

**ATIS, INC.
9717 PRAIRIE AVENUE
HIGHLAND, IN 46322**

FORM ADV, PART 2A

RBC ADVISOR

RBC UNIFIED PORTFOLIO

ATIS ADVISOR

CONTACT: JOHN J. EVANICH, PRESIDENT

WWW.ATISWEALTH.COM

JANUARY 9, 2020

This brochure provides information about the qualifications and business practices of ATIS, Inc. If you have any questions about the contents of this brochure, please contact us at 219-836-2102, or email invest@atiswealth.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about ATIS, Inc. is also available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Material Changes

In this Item 2, ATIS, Inc. is required to identify and discuss all material changes to its Advisory Programs Disclosure Document (Form ADV Part 2A Appendix 1, Wrap Fee Program Brochure). Since the June 30, 2017 version of the Disclosure Document, we have the following material updates.

We have updated certain sections to enhance our existing disclosures on products and services and, in certain instances, to provide additional clarity related to our conflicts of interest, including:

- Item 4- Changes were made to clarify the programs offered by the Firm.
- Item 5 – The RBC Resource II product name was changed to the RBC Unified Portfolio(UP)
- Item 11 – This item was added to disclose our code of ethics
- Item 19 – The formal education and business background of the Principal executive officers and management persons was improved

ATIS, Inc. will provide you with a new Disclosure Document without charge, upon request to your Financial Advisor.

ATIS, Inc. Investment Services

Form ADV, Part 2A Disclosure Brochure Index

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Item 4 - Advisory Business

The principal advisory business of ATIS, Inc. has developed with the intentions of creating an alternative to brokerage transaction compensation. This intention was amplified in 2017 when the Department of Labor proposed expanded fiduciary requirements. These proposals included the concept of level compensation offered to clients as an alternative to being charged transaction fees. Department of Labor analysis showed evidence that IRA account holders were being charged higher transaction fees versus a level compensation fee.

ATIS, Inc. has been in existence since June of 2009. John J. Evanich is the President, with an ownership percentage of 80%.

The Firm's advisory offerings are limited to "wrap fee programs". The SEC defines "wrap fee programs" as a program under which investment advisory and brokerage execution services are provided for a single "wrapped" fee that is not based on the transactions in a client's account. An investment advisory program under which all clients pay traditional, transaction-based commissions is not a "wrap fee program".

We don't believe every client is the same. So, ATIS, Inc. seeks to invest in securities with asset allocation and diversification in mind, both to realize preferable tax rates on long-term capital gains and to manage trading expenses. We may sell securities that meet our appreciation objectives or experience unfavorable fundamental or technical developments. Our principal focus is to invest our clients' funds based on their risk analysis and investment objectives.

Following are the types of programs we offer:

1. RBC Advisor - a client-directed advisory program, sponsored by RBC Capital Markets, where the client pays an asset-based fee for transactions and advice. RBC Advisor allows clients to purchase no-load and load-waived mutual funds in addition to other securities.
2. RBC Unified Portfolio (RBC UP) — A unified managed account (UMA), sponsored by RBC Capital Markets, that provides clients with access to multiple model portfolios provided by Investment Managers, mutual funds and ETFs all within a single account. The model portfolios available in RBC UP also include Specialty Portfolios which are portfolios provided by RBC Wealth Management's Portfolio Advisory Group and Global Manager Research, with RBC or Envestnet providing overlay services.
3. ATIS Advisor —an ATIS, Inc. sponsored program, partnering with NextCapital and American Funds to provide cost effective Robo-Advisor solutions for smaller accounts. The programs provide asset allocation models utilizing mutual funds and ETF's.

The RBC Advisor program account portfolios are individually created through discussion between the advisor and client. Investment selection may include equities, bonds, mutual funds, and ETF's. It is the clients' choice as to investment selection.

The RBC Unified portfolio and ATIS Advisor programs are predetermined risk based mutual fund and ETF asset allocation models. Investment models are not changed unless there is a change in client risk and investment objective.

Any client entering a wrap fee program is entitled to services as it relates to financial, retirement, and estate planning.

