

**Item 1 - Cover Page**

**Halbert Wealth Management, Inc.**

**11719 Bee Cave Road, Suite 200**

**Austin, TX 78738**

**800-348-3601**

**[www.halbertwealth.com](http://www.halbertwealth.com)**

**January 25, 2018**

This Brochure provides information about the qualifications and business practices of Halbert Wealth Management, Inc. If you have any questions about the contents of this Brochure, please contact us at 512-263-3800 or 800-348-3601. 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.

Halbert Wealth Management is a Registered Investment Advisor. Registration as an Investment Advisor does not imply any level of skill or training. The oral and written communications of an Advisor provide you with information about which you can determine to hire or retain an Advisor.

Additional information about Halbert Wealth Management is available on the SEC's website at [www.Advisorinfo.sec.gov](http://www.Advisorinfo.sec.gov).

## Item 2 – Material Changes

Since the last ADV Part 2, there have been several material changes made. These include:

- Modifications to the language to reflect that HWM no longer offers ARP. Halbert Investment Portfolios was also eliminated as a name that ARP and Select Portfolios were under. Select Portfolios is still available to clients.
- Language was added to reflect that the Firm now offers REITs and Interval Funds to clients.

Currently, our Brochure may be requested by contacting us at 512-263-3800 or [info@halbertwealth.com](mailto:info@halbertwealth.com). Our Brochure is also available on our website [www.halbertwealth.com](http://www.halbertwealth.com), also free of charge.

Additional information about Halbert Wealth is also available via the SEC's website [www.Advisorinfo.sec.gov](http://www.Advisorinfo.sec.gov). The SEC's website also provides information about any persons affiliated with Halbert Wealth who are registered, or are required to be registered, as Investment Advisor representatives of Halbert Wealth.

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#### **Item 4 – Advisory Business**

Halbert Wealth is an SEC registered Investment Advisory firm founded in 1995 by Gary and Debi Halbert. Halbert Wealth provides advisory services to clients in nearly all 50 states. Halbert Wealth is 100% owned by Gary D. Halbert.

Our primary business includes three programs, **AdvisorLink**, **Managed Strategies** and **Select Portfolios**. We focus on programs and strategies that feature active money management and some type of risk management. We also offer select individual mutual funds on a limited basis. Halbert Wealth’s advice is primarily limited to advice concerning the active management products it offers.

For **AdvisorLink**, Halbert Wealth researches and evaluates the performance of other Investment Advisors and Sub-Advisors and recommends or refers clients to the Investment Advisors. These Investment Advisors direct client assets into various mutual funds, including stock and bond funds, or they may invest directly in stocks, bonds, Exchange Traded Funds (“ETFs”), options and other securities. They use active management strategies, including tactical management and sector rotation strategies.

Halbert Wealth also offers **Managed Strategies**. This program invests clients in one or more active management strategies, limited partnerships, Business Development Companies (“BDC”), mutual funds, Interval Funds, REITs or other investments based on the needs and goals of the client. These are managed by one or more underlying Advisors, Sub-Advisors, General Partners or other money managers. A prospective client will be asked to complete a Confidential Investor Profile (the “Profile”) and provide other requested information which helps determine their suitability before investing in Managed Strategies. Unlike AdvisorLink where we recommend or refer clients to various strategies, with Managed Strategies we have discretion over a client account to add or replace strategies, partnerships, BDCs, Interval Funds, REITs, mutual funds or other investments as needed.

For both AdvisorLink and Managed Strategies, clients should refer to the ADV Part 2 or the offering materials for more information on the underlying Advisors, Sub-Advisors, General Partners or other money managers.

Halbert Wealth also offers **Select Portfolios**. This program invests clients in a portfolio comprised of allocations to various mutual funds, ETFs (equity securities that represent a basket of securities), ETNs (debt securities), active management strategies or other investments. A prospective client may be asked to complete a Confidential Investor Profile (the “Profile”) and provide other requested information which helps determine their suitability before investing in Select Portfolios. Like Managed Strategies, we have discretion to make changes to the client’s allocations.

The recommendation of programs is based on the individual needs of the clients depending on their financial goals and risk tolerance. The goal is to help the client select the program(s) that best meets their particular needs. Certain client restrictions may be placed on the programs or securities the client invests in, depending on the type of program, and any limitations the individual Investment Advisor managing the money may have. In Select Portfolios, Halbert Wealth selects investments from an approved list based on the perceived needs of the client. If a client invests in mutual funds, no restrictions are generally allowed at the fund level since mutual funds usually do not allow investors to put restrictions on their investments with them. However, a client can put restrictions on funds to be purchased. Limited partnerships, REITs and interval funds may also not allow investors to place restrictions on their investments.

