals and Other Compensation.....	17
Item 15 – Custody	17
Item 16 – Investment Discretion	18
Item 17 – Voting Client Securities	19
Item 18 – Financial Information.....	19
Item 19 – Requirements for State-Registered Advisers.....	19
Angela Louise Barbash Form ADV Part 2B: Brochure Supplement	20
Pavan Vidyadhar Muzumdar Form ADV Part 2B: Brochure Supplement.....	23
Eric Nathan Davis Form ADV Part 2B: Brochure Supplement	26
Michelle Marie Hoexum Form ADV Part 2B: Brochure Supplement.....	29

As used in this brochure, the words “we,” “our” and “us” refer to Revalue LLC. and the words “you,” “your” and “client” refer to you as either a client or prospective client of our firm. Also, you may see the term investment advisor representative throughout this brochure. As used in this brochure, our investment advisor representatives are our firm’s officers, employees, and all individuals providing investment advice on behalf of our firm.

Item 4 – Advisory Business

Our Owners and Principals

Revalue is an employee-owned Certified B Corporation® that has been providing values-driven investment management and financial planning services to clients since 2013. B Corp Certification is to companies as Fair Trade is to coffee or USDA Organic is to milk. Clients can view our public profile, including our triple bottom line scoring, and learn more about this certification by visiting <http://bcorporation.net>.

In 2014 Revalue converted to a Michigan limited liability company. Peiris Capital, LLC is the manager of the firm, and Angela Barbash, Pavan Muzumdar, and Eric Davis are the principals of the firm. Reconsider Michigan, LLC, a company controlled by Angela Barbash owns 60%; Eric Davis owns 25%; and Pieris Capital, LLC a company controlled by Pavan Muzumdar, own 15% of the membership interest in the firm. More information on the owners and their investment advisory background is available in the Brochure Supplement at the end of this Firm Brochure. Revalue is 60% woman owned and 75% person of color owned.

Our Services

Revalue provides its clients with discretionary investment management, financial planning, education, and ongoing monthly consulting services. In addition, we may refer a client to another investment advisory firm and we call this service our Referral Services. Since Revalue is a registered investment advisor, we are considered fiduciaries. This means that Revalue must always act in its clients' best interests.

Specifically, our services fall into the following categories:

- Financial Planning Services
- Investment Management Services
- Ongoing Consulting Services
- Referral Services

Financial Planning

Revalue offers financial planning through a project-based product, called a **Resiliency Plan**, as a stand-alone offering for clients who may choose to manage their own investments and not have an ongoing retainer relationship with our firm. Clients who would like us to provide these financial planning services enter into a financial planning agreement setting forth the terms and conditions of our engagement, describing the scope of our services to be provided, and our fee.

Generally, the *Resiliency Plan* covers topics such as analysis of a client's current situation and needs, the crafting of an Investment Policy Statement (IPS), cash flow projections, retirement planning, discussions about risk management and estate planning, and recommendations that include a suggested asset allocation strategy given the client's risk tolerance, time horizon, investment objectives, and goals. Clients are not obligated to engage Revalue for additional services after having received a *Resiliency Plan*.

The *Resiliency Plan* process takes 1-3 months, depending on the scope of work. While clients are engaged with Revalue for this service, they are granted courtesy access to the *Collaborative*, including the features and benefits described in the next section, and the financial planning software we use. Access to these tools ends after delivery if the client chooses to not retain Revalue moving forward.

We may recommend that a client utilize various financial products to implement our recommendations and to obtain their financial goals. If clients elect to act on any of our recommendations, clients are under no obligation to effect the transactions through Revalue or our investment adviser representatives. Clients are responsible for any fees associated with the services provided by other non-affiliated professionals. Neither Revalue nor any of our representatives will receive commissions from the sale of insurance or real estate and neither Revalue nor any of our representatives will receive compensation for the sale of securities or other products or services recommended in the financial plan unless the compensation is specifically disclosed in writing to the client. Revalue's only compensation is described under Item 5 – Fees and Compensation, below.

Investment Management Services

Revalue is a leader in the values-driven investing movement and has worked tirelessly since our 2013 founding to develop education and services that meet the needs of investors, whether they are preparing to deploy their first investment dollar in alignment with their values or they are already sophisticated in combining mission with finance.

Discretionary Investment Management.

If you choose our discretionary investment management services, we do have **discretionary authority** of investment accounts. If we have discretionary authority, we are permitted to instruct the custodian to effect securities transactions on the client's behalf without the client's prior consent. Clients that wish to engage us for discretionary investment management will sign a Client Retainer Agreement.

Clients who engage us for either ongoing consulting services (further described below) or discretionary investment management services enjoy the following features and benefits as a retainer client in our practice:

- The crafting of an IPS, which includes guidance on risk tolerance, asset allocation, and other information needed to develop a thoughtful mission-forward portfolio
- Annual meetings with an advisor to update the IPS and get one-on-one financial planning guidance
- Access to the [Collaborative](#), an online platform for peer-to-peer connection, education, and research data rooms spanning both available community investments and publicly traded investments
- Access to [RightCapital](#), the financial planning software we use, giving clients the ability to run cash flow projections, education funding scenarios, and other common personal finance analysis needs
- Access to monthly drop-in times with an advisor to ask financial planning questions
- Email support access to an advisor for financial planning questions as they arise
- Ability to submit research requests for either community investments or publicly available investments
- Access to monthly educational workshops, which are recorded for later viewing
- An invitation to other special programming designed to help investors evolve their understanding of themselves and their relationship to money, as scheduled

Clients who engage us for discretionary investment management services also receive the following features and benefits:

- Access to an advisor meetings on an on-call basis for financial planning or investment guidance needs
- Regular investment monitoring and account rebalancing through TD Ameritrade
- Assistance in setting up accounts at other custodians, such as 529 plans, HSAs, Donor Advised Funds, or Self-Directed IRAs
- Access to [Blueleaf](#) for consolidated performance reporting of all investment accounts, including those not under Revalue's management

- Coordination with other key members of the client’s advising team, such as tax and legal professionals

Description of community investment responsibilities

While Revalue provides due diligence services for community investments, we do not exercise discretion with those asset classes. This means that we do not execute on investment research on behalf of clients or place clients in community investments at our discretion.