As of January 9, 2020, assets under management were the following:

- Discretionary - \$639,110
- Non-discretionary - \$35,847,465

Item 5 - Fees and Compensation

Table 1 presents the fee schedule for RBC Advisor Platform. **Table 2** presents the fee schedule for RBC's Unified Portfolio Platform. **Table 3** presents the fee schedule for the ATIS Advisor Program platforms.

Table 1: RBC Advisor

Account Size	Trade Allotment	ATIS, Inc. Fee Range	Fee Retained by RBC
\$25,000 - \$99,000	30	0.50 -2.00%	0.35%
\$100,000 - \$249,999	50	0.50 - 2.00%	0.25%
\$250,000 - \$499,999	100	0.50 - 2.00%	0.18%
\$500,000 - \$999,999	150	0.50 - 1.50%	0.13%
\$1,000,000 - \$1,999,999	200	0.50 - 1.50%	0.11%
\$2,000,000 - \$2,999,999	225	0.30 - 1.50%	0.09%
\$3,000,000 - \$4,999,999	250	0.20 - 1.00%	0.07%
\$5,000,000 & ABOVE	300	0.20 – 1.0%	0.05%

Mutual Fund and Exchange Traded Funds will charge operating expenses, as defined by their specific fund prospectus. These operating expenses will reduce the overall return on investment.

Over the Allotment Fee: \$12 / Trade

Table 2: RBC Unified Portfolio (RBC UP)

Account Size	ATIS, Inc. Fee Range	Fee Retained by RBC
\$25,000 - \$99,999	0.50 -2.00%	0.20%
\$100,000 - \$249,999	0.50 - 2.00%	0.15%
\$250,000 - \$499,999	0.50 - 2.00%	0.10%

\$500,000 - \$999,999	0.50 - 1.50%	0.06%
\$1,000,000 - \$1,999,999	0.50 - 1.50%	0.05%
\$2,000,000 - \$2,999,999	0.30 - 1.50%	0.03%
\$3,000,000 - \$4,999,999	0.20 - 1.00%	0.01%
\$5,000,000 & ABOVE	0.20 – 1.0%	0.00%

Mutual Fund and Exchange Traded Funds will charge operating expenses, as defined by their specific fund prospectus. These operating expenses will reduce the overall return on investment.

Table 3: ATIS Advisor Program

Platform Vendor	Vendor Fee	Fee Retained by RBC/Capital Bank
NextCapital	0.75%	0.15%
America Funds (F-2 Series)	1.00% + Fund Operating Expense	Fund Operating Expense

Calculation of Program Fees

RBC Advisor & UP

The Program Fee is calculated as a percentage of assets under management, including securities, cash, money market funds, RBC Insured Deposit balances, or RBC Cash Plus balances or Credit Interest Program balances and the full value of any assets purchased on margin. Program Fees are generally payable in advance on a quarterly basis, and are calculated based on RBC Capital Markets appraisal of the market value of the billable assets in the account as of the last business day of the preceding calendar quarter.

Program Fees are prorated for any billing period that is less than a complete quarter. For accounts enrolled in the RBC Advisor and Consulting Solutions Programs, RBC Capital Markets may calculate an additional Program Fee or refund a portion of the quarterly fee paid in advance if the billable assets in the account increases or decreases by \$10,000 or more. Increases or decreases of the billable assets may be caused by, but is not limited to, the following: deposits, withdrawals, and conversions or sale of certain mutual fund share classes. For Accounts enrolled in the RBC Unified Portfolio Program, deposits to or withdrawals from the Account of cash or securities with a value equal to or greater than \$10,000 will be billed at the applicable fee rate on a pro-rata basis. For all Programs, increases and decreases of the billable assets will offset each other and the net amount will be used to calculate on a daily basis an additional Program Fee or refund to your Account. In each case, the additional fee or refund will be equal to the applicable fee rate times the amount of the increase or decrease, pro-rated based on the number of days from the date of the triggering event to the last day of the quarter.

Each of RBC CM and Correspondent Firm reserve the right, in their sole discretion, to adjust Program Fees for changes in security type, trading activity or Account size at any

time without notice. Additionally, RBC CM reserves the right to increase any or all of the Program Fees and/or charges upon thirty (30) days' advance written notice to you.