Our assets under management are split between discretionary and non-discretionary assets. Select Portfolios and Managed Strategies accounts are considered discretionary accounts because Halbert Wealth directly manages client assets or selects one or more underlying Managers, Sub-Advisors, limited partnerships, BDCs interval funds, REITs, mutual funds or other investments to manage the assets. AdvisorLink accounts are considered non-discretionary accounts, because the client selects the strategies and third-party Investment Advisors to manage their assets, usually based on recommendations from us.

As of January 25, 2018, the approximate total assets under management are:

Discretionary	\$23,000,000
Non-Discretionary	\$109,000,000

## **Item 5 – Fees and Compensation**

### AdvisorLink

For our AdvisorLink programs, we are paid as a solicitor by sharing in a negotiated portion of the management fee charged by the actual Investment Advisors. The annual management fees are 1.75% to 2.50% on the assets under management. We refer and recommend to clients Investment Advisors that participate in the AdvisorLink program. The fees are generally non-negotiable, except in the case of large accounts or related accounts.

In most cases, the fees are deducted directly from client accounts. In some cases, clients may be able to arrange to be billed for their fees. The fees are deducted (or billed) on a quarterly basis. More details on this can be found in the information for each Investment Advisor.

Clients who invest in programs that invest assets directly in stocks, bonds, ETFs and other securities will also incur transaction costs and commissions related to the purchase and sale of those securities. Clients whose assets are invested directly in stocks, bonds, ETFs and other securities will establish an account at a brokerage firm designated by the Investment Advisor or Halbert Wealth. The terms and transaction costs related to investments made will be described by the brokerage agreement. With programs that invest in mutual funds, clients may also pay the investment advisory and other fees and commissions (including any "Rule 12b-1 fees") paid by these funds to their managers and other service providers (such as brokers). The fund's prospectus will describe all of the various fees, commissions and other expenses paid by the fund. (See Item 12 and the specific information for each Investment Advisor for more details.)

Some Investment Advisors charge fees in advance and some in arrears. To the extent that a client has paid any fees in advance and the account is subsequently terminated, the client will generally be entitled to a *pro rata* refund of the amount paid. The exact details of how this works, and how to get a refund of fees pre-paid for each program will be detailed in the client agreement with the Investment Advisor for that program.

### Select Portfolios

Halbert Wealth also offers Select Portfolios. This includes programs that assist clients with investing in a portfolio comprised of allocations to various mutual funds, ETFs and/or other investments. The fee Halbert Wealth charges for Select Portfolios is a percentage of assets under management, currently 1.25% for the first \$100,000, and then 1.0% for \$100,001 to \$1,000,000, and then 0.75% for any amount over \$1,000,000. In some cases, different fees may be negotiated for certain client accounts.

In most cases, the client fees are deducted directly from the client accounts. In some cases, clients may arrange to be billed for their fees. The fees are deducted (or billed) on a quarterly basis, in arrears for Select Portfolios.

Clients who invest will also incur transaction costs and commissions related to the purchase and sale of those securities. The terms and transaction costs related to investments will be described by the brokerage agreement. Clients also pay the Investment Advisory and other fees and commissions (including any "Rule 12b-1 fees") paid by these funds to their managers and other service providers (such as brokers). The relevant prospectus will describe all the various fees, commissions and other expenses. HWM may also receive from the advisor or distributor of a fund, compensation in the form of revenue-sharing payments, based on the amount of assets in the fund for particular mutual fund accounts.

## Managed Strategies

The fee Halbert Wealth charges for Managed Strategies is a percentage of assets under management, currently 1.25% for the first \$500,000, and then 1.0% for \$500,001 to \$2,000,000, and then negotiable for any amount over \$2,000,000. In some cases, different fees may be negotiated for certain client accounts.

In addition, fees for any underlying money manager(s) may be added to the HWM fee. These fees range from 0.30% to 1.25% and will be deducted from the client account on a quarterly basis. More details on the fees charged by each money manager can be found in the Addendum to the Managed Strategies Investment Advisory Agreement. For limited partnership investments, BDCs, interval funds, REITs and mutual funds, the HWM fees are deducted from the account or invoiced. There are also additional fees associated with limited partnerships, BDCs, REITs and Interval Funds that are outlined in the Private Placement Memorandums or Prospectus and are charged to partners or investors on a pro-rata basis. This is generally on a monthly basis.