The client takes complete responsibility for choosing whether to invest in community investments, executing the placement of those investments, and assuming the risks associated with the investments. Revalue takes responsibility for providing asset allocation guidance (how much of the portfolio may be appropriate for community investments), providing analysis of the investments, and facilitating the answering of questions by clients about the investments.

All clients are **required** to complete an *Intro to Community Investing* course and acknowledge specific risk disclosures before being able to access the community investment data rooms.

Description of public investment responsibilities

Revalue’s public investment management services are grounded in an ESG – environmental, social, and governance – approach, to both reduce risk and help clients build a better world. Our recommendations encompass a wide range of investment objectives, from conservative to aggressive, which gives the client and the advisor the flexibility to design a custom program and asset allocation that meets the client’s specific investment needs and interests. These investments are called ‘Public’ because they are found on publicly traded markets, for which there is adequate liquidity and available information. If a client engages us to manage investment accounts, we provide continuous investment advice to them based upon their individual needs and circumstances.

As noted above, all retainer clients – regardless of whether we have discretionary management authority – receive an IPS, which contains information regarding their financial situation, investment goals and objectives, exclusionary and inclusionary investment preferences, risk tolerance, and time horizons. The IPS serves as the strategic guiding document for planning and implementing investment recommendations and asset allocation.

As described in further detail in “Item 16 – Investment Discretion”, we manage investment management accounts on a discretionary basis, which means that we determine the securities to buy or sell for a client’s account without obtaining their

specific consent for each transaction. However, clients may place reasonable restrictions or exclude specific accounts, in writing, from our discretionary authority or place limitations on the types of investments for their account. If we deem clients' restrictions to be unreasonable, we will not enter into a retainer client agreement with them or we will terminate the existing agreement with them.

Clients should notify us if their financial situation or investment objectives change or if they want to impose and/or modify any reasonable restrictions on the management of the accounts. All clients are required to meet with us annually to update their IPS. We do not participate in wrap-fee programs.

Ongoing Consulting Services

Clients may choose to enter into a Consulting Agreement under which Revalue will provide on-going consulting services. These services include financial planning, preparation of an IPS, annual meetings with one-on-one financial planning guidance, and access to our online platforms with educational resources and financial projection software. These services are more fully described in our Consulting Agreement and can be tailored to the individual needs of each client.

Referral Services

In addition to the services described above, we also act as a solicitor for another investment adviser registered with the SEC. In our capacity as a solicitor, we will identify individuals and entities ("Prospective Clients") who may benefit from investment advisory services and introduce the Prospective Clients to one or more investment advisers. We have entered into a solicitation agreement with one investment adviser and we may enter into additional solicitation agreements with other investment advisers in the future. The solicitation agreements provide and will provide, in part, that if a Prospective Client becomes a client of the investment adviser, the investment adviser will pay us compensation. The compensation will be a portion of the investment advisory fees paid by the Prospective Client to the investment adviser. We disclose to the client, in writing, the amount of the fee and nature of our relationship with the investment advisory firm and the client signs an acknowledgment of such disclosure.

In connection with the referral, the Prospective Client will receive a copy of Part 2 of our Form ADV, Part 2 of Form ADV for the recommended investment adviser and a separate written disclosure document required by Rule 204(6)-3 of the Investment Advisers Act of 1940, as amended describing the compensation to be paid to us.

Current Assets Under Management

As of March 18, 2021, Revalue has approximately \$10,469,789 of discretionary assets under management. It is worth noting that many of our clients' assets are held outside

of publicly traded markets and are not under our discretionary management. Therefore, our assets under management are not an accurate estimation of the scale of our operations or our ability to provide clients with excellent service.

Item 5 – Fees and Compensation

Power of Pricing

Revalue exercises a practice we call *Power of Pricing*, which is one of many ways we work to make financial services socioeconomically inclusive. When possible, we provide a price range that clients may choose from. We recommend clients ask themselves two questions when choosing their fee:

1. What feels affordable for my financial situation?
2. How much does Revalue's existence in the world mean to me?

We will accept any dollar amount within the fee ranges stated in the sections below. For clients that choose monthly flat fee (where we are not managing investment accounts), Revalue will accept fee change requests made in writing with 30 days' advance notice of the next billing cycle.

Fees for all services other than our discretionary investment management services are negotiable based on the services selected by the client.

Providing a wide range for fees allows our services to remain accessible for people with low income or low net worth, while allowing high income or high net worth investors who want to support access to services to those who may have a hard time affording such services do so through their fee choice. Allowing investors to support each other helps us and them meet our economic justice mission. When investors do not have a clear need for low fees or a clear desire to leverage their wealth to support others, Revalue encourages investors to benchmark their fee to 1) what is affordable for them, 2) other professional services they have retained in the past, and 3) average industry fees.

Our fees cover a significant range and clients choose their fee within that range. Some of our clients choose to pay more than what may be considered a "market rate" fee for our services which then enables us to provide services to clients that cannot afford a market rate fee. If the client would like, we will provide resources to assist the client in determining their fee. Our clients have told us that they enjoy the freedom to have autonomy over their decision on the fee.