The quarterly Program Fee will be deducted directly from your Program Account unless otherwise indicated by you. You may be able to pay Program Fees from assets outside your Program Account, provided the Account is not a retirement account, or with assets in which RBC CM is not custodian. Automatic fee deductions will be funded from available cash or the proceeds of the sale of securities in the account.

ATIS Advisor

The NextCapital Program Fees are typically expressed as an annual percentage of a client's average daily net assets managed by SSGA Funds Management, calculated daily and paid quarterly, and deducted directly from client assets. For Funds where SSGA FM acts as sub-adviser, clients are billed for the fees. In certain situations, SSGA FM may agree to waive or reimburse a portion of its advisory fee.

American Funds F-2 shares are used in their program. Fees are calculated by AFS for each quarterly period ending the last business day of February, May, August, and November, and shall be the product of the following:

1. The average daily net asset value of the clients' assets invested in the shares of the funds through the program during the quarter.
2. The number of days in the quarter.
3. The rate agreed to by the parties divided by the number of days in the year. The fees shall be paid within 30 days following the end of the quarter for which such fees are payable.

AFS shall deduct fees from client accounts as elected by the Firm on the class F-2 direct fee debiting schedule.

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

ATIS, Inc. does not currently accept performance-based fees- that is, fees based on a share of capital gains on or capital appreciation of the assets of a client.

Item 7 - Types of Clients

ATIS, Inc. clients are individuals and trusts who are seeking financial planning services and an alternative to transaction fee commission charges. The majority are IRA rollover accounts. RBC Capital Markets has established a minimum asset balance of \$25,000 for each sponsored program. The initial deposit for the ATIS Advisor Programs are as follows:

- American Funds - \$250.
- Next Capital - \$5,000.

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

ATIS, Inc. uses a combination of technical and fundamental methods to assess risks and opportunities in the capital markets. Fundamental data help us identify companies, industries, and sectors with compelling financial characteristics. Technical data help us identify securities with attractive supply-demand characteristics. These methods of evaluation do not eliminate investment risk. Investing in securities involves risk of loss that a client should be prepared to bear.

Throughout our investment process, we may review numerous sources of information: financial newspapers and magazines, inspections of corporate activities; research materials prepared by others; corporate rating services; annual reports; prospectus, and filings with the SEC; and company press releases.

ATIS, Inc. seeks to invest in securities with asset allocation and diversification in mind, both to realize preferable tax rates on long term capital gains and to manage trading expenses. We may sell securities that meet our appreciation objectives or experience unfavorable fundamental or technical developments. Our principal focus is to invest our clients' funds based on their risk analysis and investment objectives.

Item 9 - Disciplinary Information

ATIS, Inc. has no material legal or disciplinary events to report.

Item 10 - Other Financial Industry Activities and Affiliations

ATIS, Inc. is a full-service brokerage and financial services firm, registered as a broker-dealer with the U.S. Securities and Exchange Commission. We conduct our brokerage business on a fully disclosed basis through RBC Capital Markets.

Item 11 - Code of Ethics, Participation or Interests in Client Transactions and Personal Trading

ATIS, Inc. is committed to ensuring that in our capacity as an investment advisor, as well as a broker-dealer, we achieve the objectives below, as reflected in our Code of Ethics:

- Act in the best interests of our clients and not allow personal interests or the interests of the organization to take precedence over the interests of our clients;

- Act with due skill, care and diligence in conducting our business and all transactions and trading activities;
- Preserve client confidentiality at all times;
- Respect the intellectual property rights of others;
- Prevent and/or fully disclose any perceived or real conflicts of interest;
- Protect and promote the integrity of the market;
- Preserve honesty, integrity and trust in all communications with clients, employees and shareholders;
- Encourage and foster an organization and work environment that promotes the internal reporting through a defined escalation path regarding violations of the Code of Ethics as related to securities transactions, personal trading activities of employees and supervisory personnel, and employee behavior;
- Comply with applicable securities laws, rules, and regulations through leveraging an ethics-based approach;
- Promote honest and ethical conduct by all employees, Financial Advisors, and executives, including the ethical management of actual or apparent conflicts of interest between external, personal and professional relationships;
- Promote full, fair, accurate, and understandable disclosure in reports, documents, and client communications that we create, submit, and disseminate; and
- Establish accountability on the part of employees, Financial Advisors, and executives regarding adherence to the Code of Ethics.