In most cases, the HWM client fees and any underlying money manager fees are deducted directly from the client accounts. In some cases, clients may arrange to be billed for their fees. The fees are deducted (or billed) on a quarterly basis, in arrears.

Clients who invest will also incur transaction costs, annual holding fees and/or commissions related to the purchase and sale of those securities. The terms and transaction costs related to investments will be described by the brokerage agreement. Clients also pay the investment advisory and other fees and commissions (including any "Rule 12b-1 fees") paid by these funds to their managers and other service providers (such as brokers). The relevant Offering Memorandum or prospectus will describe all the various fees, commissions and other expenses.

## Other

For individual mutual funds that Halbert Wealth offers directly (not part of Select Portfolios or Managed Strategies), it will share in the management fee of the mutual fund. For example, if the Fund has a management fee of 1%, Halbert Wealth may share in that fee and receive .50%. This will not result in the investor in the mutual fund paying any additional fees. Investors will pay the normal fees and expenses for the mutual fund as outlined in the prospectus. There is no refund of fees when the mutual fund position is closed. Fees are not paid in advance and are generally not negotiable.

Item 12 further describes the factors that Halbert Wealth considers in selecting or recommending broker-dealers for client transactions and determining the reasonableness of their compensation (e.g., commissions).

## **Item 6 – Performance-Based Fees and Side-By-Side Management**

Halbert Wealth currently does not offer performance fee arrangements for its clients.

## **Item 7 – Types of Clients**

Halbert Wealth provides services primarily to individuals, high net worth individuals, IRAs and trusts. Halbert Wealth also may provide services to corporate pension and profit-sharing plans, charitable institutions, foundations and endowments. There are minimum account sizes starting at \$50,000 and going up to \$500,000, depending on the program in which the client wants to invest. The account minimums are often imposed by the Investment Advisor or other money manager and in some cases, are negotiable.

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

For AdvisorLink, we recommend and refer clients to other Investment Advisors or programs with trading signals provided by other Investment Advisors. Our investment strategy in AdvisorLink is more aptly called a research and evaluation strategy. Our ultimate goal is to find Investment Advisors with profitable, risk-adjusted performance records. We recommend and refer our clients to these Investment Advisors. The recommended Advisors use different strategies and different assets. Clients should look at the ADV Part 2 and other disclosure documents for each underlying Investment Advisor for more detailed information about methods and strategies used, and about the assets in which their strategies invest.

The risk of loss varies by strategy. Some of them trade more frequently, which can affect performance through increased brokerage or other transaction costs and may have tax implications, like wash sales, which should be considered. Others may use options, which have their own unique risks. Other programs attempt to increase returns by using strategies such as leverage or short trading. Other investments used by advisors have different risks. The ADV Part 2 for each of the advisors should be reviewed as they have more details about the strategies and the particular risks associated with each. All strategies offered have a risk of loss, some are more aggressive than others. Again, the ADV Part 2 for each strategy will provide more specific information regarding this. Clients should be able to bear the risk associated with each strategy invested in.

For Managed Strategies, the risks vary depending on the strategies used, ranging from moderate to aggressive. HWM reviews the client's financial information and determines if a client is suitable for a strategy or strategies and then invests their assets accordingly. Frequent trading can affect investment performance, especially through increased brokerage and other transaction costs. There may also be certain tax implications to consider, including wash sale issues and/or short-term gains in some cases, or UBTI or



other issues related to investing in limited partnerships. BDCs, REITs, interval funds and other alternative type investments. Clients should refer to the offering materials for each investment to learn more about the specific risks for the strategy.

The ZEGA HiPOS and ZBIG strategies, which is a sub-advisor that may be used in Managed Strategies, sells options which are complex securities that involve risks and are not suitable for everyone. Options trading can be speculative in nature and carry substantial risk of loss. In a “Black Swan” event, involving a rapid move in the market, losses could be very significant. While such events are not very common, and the strategy would have to be in the market and on the wrong side of the market, there is nonetheless the potential for significant losses. Some of the strategies are available with less exposure to options and therefore less risk. Clients should refer to ZEGA’s ADV Part 2 for more detailed information.