No client is required to pay more than a market rate fee and in no circumstance will our fee ever exceed 3% per annum of the client's total assets under our management.

Our advisory fee should be reasonable in light of the type of services to be provided, our experience and expertise, and the sophistication and bargaining power of our client. Lower fees for comparable services may be available from other sources. Revalue believes that our advisory fee is reasonable in light of the forgoing statement.

Financial Planning Fees

Clients can either negotiate a monthly flat fee, or engage our services on an hourly basis. See “Item 5 – Fees and Compensation (Power of Pricing)” for more details on why we provide a range of fees for this service. The fee range for the *Resiliency Plan* is \$2,000.00 to \$10,000.00. A 50% deposit is due at contract signing and the remaining 50% is due upon delivery of the plan. Payment is due immediately upon the receipt of our invoice. If clients then convert to an ongoing consulting client or an investment management client after they receive the *Resiliency Plan*, the jumpstart fee is waived.

Generally, we will complete the plan within three (3) months of signing the financial planning agreement with us. In no event will the completion of the plan be longer than six (6) months from when we begin the engagement. The jumpstart fee is negotiated with the client at the start of the relationship.

For clients receiving financial planning services on an hourly basis, our fees are negotiable and range from \$50.00 to \$150.00 an hour. A minimum of 3 hours is required for financial planning services to allow for our preparation, the time spent meeting with you, and any follow-up requirements. Hourly fees are calculated based on the time spent on the agreed upon service multiplied by our current hourly billing rates.

Investment Management Fees

All clients pay a one-time jumpstart fee of \$5.00 to \$10,000.00. The jumpstart fee covers the cost of onboarding a client to our practice and crafting the IPS and is due at contract signing. See “Item 5 – Fees and Compensation (Power of Pricing)” for more details on why we provide a range of fees for this service.

Where Revalue has discretionary authority over investment accounts, clients’ fees for those accounts are calculated on a tiered basis. The fee schedule for our discretionary investment management services is as follows:

Amounts up to \$3 million	1.25% annually
\$3 million to \$10 million	0.75% annually
Amounts over \$10 million	0.50% annually

For example, a Client with an account of \$11 million would pay 1.25% annually on the first \$3 million, 0.75% annually on the next \$7 million, and 0.50% annually on the last

\$1 million. The sum of your jumpstart fee and your asset based fee will not exceed 3% of your total assets under our management per annum.

Fees are billed quarterly in advance and begin at the start of the next calendar quarter after signing the retainer agreement. If a client's agreement is terminated prior to the end of the quarter, we promptly refund fees for the period from the termination date to the end of the quarter.

Clients may request changes to the services we provide them, as their needs change. Clients can make changes by providing us with 30 days' advance notice in writing and signing a new retainer agreement to document the change. Fees for discretionary investment management services are not negotiable.

Consulting Fees

For clients who choose to receive ongoing consulting services, our fees are billed monthly in which the initial fee due on the date of the Consulting Agreement and monthly thereafter. See "Item 5 – Fees and Compensation (Power of Pricing)" for more details on why we provide a range of fees for this service.

Referral Fees

We have entered into solicitation agreements with an investment adviser registered with the SEC. We will not receive compensation directly from Prospective Clients. Instead, if a Prospective Client enters into an investment management agreement with the recommended investment adviser, the investment adviser will pay a fee to us which will be a portion of the fee collected by the adviser from its client.

Additional Information on Fees and Services

All fees may be increased annually on January 1st, at our discretion. All clients will be notified of the anticipated fee increase. This annual increase helps Revalue maintain an adequate financial position in the face of rising business costs, as well as provide a cost of living adjustment to our employees in a manner consistent with our mission and core values.

We may change our standard fees, billing rates, or the provisions of our agreements at any time. Any changes will only become effective after 30 days' prior written notice unless the client terminates our agreement.

Our fees do not include, and clients will incur additional costs for, brokerage commissions, transaction fees, and other related costs and expenses. Clients may incur certain charges imposed by custodians, brokers, third party investments and other third parties. We do not receive any compensation from these fees or commissions. More information on brokerage fees can be found in "Item 12 – Brokerage Practices."

Termination of Agreement

Either the firm or the client may terminate the investment management or consulting agreement at any time by providing the other party with written notice. Termination of our agreement shall not affect liabilities or obligations incurred from transactions initiated under our agreement prior to the termination date, such as the purchase of investments by us for a client's account. Clients are responsible for any cost incurred in transferring assets from their account to a different account and any management fees accrued and unpaid at the time of termination. After the termination date, we shall have no further duties or obligations to a client under their agreement.

The financial planning agreement will terminate upon completion of the services. The agreement may be terminated early by the client or Revalue at any time by giving written notice to the other party. For financial planning clients, the fee will be prorated based upon the amount of work performed by Revalue to the date of termination. If the fees are less than \$600.00, Revalue will promptly refund the difference. If the fees are greater than \$600.00, the client will promptly pay the difference to Revalue. In the event of termination prior to completion of Revalue's services, we will bill the client based on hours expended or the portion of the project completed.

If the client terminates after Revalue has provided all agreed upon services but prior to the time for which payment is due, then all fees due under the agreement will be immediately due. The client will be obligated to pay for all services rendered prior to the date of termination. After the termination date, Revalue will have no further duties or obligations to the client under the agreement.