Item 12 - Brokerage Practices

We do not receive research or other products or services from a broker-dealer or third party in connection with client securities transactions.

We do not consider or recommend any other broker-dealers. There are no third party relations.

Item 13 - Review of Accounts

Individual accounts are reviewed periodically by ATIS, Inc.'s compliance officer and sales manager. Certain clients may impose restrictions on their holdings. In accommodating those restrictions, we evaluate any resulting differences between a specific account and the firm's model portfolios very closely. Some accounts, based on the account design, are monitored on a portfolio management systems (known as Advisory Link, RBC Portfolio View and RBC Circle Black) that provides current and comprehensive information concerning account performance, asset allocation and the progress of individual positions in the portfolio.

Account review is a routine firm function, but it can be triggered or intensified by unexpected performance, shifting market conditions, or changing client preferences or circumstances. In both routine and unusual circumstances, the central purpose of ATIS, Inc.'s review process is to ensure that the firm's clients understand both what and how their accounts are doing. An additional purpose is to ensure the suitability of ATIS, Inc. investment discipline for all clients.

Clients receive quarterly statements for each of their investment advisory accounts. Upon request, clients may receive reports more frequently, and may, in all cases, access comprehensive account information using our clearing firm's resources. Such reports are computer generated. ATIS, Inc. communicates with clients concerning their accounts, personal and financial circumstances.

ITEM 14 - Client Referrals and Other Compensation

We do not compensate for client referrals. There are no sales awards or other prizes.

Item 15 - Custody

We do not retain custody of client funds. We conduct business on a fully disclosed basis, pursuant to FINRA (k) (2) (ii) using RBC Capital Markets as our Clearing Firm. We also do business direct with mutual fund companies, with which we have sales agreements.

Item 16 - Investment Discretion

From time to time, a client may want the advisor to accept responsibility to purchase and sell securities on their behalf, through a limited trading authorization agreement. This agreement restricts the advisor from transferring securities or disbursing funds from the account. The sole purpose of the agreement is to allow the advisor to actively manage the account.

Item 17 - Voting Client Securities

We do not accept authority to vote a client's securities. Any voting material will be directly sent to the client by the respective transfer agent. Clients may call with any questions related to voting privileges.

Item 18 - Financial Information

We are not required to include a balance sheet in this Disclosure Document because we do not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance. We do not have any financial conditions that are reasonably likely to impair our ability to meet our contractual commitments to clients.

ATIS, Inc. has not been the subject of a bankruptcy petition during the past 10 years.

Item 19 - Requirements for State Registered Advisors

The ATIS, Inc. principal officers and management persons are the following:

John J. Evanich, President

john.evanich@atiswealth.com

John is President of ATIS, Inc. Investment Advisory Services, General Securities Principal and Financial Operations Principal. Previous to developing ATIS, Inc. in 2009, John served in the securities industry for 15 years, primarily as the President of American Trust Investment Services and Peerson & Co.

Before entering the securities industry, he was Controller of a financial institution, a member of a CPA firm, and examiner for the Indiana Department of Revenue.

A 1985 graduate from Indiana State University with a B.S. in accounting, John obtained his CPA license in 1987.

Kurt F. Schultz, Executive Vice President

kurt.schultz@atiswealth.com

Kurt is Executive Vice President of ATIS, Inc. Investment Advisory Services. He has 34 years of experience in the financial services industry including both equity and derivatives markets. As a former Senior Equity Derivatives Strategist, Kurt worked with institutional clients that included mutual fund managers, hedge funds, and various endowments. He also has extensive classroom and seminar experience teaching global corporations Technical Analysis and Risk Management strategies.

Since moving from the floor of Chicago's Exchanges to the private client arena, Kurt has expanded his licensing. His licenses include a Series 4,7,24,53,63, and 66. He also holds a Life, Variable Life, and Annuity License.

A 1983 graduate of Valparaiso University, Kurt obtained a B.A. in Economics.