The Vida Longevity Fund, LP, is a Delaware limited partnership available to accredited investors formed to invest in a diversified portfolio of senior life settlements and other longevity-contingent assets with the goal of providing consistent returns, while attempting to preserve capital. There is a risk of loss for investors in the partnership. There is also a 2-year or 3-year lock-up period, depending on the class of shares purchased. Clients should refer to the Private Placement Memorandum for more detailed information.

The Ovation Partners Alternative Income Fund is a Delaware Limited Partnership available to accredited investors that was formed to invest in income-producing private credit and specialty finance assets with a goal of preserving capital while generating consistent returns. There is a risk of loss for investors in the partnership. There is a 2-year lock-up period. Clients should refer to the Private Placement Memorandum for more detailed information.

REITs and Interval Funds have risks as well. Real Estate prices can go up or down. There is also the risk of default on a mortgage or lease. Clients should review the offering materials for more details about the particular risks involved.

For Select Portfolios, we research and evaluate mutual funds, ETFs and/or other investments to determine which ones to include in our program based on their past track record, trading strategy, ongoing management strategies, among other factors. For the individual mutual funds we recommend, we analyze the fund’s track record, trading strategy and ongoing management strategies. All the programs and investments offered by Halbert Wealth involve risk of loss that clients should be prepared to bear before deciding to invest.

Select Portfolios is generally a moderate to aggressive risk program. The risks are those associated with the combination of mutual funds, ETFs and/or other investments selected for the program. For Select Portfolios, a combination of mutual funds, ETFs and/or other

investments is selected based on their past track record and the strategy they use to manage their funds. Investments selected are generally those with active management strategies, though there is no guarantee they will succeed.

Also, frequent trading can produce unfavorable tax consequences. The combinations selected are based on their past track records, the strategy used to manage their funds and/or how a group of investments may work well together over time.

For mutual funds offered by Halbert Wealth, the investment strategy used by the manager would be one of the primary considerations reviewed in determining whether to recommend a fund. The risk level would vary from fund to fund, but risk management would be an important factor in determining whether to recommend a fund. The prospectus for the fund has more information concerning this.

Select Portfolios risks are those associated with the combination of mutual funds, ETFs and/or other investments selected for the program, some of which are not actively managed. Also, frequent trading can produce unfavorable tax consequences. The combinations selected are based on their past track records, the strategy used to manage their funds and/or how a group of investments may work well together over time.

#### **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 your evaluation of Halbert Wealth or the integrity of Halbert Wealth's management. Halbert Wealth does not believe there is any material information to disclose that is applicable to this Item.

#### **Item 10 – Other Financial Industry Activities and Affiliations**

Since AdvisorLink recommends other Investment Advisors to our clients and we receive compensation from those Advisors for making the recommendation, or charge a management fee for some programs, there is a potential conflict of interest in that Halbert Wealth may only recommend those Investment Advisors for which it has an arrangement to receive a share of the compensation or management fee, or programs in which we charge our own management fee. There may be other Investment Advisors available. However, it is also important to note that those Investment Advisors offered by Halbert Wealth have all completed a detailed due diligence review before they are recommended. This thereby minimizes the conflict of interest in that only programs that meet Halbert Wealth's due diligence requirements are recommended to clients.

The Investment Consultants do not receive commissions, so they have no incentive to recommend one program over another based on the amount of the fees charged by the different advisors, and compensation received by the Firm.

## **Item 11 – Code of Ethics**

Halbert Wealth has adopted a Code of Ethics for all supervised persons describing its high standard of business conduct and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, as well as personal securities trading procedures, among other things. All supervised persons at Halbert Wealth must acknowledge the terms of the Code of Ethics annually, or as amended. A copy of the Code of Ethics is available to any client or prospective client upon request.

In addition, our officers, directors, employees or affiliates may, from time to time, invest their own assets with the same Investment Advisors, mutual funds, limited partnerships, REITs, interval funds or other securities in which our clients' assets may have been invested. As part of our due diligence examination of prospective investments or strategies, one or more of our officers usually invests their own assets under the management of our recommended strategies and investments. It permits Halbert Wealth to closely monitor performance and trading and/or management techniques. These investments are generally made prior to offering them to clients. We do not believe that these investments create a serious conflict of interest with our clients, unless an Investment Advisor or investment sets limits on the amount of additional assets it will accept for management. In the unlikely event such limits are set, our clients will be given priority to invest.