Direct Billing to the Custodian

With clients' authorization, we will directly debit investment management fees from their accounts or bill them for our fees. If clients provide us authorization to deduct fees directly from their accounts, at the same time we submit our request for payment to their custodian, the client will be sent a notice from us, in writing, stating the exact amount of the withdrawal, the specific manner or basis on which we calculated our fee, the value of the assets under our management on which the fee is based, and the time period covered by the fee. The notice will also advise the client that they have an opportunity to object to the invoiced amount and how to do so. The custodian's periodic statements will show each fee deduction from their account.

Clients may withdraw this authorization for direct billing of these fees at any time by notifying us or their custodian in writing. Fees paid directly by check are due upon receipt of the fee invoice. However, if we do not receive payment within 30 days after the date of invoice, clients will agree to authorize their custodian to pay our fee invoice promptly by debiting their account.

Other than the fees described in this Item 5, neither Revalue nor any of its investment adviser representatives, accepts compensation from the sale of securities or other investment products, including asset-based sales, charges, or service fees from the sale of mutual funds.

Item 6 – Performance-Based Fees

Revalue does not charge performance-based fees (fees based on a share of capital gains or capital appreciation of the client's assets).

Item 7 – Types of Clients

Revalue provides investment management services to individuals, high net worth individuals, family limited partnerships, corporations, trusts, estates, charitable institutions, foundations, and endowments.

Our firm does not require a minimum account balance for our investment management services. We reserve the right to decline services to a prospective client for any non-discriminatory reason.

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

Methods of Analysis

Revalue utilizes a fundamental, value-oriented approach in the selection of assets with an environmental, social, and governance overlay. Our method comprises proprietary quantitative and qualitative analysis to identify assets that in our opinion are trading at a fair value to their intrinsic value relative to the expected return. Intrinsic value is an assessment of value that is derived from our proprietary analysis.

Our qualitative analysis includes both in-house research analysis and third-party research services to arrive at an assessment of internal factors such as the governance, management team structure, internal controls, risk factors, etc.

Additionally, our analysis methodology considers the impact of external factors such as the economic and business cycle, the macro-economic environment and how it is likely to evolve over the next few months to several years out. This involves the study of both international and domestic issues including currency dynamics, inflation, interest rates, trade policies, monetary policies and fiscal policies.

Investment Strategies

Revalue provides an ongoing active management of client assets to seek returns at reduced risk by focusing on a concentrated portfolio comprising carefully selected and monitored individual stocks and bonds. We believe that individual investor's objectives and risk-tolerance can be met by suitably allocating the asset base to a portfolio comprising cash and cash equivalents, equities, carefully selected fixed income securities, and other suitable asset classes.

Rather than focusing on outperforming the market, our objective is to construct and maintain a portfolio that is designed to generate consistent returns based on client needs throughout a market cycle, in both positive and negative environments.

Where appropriate, we may recommend other asset classes such as exchange traded funds, exchange traded notes, short-term marketable securities, other fixed income products, debt, and equity investments in closely held companies, or low-cost or indexed mutual funds.

Risk of Investment Loss

We offer advice about a wide variety of investment types, including individual stocks, mutual funds, exchange traded products, fixed income products, and investments in closely held companies, each having different types and levels of risk. We will discuss these risks with clients when determining the investment objectives that will guide our investment advice for the account. We will explain and answer any questions clients have about these kinds of investments.

Past performance is not a guarantee of future returns. In today's volatile markets, investors need to understand that all financial holdings carry risk at some level regardless of how "safe" it is perceived to be. Investing in securities involves a risk of principal loss that clients should be prepared to bear.

Obtaining higher rates of return on investments typically entails accepting higher levels of risk. Investing in the debt or equity of closely held companies carries the added risk of liquidity in that these securities usually cannot be easily transferred or sold. Hence, even if these securities are highly valued, i.e. have generated returns on paper, those returns may not be easy to convert to realized gains.

We work with clients to attempt to identify the balance of risks and rewards that is appropriate and comfortable for them. However, it is still the client's responsibility to ask questions if they do not understand fully the risks associated with any investment or investment strategy.

In addition, while we strive to render our best judgment on our clients' behalf in a manner that is aligned with their personal values, many economic and market variables beyond our control can affect the performance of investments and we cannot assure that

investments will be profitable or assure that no losses will occur in investment portfolios.

Mutual Funds and Exchange-Traded Funds

Mutual funds and exchange traded funds typically charge their shareholders various advisory fees and expenses associated with the establishment and operation of the funds. These fees generally include a management fee, shareholder servicing, other fund expenses, and sometimes a distribution fee. If the fund also imposes sales charges, clients may pay an initial or deferred sales charge. These separate fees and expenses are disclosed in each fund's current prospectus, which is available from the fund or we can provide it to them upon request.

Consequently, for any type of fund investment, it is important for clients to understand that they are directly and indirectly paying two levels of advisory fees and expenses: one layer of fees at the fund level and one layer of advisory fees and expenses to us. Most mutual funds may be purchased directly, without using our services and without incurring our advisory fees.

Most mutual funds offer several "classes" of their shares which may be purchased by different types of investors or investors with different investment objectives. These are also described in the mutual funds' prospectuses. Depending on a client's investable assets, investment objectives, and time horizon, different classes may be more appropriate for their circumstances. We can discuss with clients the available classes of mutual fund shares that may be available, the different purposes for which they may be purchased, and the differences in commissions and charges associated with each share class.

Item 9 – Disciplinary Information

Registered investment advisors are required to disclose all material facts regarding any legal or disciplinary events that would be material to a client's evaluation of Revalue or our management. Revalue has no legal or disciplinary events to disclose.

Item 10 – Other Financial Industry Activities and Affiliations

Other Affiliations of Investment Adviser Representatives

As a registered investment advisor, we must disclose information regarding our business activities, other than giving investment advice, our other activities in the financial industry, and any arrangements with related persons that are material to

clients or our advisory business. We are also required to disclose if we receive cash or other economic benefits from a third-party in connection with advising clients.