In addition, in AdvisorLink most of the Investment Advisors use mutual funds which are only traded once or twice per day. Some may trade ETFs or individual bonds. Options may be used. However, the trades are selected and made by the Investment Advisor or a Sub-Advisor, and not by Halbert Wealth. Employees of Halbert Wealth are generally not aware of the trades until after they have been completed. For limited partnerships, BDCs, REITs and Interval Funds, employees of Halbert Wealth do not have access to advance information about trades. For Select Portfolios, we do have access to advance information regarding the trading of the particular investment being purchased or sold for the account.

We have instituted procedures for monitoring securities transactions of our associated persons, which include a quarterly review of reports of personal securities transactions effected by our associated persons and their immediate families during the preceding quarter. In addition, if an associated person maintains a securities trading account at another broker-dealer that is directly managed by the employee, the other broker-dealer will provide a copy of the employee's statement to a manager who reviews it for compliance purposes.

The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of Halbert Wealth will not interfere with (i) making

decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code, certain classes of securities have been designated as exempt transactions, based upon a determination that these would likely not interfere with the best interest of Halbert Wealth's clients. In addition, the Code requires pre-clearance of some transactions, and restricts trading in close proximity to client trading activity. It is possible, in some circumstances, that employees may invest in the same securities as clients; therefore, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is monitored under the Code of Ethics to reasonably prevent conflicts of interest between Halbert Wealth and its clients.

Halbert Wealth's clients or prospective clients may request a copy of its Code of Ethics by contacting us at 512-263-3800, or by e-mail at [clientservice@halbertwealth.com](mailto:clientservice@halbertwealth.com).

### **Item 12 – Brokerage Practices**

For our AdvisorLink programs, Halbert Wealth does not always select the broker/dealer used for custody and trading. The Investment Advisor selected by the client makes that decision in most cases. There may be certain conflicts of interests involved in their selection, and there may be benefits considered "soft dollars" that they receive. You should review the particular Investment Advisors' ADV Part 2 and other disclosure documents for more complete details regarding their conflicts of interest.

For AdvisorLink programs where Halbert Wealth does select the broker/dealer used for custody and trading, there may be soft dollar benefits Halbert Wealth receives. These may include duplicate client statements and confirmations, downloads of client information, research materials, access to their trading desk and the ability to deduct client fees from the client accounts. This benefits Halbert Wealth since it does not have to pay for these services, and thus we may have an incentive to recommend the broker/dealer based on the benefits we receive. This may cause a conflict with the clients' interest of receiving the most favorable execution. While we endeavor to put the clients' interests first, there could be potential conflicts of interest because of these benefits. There may be other broker/dealers available at lower costs.

For our Managed Strategies, Select Portfolios and the individual mutual funds offered by Halbert Wealth, we select the broker/dealer, which is currently TD Ameritrade. Halbert Wealth receives soft dollar benefits from TD Ameritrade, including duplicate client statements and confirmations, downloads of client information, research materials, access to their trading desk, and the ability to deduct client fees from the client accounts. This benefits Halbert Wealth since it does not have to pay for these services, and thus we may have an incentive to recommend TD Ameritrade based on the benefits we receive. This may

cause a conflict with the clients' interest of receiving the most favorable execution. While we endeavor to put the clients' interests first, there could be potential conflicts of interest because of these benefits. Also, there may be other broker/dealers available at lower costs. Jefferson National Life may be used for annuity accounts.

### **Item 13 – Review of Accounts**

For our AdvisorLink programs, we review accounts annually with the client by sending them a letter showing their allocation to the program, the risk level, and asking them to contact us if their financial condition has changed, or they feel the program may no longer be appropriate for them. If there have been any material changes, an Investment Consultant may contact the client to conduct a more thorough review.

For Managed Strategies, account reviews are generally done annually. A letter is sent to the client annually showing their allocation to the program and the risk level, and asking them to contact us if their financial condition has changed or if they feel the program is no longer appropriate for them. They may be done more frequently if we receive notification that the client's financial condition has changed. If there have been any material changes, an Investment Consultant may contact the client to conduct a more thorough review.

For Select Portfolios, the accounts are generally reviewed annually. If there is a need to re-balance the accounts, it may be done at this time. The clients in these programs are also sent a letter showing their allocation to this program, the risk level and asking them to contact us if their financial condition has changed, or they feel the program is no longer appropriate. If there have been any material changes, an Investment Consultant may contact the client to conduct a more thorough review.

Clients of Halbert Wealth receive statements from the custodian for their investments. Halbert Wealth also sends out quarterly consolidated statements for clients with multiple investments with the Firm. These written reports should be compared to the custodian statements, and any inconsistencies should be reported to us.

### **Item 14 – Client Referrals and Other Compensation**

In some of our AdvisorLink programs, we receive compensation from outside Investment Advisors for referring clients to them. Generally, we share in the management fee they charge clients, with Halbert Wealth normally receiving 40-60% of the total fee. The exact nature of the arrangement is described in the Solicitor's Written Disclosure Statement that the client receives before investing in each program.

There is a conflict of interest in that Halbert Wealth only refers clients to programs that have completed a favorable due diligence review, and with which it has an arrangement to receive a portion of the management fees. There may be other programs available that the

Firm has not reviewed and does not recommend. The compensation received by Halbert Wealth is different for different programs, and therefore there could be a conflict of interest for recommending one program over another. However, Halbert Wealth puts the best interest of the client first, without consideration of the compensation received by Halbert Wealth.

Halbert Wealth may also share in the management fee for certain mutual funds it recommends. Up to 50% of the management fee may be shared with Halbert Wealth. Since Halbert Wealth only recommends a select group of funds for which it is compensated, there is a conflict of interest in that there are other funds available that Halbert Wealth does not recommend.

### **Item 15 - Custody**

Clients should receive at least quarterly statements from the broker or other qualified custodian that holds and maintains investment assets. Halbert Wealth urges clients to carefully review such statements and compare such official custodial records to the account statements that we may provide to them.

We send statements to our clients quarterly. Our statements may vary from custodial statements based on accounting procedures, reporting dates or valuation methodologies of certain securities. If clients have any questions about any discrepancies, they should notify us as soon as possible.

Clients are urged to compare statements they receive from custodians with statements they receive from HWM. Any questions about discrepancies should be brought to the attention of HWM.

### **Item 16 - Investment Discretion**

In our AdvisorLink programs, we do not have discretionary authority over client account(s). The Investment Advisor or signal provider for the specific program selected by the client has discretionary authority. The client must authorize any change from one program to another. Halbert Wealth does not have discretion to make those changes without client approval.

For Managed Strategies, we do have discretionary authority to determine active management strategies, limited partnerships, BDCs or other investments that are selected for clients' accounts and to make changes to the allocations as needed. The selection of strategies is based on the needs of the client. Client restrictions may be allowed in some cases. Clients execute TD Ameritrade account paperwork in order to grant the one or more underlying Managers or Sub-Advisors authority to trade the account.

For Select Portfolios, we do have discretionary authority to determine which mutual funds, ETFs, and/or other investments to invest in the clients' accounts. Clients are generally invested in a selection of investments that is customized based on the needs of the client. Client restrictions may be allowed in some cases. Clients execute TD Ameritrade account paperwork in order to grant Halbert Wealth authority to trade the account.

### **Item 17 – Voting Client Securities**

As a matter of policy and practice, Halbert Wealth does not have any authority to and does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for all securities maintained in client portfolios. Halbert Wealth may provide advice to clients regarding the clients' voting of proxies. Third party Investment Advisors in AdvisorLink that Halbert Wealth recommends have their own Voting Client Securities policies which clients should read before they invest with the Investment Advisors to fully understand their specific policies.

Clients invested in mutual funds are responsible for any matters requiring a vote. Halbert Wealth does not vote any proxies. Clients will receive their proxies or other solicitations directly from their custodian or transfer agent. Clients may contact Halbert Wealth with questions about a particular solicitation.

### **Item 18 – Financial Information**

Registered Investment Advisors are required in this Item to provide you with certain financial information or disclosures about Halbert Wealth's financial condition. Halbert Wealth 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.

## **ADV Part 2 – Brochure Supplements**

### **Item 1 – Cover Page for Gary D. Halbert**

Halbert Wealth Management, Inc. 800-348-3601

11719 Bee Cave Road, Suite 200

As of: January 25, 2018

Austin, TX 78738

This Brochure provides information about Gary D. Halbert that supplements the Halbert Wealth Management brochure. You should have received a copy of that brochure. Please contact Client Service at 512-263-3800 or by e-mail at [clientservice@halbertwealth.com](mailto:clientservice@halbertwealth.com) if you did not receive Halbert Wealth Management's brochure or if you have any comments about the content of this supplement.

Additional information about Gary D. Halbert is available on the SEC's website at [www.Advisorinfo.sec.gov](http://www.Advisorinfo.sec.gov).