Unrelated to their employment with Revalue, the following investment adviser representatives are engaged in outside business activities unrelated to Revalue's business:

- Angela Barbash may provide precious metal brokering services from time to time, at a frequency of 10 hours or fewer per year.
- Pavan Mazumdar is an executive of PCS Insight, Pieris Capital, and MVS Alliance, three companies which engage in business consulting. His time with these companies amounts to 20 hours per week.
- Eric Davis provides operational support to MVS Alliance and investment analysis services to Automation Alley for approximately 20 hours per week.

Revalue does not believe that the outside business activities create a conflict of interest because each of the representatives have sufficient time to fully discharge their duties to Revalue and engage in their outside business activity. That said, each of the representatives understand that Revalue and our clients come first in the event of an actual conflict.

Referrals to Third Party Advisers

We may recommend other investment advisory firms to Prospective Clients. See “Item 5 – Fees and Compensation (Referral Fees)” and “Item 14 – Client Referrals and Other Compensation” for more detail on these referral relationships. Prior to selecting and recommending a third-party adviser, we ensure that the recommended adviser is properly licensed or registered. In addition, we disclose to the prospective client, in writing, the amount of the fee and nature of our relationship with the investment advisory firm and the client signs an acknowledgment of such disclosure. We do not receive compensation from prospective clients for referrals to other investment advisors. Our sole compensation is paid by the investment advisor and is disclosed in writing to the prospective client.

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

We have adopted a Code of Ethics (the “Code”) describing the standards of business conduct we expect all officers, employees, and advisory representatives to follow. The Code also describes certain reporting requirements with which individuals associated with or employed by us must comply. Specifically, the Code addresses oversight of

employee securities transactions, recordkeeping requirements, and Revalue's policy of dealing fairly with all clients. The Code is designed to protect our clients by deterring misconduct, guarding against violations of securities laws, and requiring ethical behavior by all Revalue employees. Revalue's clients or prospective clients may request a free copy of the Code by calling (888) 642-2728 or inquire@revalueinvesting.com.

Our principals and investment advisor representatives may buy or sell investment products for our own personal account, also called a proprietary account, identical to those we recommend to clients. This may present a conflict of interest with our clients. Differences can arise due to variations in personal goals, investment horizons, risk tolerance, and the timing of purchases and sales. However, in accordance with our Code and to mitigate any conflict of interest, we require our representatives (and all other employees involved in making securities recommendations or who have access to recommendations or other client information) to disclose their own securities holdings and transactions, and we periodically review these statements for possible conflicts of interest. To avoid a conflict, we have adopted policies to ensure that client accounts are always traded ahead of any Revalue employee account.

We accept a fee for referring clients to a third-party investment advisory firm. Receiving a fee for solicitation activities could give rise to a conflict in that we may have an incentive to refer clients to investment advisers for which we receive a fee over other advisers. We mitigate this conflict by determining if the services offer by the adviser are suitable for the client. Clients are not required to use an investment adviser that we refer or that pays a fee to us. We disclose to the client, in writing, the amount of the fee and nature of our relationship with the investment advisory firm and the client signs an acknowledgment of such disclosure.

We have reasonably disclosed all material conflicts of interest under this Item 11 and under Item 10.

Item 12 – Brokerage Practices

Directed Brokerage & Soft Dollars

Although we do not require clients to use a specified broker-dealer, we plan to establish a brokerage relationship with a registered broker-dealer, for custodian and brokerage services. We will remain independently owned and operated and will not be affiliated with any recommended broker-dealer. Recommendations will be made solely to reduce our efforts in managing client assets and offer clients the best execution of their trades with low associated costs.

If a prospective client requests advice regarding the selection of a broker-dealer or custodian, we will provide information based upon its experience with respect to the choice to aid the client in his or her decision based solely upon the client's needs and objectives.

Soft Dollar Arrangements

We have not and do not intend to enter into any contractual third-party soft dollar arrangements, such as where we commit to place a specific level of brokerage with a specific firm in return for which the brokerage firm will pay for various research related products or services for us that are generally available for cash purchase.

Client Directed Brokerage

Clients may direct us to utilize a specified broker-dealer, of their choosing, to effect transactions for or with their account, or our agreement with them may state a directed brokerage arrangement with a specified financial services firm. Subject to our duty of best execution, we may decline a client's request to direct brokerage if, in our sole discretion, such directed brokerage arrangements would result in additional operational difficulties.

If clients choose to direct their brokerage, they should understand that, in the case of such a directed brokerage arrangement:

- They will be solely responsible for negotiating the terms and arrangements on which those brokers and dealers are engaged, and we will have no responsibility for re-viewing the fairness of those terms and arrangements;
- we will not seek better execution services or prices from other brokers and dealers in connection with transactions for their account;
- we will not be able to "batch" or "aggregate" transactions for their account with transactions for our other clients not subject to a similar such arrangement;
- we will not monitor the performance of or the services provided by the brokers and dealers so designated; and
- they 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.

Item 13 – Review of Accounts

World economic and market events are monitored on a continuous basis, as are client portfolio values and returns. Client investment accounts are reviewed at least quarterly

but generally more often by the investment review committee. The investment review committee is instructed to review all client accounts with regards to their investment policies and risk tolerance levels.

The investment review committee consists of the following individuals:

Angela Louise Barbash
Pavan Vidyadhar Muzumdar
Eric Nathan Davis
Michelle Marie Hoexum

Reviews may also be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, divorce or inheritance).