### **Item 2 – Educational Background and Business Experience**

Gary Halbert, born in 1952, organized our firm and serves as its President. He holds a Bachelor of Science degree (Science, 1974) from Texas Tech University and a Masters of Business Administration degree (Economics, 1975) from American Graduate School. He founded Halbert Wealth Management in 1995 and has been active in the securities and investment business for over 30 years.

### **Item 3 – Disciplinary Information**

There is no material disciplinary information to report.

### **Item 4 – Other Business Activities**

Mr. Halbert organized ProFutures, Inc. ("PF"), a registered CFTC and NFA commodity pool operator, in 1984 and serves as President and Director of the entity. As of December 31, 2015, PF is no longer registered with the CFTC or NFA.

This other business is a related entity of Halbert Wealth and is under common ownership. Gary Halbert devotes minimal time to this other entity.

### **Item 5 – Additional Compensation**

Gary Halbert is paid a salary for his work at the Firm. He is the sole owner of Halbert Wealth Management, which is an S-Corporation.



## Item 6 – Supervision

Gary Halbert is the President and CEO of the Firm. As the chief executive of the Firm, there is no one above him in the organizational chart to directly supervise his advisory activities. However, questions concerning Gary can be directed to Debi Halbert (telephone number 512-263-3800). There are also procedures in place to supervise the advisory activities of all persons at the Firm, including Gary Halbert. These include a review of all correspondence (written and e-mail) to clients or potential clients. All marketing materials used by the Firm are reviewed before they are approved for use. The Firm's Chief Compliance Officer is responsible for the review of these materials.

## **Item 1 – Cover Page for Debi B. Halbert**

Halbert Wealth Management, Inc. 800-348-3601

11719 Bee Cave Road, Suite 200

As of: January 25, 2018

Austin, TX 78738

This Brochure provides information about Debi Halbert that supplements the Halbert Wealth Management brochure. You should have received a copy of that brochure. Please contact Client Service at 512-263-3800 or by e-mail at [clientservice@halbertwealth.com](mailto:clientservice@halbertwealth.com) if you did not receive Halbert Wealth Management's brochure or if you have any comments about the content of this supplement.

Additional information about Debi Halbert is available on the SEC's website at [www.Advisorinfo.sec.gov](http://www.Advisorinfo.sec.gov).

## Item 2 – Educational Background and Business Experience

Debi Halbert was born in 1955, helped organize the firm and serves as Secretary/Treasurer. She attended Richland College. She co-founded Halbert Wealth Management in 1995 and has been active in the securities business for over 30 years.

## Item 3 – Disciplinary Information

There is no material disciplinary information to report.

## Item 4 – Other Business Activities

Debi Halbert helped organize ProFutures, Inc. ("PF"), a registered CFTC and NFA commodity pool operator, in 1984 and serves as Secretary/Treasurer of the entity. As of December 31, 2015, PF is no longer registered with the CFTC or NFA.

This other business is a related entity of Halbert Wealth and is under common ownership. Debi Halbert devotes minimal time to this other entity.

#### Item 5 – Additional Compensation

Debi Halbert is paid a salary for her work at the Firm.

#### Item 6 – Supervision

Debi Halbert is the Secretary/Treasurer of the Firm. She is supervised by Gary Halbert (telephone number 512-263-3800). There are also procedures in place to supervise the advisory activities of all persons at the Firm. These include a review of all correspondence (written and e-mail) to clients or potential clients. All marketing materials used by the Firm are reviewed before they are approved for use. The Firm's Chief Compliance Officer is responsible for the review of these materials.

#### **Item 1 – Cover Page for Phillip Denney**

Halbert Wealth Management, Inc. 800-348-3601

11719 Bee Cave Road, Suite 200

As of: January 25, 2018

Austin, TX 78738

This Brochure provides information about Phil Denney that supplements the Halbert Wealth Management brochure. You should have received a copy of that brochure. Please contact Client Service at 512-263-3800 or by e-mail at [clientservice@halbertwealth.com](mailto:clientservice@halbertwealth.com) if you did not receive Halbert Wealth Management's brochure or if you have any comments about the content of this supplement.

Additional information about Phil Denney is available on the SEC's website at [www.Advisorinfo.sec.gov](http://www.Advisorinfo.sec.gov).

#### Item 2 – Educational Background and Business Experience

Phil Denney, born in 1953, holds a Bachelor of Arts in Political Science from The University of Akron, and a Masters of Business Administration from St. Edwards University. He joined the Firm in October 1999, and serves as an Investment Consultant and Vice President.

Phil is a Certified Financial Planner ("CFP®"). To obtain the CFP® designation, professionals must complete a comprehensive course of study at a college or university offering a financial planning curriculum approved by the CFP Board. Professionals must also pass a comprehensive two-day, 10-hour CFP Certification Examination that covers the

financial planning process, tax planning, employee benefits and retirement planning, estate planning, investment management and insurance.

### Item 3 – Disciplinary Information

There is no disciplinary information to report.

### Item 4 – Other Business Activities

Phil Denney is Vice President of ProFutures, Inc. ("PF"), was registered CFTC and NFA commodity pool operator. As of December 31, 2015, PF is no longer registered with the CFTC or NFA.

This other business is a related entity of Halbert Wealth as is under common ownership. Phil Denney devotes very little of his time to this other entity.

### Item 5 – Additional Compensation

Phil Denney is paid a salary for his work at the Firm. He may also receive bonus pay based on the overall performance of the Firm.

### Item 6 – Supervision

Phil Denney's advisory activities are supervised by Debi Halbert, a Manager of the Firm (telephone number 512-263-3800). There are also procedures in place to supervise the advisory activities of all persons at the Firm. These include a review of all correspondence (written and e-mail) to clients or potential clients. All marketing materials used by the Firm are reviewed before they are approved for use. The Firm's Chief Compliance Officer is responsible for the review of these materials.

### **Item 1 – Cover Page for Spencer Wright**

Halbert Wealth Management, Inc. 800-348-3601

11719 Bee Cave Road, Suite 200

As of: January 25, 2018

Austin, TX 78738

This Brochure provides information about Spencer Wright that supplements the Halbert Wealth Management brochure. You should have received a copy of that brochure. Please contact Client Service at 512-263-3800 or by e-mail at [clientservice@halbertwealth.com](mailto:clientservice@halbertwealth.com). you did not receive Halbert Wealth Management's brochure or if you have any comments about the content of this supplement.

Additional information about Spencer Wright is available on the SEC's website at [www.Advisorinfo.sec.gov](http://www.Advisorinfo.sec.gov).

#### Item 2 – Educational Background and Business Experience

Spencer Wright, born in 1969, attended Texas State University (formerly Southwest Texas State University) and Rutherford College at the University of Kent. He joined Halbert Wealth Management in October 1999 where he serves as an Investment Consultant.

#### Item 3 – Disciplinary Information

There is no disciplinary information to report.

#### Item 4 – Other Business Activities

None

#### Item 5 – Additional Compensation

Spencer Wright is paid a salary for his work at the Firm. He may also receive bonus pay based on the overall performance of the Firm.

#### Item 6 – Supervision

Spencer Wright's advisory activities are supervised by Debi Halbert, a Manager of the Firm (telephone number 512-263-3800). There are also procedures in place to supervise the advisory activities of all persons at the Firm. These include a review of all correspondence (written and e-mail) to clients or potential clients. All marketing materials used by the Firm are reviewed before they are approved for use. The Firm's Chief Compliance Officer is responsible for the review of these materials.

## Notice of Privacy Practices

We consider it our great privilege to serve your financial needs. We have always been committed to maintaining customer confidentiality. As we serve your financial relationship, we are committed to safeguarding customer information and take this opportunity to clarify our privacy practices.

The privacy policies described in this notice apply to individuals who obtain or apply for a financial product or service, or have done so in the past and are a customer of Halbert Wealth Management.

As part of our business, we obtain certain “non-public personal financial information” about you, which for ease of reading we will refer to as “information” in this notice. This includes information such as your social security number, net income, etc., which we receive from you on applications, investment advisory contracts or from other forms, as well as information concerning your transactions with us.

- We do not disclose this information about you or any former customers with any non-affiliated third parties, except as required to process transactions, service your account, comply with regulators and accountants, or as required by law.
- We do not sell or otherwise share this information with third-parties.
- We restrict access to the information to authorized individuals who need to know this information to provide service and products to you.
- We maintain physical, electronic and procedural safeguards to protect the confidentiality of your information.
- Your information may be shared with our affiliates, which are money management companies and other financial service providers.

**You do not need to call or do anything as a result of this notice.** It is meant to inform you of how we safeguard your non-public personal financial information. You may wish to file this notice with your papers. We reserve the right to change this policy as needed. You can contact us at 800-348-3601 for the latest Policy or you can view it on our website - [www.halbertwealth.com](http://www.halbertwealth.com).

Thank you for the opportunity to serve you. Your relationship and trust are very important to us.