We are available via phone and e-mail to consult with clients on an ongoing basis regarding their accounts. Quarterly or as-needed meetings are available to public investment management clients. Annual meetings to evaluate clients' current situation and necessary changes to the IPS are required with all investment management clients, regardless of their portfolio mix. As described in Advisory Business above, it is the client's responsibility to inform us of any ongoing changes in their investment objectives and/or financial situation.

Item 14 – Client Referrals and Other Compensation

As stated above, we recommend investment advisers to Prospective Clients. If the Prospective Client signs an investment management or advisory agreement with the investment adviser, the investment adviser will pay us a fee which is a portion of the revenue received by the investment adviser from its client. Other than the foregoing, we do not provide compensation to any person or firm that refers clients to us. Revalue does not directly or indirectly provide compensation to any person who is not advisory personnel for client referrals.

Referrals from Financial Advisors

Revalue may receive referrals from other financial advisors, brokers, or banks when appropriate. We do not provide compensation to a referring party, nor do we obligate ourselves to giving referrals to those advisors in return for referrals received.

Item 15 – Custody

Third party custodians such as a broker-dealer, mutual fund company or bank will custody the client's accounts.

Clients receive account statements, at least quarterly, from their custodian(s). We urge clients to carefully review such statements and compare such official custodial records to the quarterly performance reports or any other report that we may provide to them, as described in the “Item 13 – Review of Accounts” beginning on page 9. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

For clients who authorize us to directly debit investment management fees from their accounts, we implement several safeguards to ensure their funds are protected. At the same time, we submit our request for payment to the custodian of our client's account, the custodian will be sent a notice from us, in writing, stating the exact amount of the withdrawal, the specific manner or basis on which we calculated our fee, the value of the assets under our management on which the fee is based, and the time period covered by the fee. The notice will also advise the custodian that they have an opportunity to object to the invoiced amount and how to do so. The custodian's periodic statements will show each fee deduction from their account. Revalue has notified the California Commissioner of Business Oversight, Division of Corporations California Securities Commissioner in writing that Revalue has or may have custody because it directly debits its investment management fees for clients who authorize such debits.

Item 16 – Investment Discretion

For clients choosing our investment management services, we generally receive discretionary authority for public market investments in writing from clients at the outset of an advisory relationship in the investment management agreement. If a client chooses to do so, discretionary authority grants us the ability to determine, without obtaining a client's specific consent, the securities to be bought or sold for their portfolio or the amount of securities to be bought or sold.

As described in more detail in “Item 4 – Advisory Business” beginning on page 2, such discretion is to be exercised in a manner consistent with their stated investment objectives for the account, by considering the size of the account, and their risk tolerance. When selecting securities and determining amounts, we observe any investment policies, limitations and restrictions clients provide to us in writing. Clients may place limitations on our discretion in our agreement that we establish with them, and such limitations may be changed by them at any time.

Also, clients may sign an agreement with their custodian, which generally includes a limited power of attorney granting us authority to direct and implement the investment and reinvestment of their assets within the account, but not direct the assets outside of the account.

Prior to entering in to an agreement with you, we are required to disclose to you in writing any material conflicts of interest that we, our representatives, or any of our

employees may have that could result affect our ability to provide unbiased and objective advice. In this brochure we have reasonably disclosed all material conflicts of interest.

Item 17 – Voting Client Securities

As a matter of firm policy and practice, we will not be responsible for responding to proxies that are solicited with respect to annual or special meetings of shareholders of securities held in clients' accounts. Proxy solicitation materials will be forwarded to clients by custodians for response and voting.

Item 18 – Financial Information

Registered investment advisors are required in this Item to provide clients with certain financial information or disclosures about its financial condition. Revalue does not require nor solicit prepayment of client fees, six months or more in advance and therefore does not need to include a balance sheet as part of this brochure as a state registered investment advisory firm.

Revalue has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients and has not been the subject of a bankruptcy proceeding.

Item 19 – Requirements for State-Registered Advisers

As described in further detail in our Part 2B of Form ADV, also called our Brochure Supplement, Angela Louise Barbash, Pavan Vidyadhar Muzumdar, Eric Nathan Davis, and Michelle Marie Hoexum are investment advisor representatives.

Angela Louise Barbash Form ADV Part 2B: Brochure Supplement

Item 1 – Cover Page

This brochure supplement provides information about Angela Barbash that supplements the Revalue LLC brochure. Clients should have received a copy of that brochure. Please contact us at (888) 642-2728, if they did not receive Revalue's brochure or if they have any questions about the contents of this supplement.

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



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Ypsilanti, Michigan 48197
(888) 642-2728 Phone
inquire@revalueinvesting.com
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Thank you for your consideration and the opportunity to be of service.

Item 2 – Educational Background and Business Experience

Name: Angela Louise Barbash, CEO

Year of birth: 1980

Education:

Eastern Michigan University, 110 credits received from 2000-2010

- Major: Cultural Anthropology
- Minor: History

Business Experience:

Revalue, LLC	Investment Advisor Representative/CEO	Jan 2012 - Present
Symmetry Financial Group	Independent Insurance Agent	Oct 2016 – Dec 2016
Reconsiderer Michigan LLC	Founder	Jan 2012 - Present
Royal Securities Company	Registered Representative	Nov 2009 – Jan 2012
Cullum & Burks Securities, Inc.	Registered Representative	Apr 2009 – Nov 2009
Edward Jones Investments	Registered Representative	Nov 2004 – Apr 2009
A. Green Financial Group	Apprentice/Registered Representative	Apr 2000 – Nov 2004

Item 3 – Disciplinary Information

Registered investment advisors are required to disclose all material facts regarding any legal or disciplinary events that would be material to a client's evaluation of each supervised person providing investment advice. No information is applicable to this Item.

Item 4 – Other Business Activities

We must inform clients if Ms. Barbash is actively engaged in any investment-related business or occupation including registrations or applications pending to register, as broker-dealers, registered representatives of broker-dealers, future commission

merchants, commodity pool operators, commodity trading advisors, or is an associated person of any of the foregoing.

Item 5 – Additional Compensation

We must also inform clients of additional compensation Ms. Barbash may receive for providing advisory services, such as sales awards or other prizes. Ms. Barbash has no information to disclose.

Item 6 – Supervision

We supervise our registered investment advisors by requiring that they adhere to our processes and procedures as described in our firm's Code of Ethics and procedural guidelines. All Revalue client communication and security trades are archived in email and client relationship management software for review and oversight by the Chief Compliance Officer, Clara Balliet. Investment recommendations are created and continuously reviewed by the Investment Committee (IC), comprised of our registered investment advisor representatives. The IC meets regularly to review existing portfolio holdings and may recommend changes to the portfolio on a quarterly basis or sooner depending on a variety of determining factors. Eric Davis currently oversees all IC investment recommendations. If clients have questions or concerns regarding Ms. Barbash, please contact Eric Davis at (888) 642-2728.

Item 7 – Requirements for State Registered Advisors

Ms. Barbash has not been found liable in any arbitration, civil, self-regulatory, or administrative proceeding or has been the subject of a bankruptcy petition.

Pavan Vidyadhar Muzumdar Form ADV Part 2B: Brochure Supplement

Item 1 – Cover Page

This brochure supplement provides information about Pavan Muzumdar that supplements the Revalue LLC brochure. Clients should have received a copy of that brochure. Please contact us at (888) 642-2728, if clients did not receive Revalue’s brochure or if clients have any questions about the contents of this supplement.

Additional information about Mr. Muzumdar is available on the SEC’s website at www.adviserinfo.sec.gov.

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Item 2 – Educational Background and Business Experience

Name: Pavan Vidyadhar Muzumdar, CFA®

Year of birth: 1968

Education:

- **Master of Science in Computer Science**, University of Massachusetts, Lowell, Massachusetts, **1993**
- **Master of Science in Electrical Engineering**, University of Lowell, Lowell, Massachusetts, **1991**
- **Bachelor of Engineering in Electronics**, University of Bombay, Bombay, India, **1989**
- Mr. Muzumdar has earned the right to use the Chartered Financial Analyst® or CFA® designation. The CFA® Institute is a global, not-for-profit organization of investment professionals. To earn the CFA® designation, Mr. Muzumdar has successfully passed all three exam levels; completed four years of qualified investment work experience; became a member of the CFA Institute; annually pledges to adhere to the CFA® Institute Code of Ethics and Standards of Professional Conduct; and applied for membership to a local CFA® member society.

Business Experience:

Revalue LLC	Investment Advisor Representative/Principal	Mar 2013 – Present
PCS Insight, LLC	Managing Director and Founder	Feb 2011 – Present
Pieris Capital, LLC	Managing Director and Founder	Jan 2008 – Present
MVS Alliance	Chief Executive Officer	Aug 1997 – Present
Lawrence Technological University	Engineering Entrepreneur in residence (Part-time)	Sep 2009 – Jun 2011
Detroit Hitch Company	Chief Operating Officer	May 2000 – Jun 2007

Item 3 – Disciplinary Information

Registered investment advisors are required to disclose all material facts regarding any legal or disciplinary events that would be material to a client's evaluation of each supervised person providing investment advice. No information is applicable to this Item.

Item 4 – Other Business Activities

We must inform clients if Mr. Muzumdar is actively engaged in any investment-related business or occupation including registrations or applications pending to register, as broker-dealers, registered representatives of broker-dealers, future commission merchants, commodity pool operators, commodity trading advisors, or is an associated person of any of the foregoing. Mr. Muzumdar has nothing to disclose.

We must also inform clients if Mr. Muzumdar is actively engaged in any business or occupation that provides a substantial source of Mr. Muzumdar's income or involves a substantial amount of time. Mr. Muzumdar is the Managing Director of PCS Insight, LLC a business consulting firm, Managing Director of Pieris Capital, LLC, a business consulting company, and CEO of MVS Alliance, a business software and consulting company.

Item 5 – Additional Compensation

We must also inform clients of additional compensation Mr. Muzumdar may receive for providing advisory services, such as sales awards or other prizes. Mr. Muzumdar has no information to disclose.

Item 6 – Supervision

We supervise our registered investment advisors by requiring that they adhere to our processes and procedures as described in our firm's Code of Ethics and procedural guidelines. All Revalue client communication and security trades are archived in email and client relationship management software for review and oversight by the Chief Compliance Officer, Clara Balliet. Investment recommendations are created and continuously reviewed by the Investment Committee (IC), comprised of our registered investment advisor representatives. The IC meets regularly to review existing portfolio holdings and may recommend changes to the portfolio on a quarterly basis or sooner depending on a variety of determining factors. Eric Davis currently oversees all IC investment recommendations. If clients have questions or concerns regarding Mr. Muzumdar, please contact Eric Davis at (888) 642-2728.

Item 7 – Requirements for State Registered Advisors

Mr. Muzumdar has not been found liable in any arbitration, civil, self-regulatory, or administrative proceeding or has been the subject of a bankruptcy petition.

Eric Nathan Davis Form ADV Part 2B: Brochure Supplement

Item 1 – Cover Page

This brochure supplement provides information about Eric Davis that supplements the Revalue LLC brochure. Clients should have received a copy of that brochure. Please contact us at (888) 642-2728, if clients did not receive Revalue’s brochure or if clients have any questions about the contents of this supplement.

Additional information about Mr. Davis is available on the SEC’s website at www.adviserinfo.sec.gov.

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Item 2 – Educational Background and Business Experience

Name: Eric Nathan Davis

Year of birth: 1988

Education:

- **Master of Business Administration – Specialty in Finance**, Eastern Michigan University, Ypsilanti, Michigan, **2012**
- **Bachelor of Business Administration in Finance**, Eastern Michigan University, Ypsilanti, Michigan, **2009**

Business Experience:

Revalue, LLC	Investment Advisor Representative	Aug 2013 – Present
Automation Alley	Technology Investment Analyst	Jan 2016 – Present
Comau, Inc.	Financial Analyst	Jun 2013 – Jul 2013
Quantum Integrators Group, LLC	Junior SAP Analyst	Oct 2012 – Mar 2013
Northwestern Mutual Financial Network	Financial Representative	Mar 2009 – Sep 2013

Item 3 – Disciplinary Information

Registered investment advisors are required to disclose all material facts regarding any legal or disciplinary events that would be material to a client’s evaluation of each supervised person providing investment advice. No information is applicable to this Item.

Item 4 – Other Business Activities

We must inform clients if Mr. Davis is actively engaged in any investment-related business or occupation including registrations or applications pending to register, as broker-dealers, registered representatives of broker-dealers, future commission merchants, commodity pool operators, commodity trading advisors, or is an associated person of any of the foregoing. In addition to his work with Revalue, Mr. Davis provides

operational support to MVS Alliance, a business software and consulting company. Mr. Davis is also a Technology Investment Analyst at Automation Alley, where he provides investment analysis and support for their entrepreneurial services.

Item 5 – Additional Compensation

We must also inform clients of additional compensation Mr. Davis may receive for providing advisory services, such as sales awards or other prizes. Mr. Davis has no information to disclose.

Item 6 – Supervision

We supervise our registered investment advisors by requiring that they adhere to our processes and procedures as described in our firm's Code of Ethics and procedural guidelines. All Revalue client communication and security trades are archived in email and client relationship management software for review and oversight by the Chief Compliance Officer, Clara Balliet. Investment recommendations are created and continuously reviewed by the Investment Committee (IC), comprised of our registered investment advisor representatives. The IC meets regularly to review existing portfolio holdings and may recommend changes to the portfolio on a quarterly basis or sooner depending on a variety of determining factors. Eric Davis currently oversees all IC investment recommendations. If clients have questions or concerns, please contact Angela Barbash at (888) 642-2728.

Item 7 – Requirements for State Registered Advisors

Mr. Davis has not been found liable in any arbitration, civil, self-regulatory, or administrative proceeding or has been the subject of a bankruptcy petition.

Michelle Marie Hoexum Form ADV Part 2B: Brochure Supplement

Item 1 – Cover Page

This brochure supplement provides information about Michelle Hoexum that supplements the Revalue LLC brochure. Clients should have received a copy of that brochure. Please contact us at (888) 642-2728, if clients did not receive Revalue's brochure or if clients have any questions about the contents of this supplement.

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

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Item 2 – Educational Background and Business Experience

Name: Michelle Marie Hoexum

Year of birth: 1970

Education:

- **Certificate of Management – School of Fundraising, Philanthropy:** Indiana University - Purdue, Indianapolis, Indiana, **2003**
- **Bachelor of Science in Finance with a Concentration in International Studies:** University of Dayton, Dayton, Ohio, **1992**

Business Experience:

Revalue LLC	Impact Advisor	Oct 2019 – Present
Propeller LLC	Principal	Jan 2015 – Present
ArtPrize	Director of Strategic Partnerships and Development	Oct 2013 – Oct 2014
US Trust	Senior Vice President, Private Client Advisor	Aug 2010 – Jul 2013
Comerica Bank	Vice President Wealth Advisor	Jun 2007 – Sep 2010

Item 3 – Disciplinary Information

Registered investment advisors are required to disclose all material facts regarding any legal or disciplinary events that would be material to a client's evaluation of each supervised person providing investment advice. No information is applicable to this Item.

Item 4 – Other Business Activities

We must inform clients if Ms. Hoexum is actively engaged in any investment-related business or occupation including registrations or applications pending to register, as

broker-dealers, registered representatives of broker-dealers, future commission merchants, commodity pool operators, commodity trading advisors, or is an associated person of any of the foregoing. In addition to her work with Revalue, Ms. Hoexum is the principal for Propeller, a business and non-profit consulting company.

Item 5 – Additional Compensation

We must also inform clients of additional compensation Ms. Hoexum may receive for providing advisory services, such as sales awards or other prizes. Ms. Hoexum has no information to disclose.

Item 6 – Supervision

We supervise our registered investment advisors by requiring that they adhere to our processes and procedures as described in our firm's Code of Ethics and procedural guidelines. All Revalue client communication and security trades are archived in email and client relationship management software for review and oversight by the Chief Compliance Officer, Clara Balliet. Investment recommendations are created and continuously reviewed by the Investment Committee (IC), comprised of our registered investment advisor representatives. The IC meets regularly to review existing portfolio holdings and may recommend changes to the portfolio on a quarterly basis or sooner depending on a variety of determining factors. Eric Davis currently oversees all IC investment recommendations. If clients have questions or concerns, please contact Eric Davis at (888) 642-2728.

Item 7 – Requirements for State Registered Advisors

Ms. Hoexum has not been found liable in any arbitration, civil, self-regulatory, or administrative proceeding or has been the subject of a bankruptcy petition.

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