

Part 2A of Form ADV

For

Rayburn West Financial Services, LLC

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This brochure provides information about the qualifications and business practices of Rayburn West Financial Services, LLC. If you have any questions about the contents of this brochure, please contact us at 615.386.6932. This information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state authority.

Item 2: Material Changes

The material changes in this brochure from the last annual updating amendment of Rayburn West Financial Services, LLC on 03/12/2024 are described below. Material changes relate to Rayburn West Financial Services, LLC's policies, practices or conflicts of interests.

- Rayburn West Financial Services, LLC is no longer associated a broker dealer. (Items 4, 5 and 9)
- Charles R. West is no longer an insurance agent. (Item 10)

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Item 4: Advisory Services

Rayburn West Financial Services, LLC began conducting business on July 1, 2007. Charles R. West Jr. (Ray) is the founding member and principal owner. Rayburn West Financial Services, LLC offers the following services:

Fee Based Asset Management Estate
and Financial Planning Education
and Funding Planning Life and
Risk Management – Hedge portfolios by the use of puts and calls to
manage risk.

Rayburn West Financial Services, LLC actively manages investment advisory accounts based on the client's individual financial and personal needs, investment objectives, time horizon, and risk tolerance. All accounts are separate and Rayburn West Financial Services, LLC does not execute aggregate trades.

Rayburn West Financial Services, LLC held \$154,516,059.00 in assets under management as of December 31, 2023, of which \$98,676,969.00 was discretionary and \$55,839,090.00 was non-discretionary. Clients can impose restrictions on any specific security by written request and approval of the firm.

Item 5: Fees and Compensation

Rayburn West Financial Services, LLC deducts fees in advance on a quarterly basis for all advisory accounts.

Fees – The standard annual advisory account fee is:

\$0 -	49,000 - 1.50%
50,000 -	249,000- 1.25%
250,000-	499,000- 1.15%
500,000-	749,000- 1.10%
750,000-	999,000- 1.05%
1,000,000-	2,000,000 - 1.0%
2,000,000 +	= negotiated on per case basis

Rayburn West Financial Services, LLC or client upon 30 day written notice can terminate the Investment Advisory Agreement. Otherwise, such agreements automatically renew annually.

Clients' accounts that are closed during the quarter are subject to a partial reimbursement of the investment advisory quarterly fee based on the month the account has a zero balance.

Clients also incur transaction costs with some products. Custodians of clients' assets do not generally charge separately for custody. Custodians are compensated by account holders through commissions or other transaction-fees for securities trades that are executed through the custodian or that settle into the custodian's accounts.

Item 6: Performance-based Fees and Side by Side Management

Not Applicable

Item 7: Types of Clients

Rayburn West Financial Services, LLC advises primarily:

- *Individuals
- *Pension and Profit Sharing plans
- * Trusts and estates
- * Corporations or business entities

Item 8: Methods of Analysis, Sources of Information, and Investment Strategies

Rayburn West Financial Services, LLC uses the following methods to analyze securities: charting, technical, fundamental, and cyclical analysis.

Rayburn West Financial Services, LLC uses the following sources of information:

- Inspection of corporate activities
- Research material
- Annual reports, prospectuses, and filings with the Securities and Exchange Commission

The investment strategy at Rayburn West Financial Services, LLC is to buy undervalued assets and hold them until they are fully valued. We use hedges such as puts and calls to help minimize the risk of each investment. All investments bear some type of risk, including, but not limited to inflation, currency, timing, or natural disaster. We do not normally engage in the frequent trading of assets. Rayburn West Financial Services, LLC has no control of how long it will take an investment to become fully valued.

Item 9: Disciplinary Information

Not Applicable.

Item 10: Other Financial Industry Activities and Affiliation

Charles Schwab Institutional, a division of Charles Schwab & Co, is the custodian for all investment advisory accounts.

Rayburn West Financial Services, LLC does not participate in IPOS and does not have any soft dollar arrangements with any other firms.

Item 11: Code of Ethics, Participation in Client Transactions and Personal Trading

Rayburn West Financial Services, LLC owes its clients the highest duty of loyalty. The interests of our clients come before the interest of Rayburn West Financial Services, LLC or any employee. Each employee's professional and personal investment activities must be consistent with our Code of Ethics and avoid any potential conflict of interests.

Adviser and employees of Rayburn West Financial Services, LLC may purchase for their own personal investment accounts, the same securities that may be recommended to clients. Rayburn West Financial Services, LLC has adopted a written Code of Ethics to address and avoid potential conflicts of interest as required as required by Rule 204A-1 under the Investment Act of 1940. This rule requires that Rayburn West Financial Services, LLC adopt a Code that sets forth a standard of business conduct and requires compliance with federal securities laws by all employees. Our Code contains policies and procedures that insure all personal securities trading by employees avoid actual or potential conflicts of interest or any abuse of individual's position of trust and responsibility. A copy of the Code of Ethics of Rayburn West Financial Services, LLC is available upon request.

Item 12: Brokerage Practices

Rayburn West Financial Services, LLC has no soft dollars arrangements with any other firm.

Custodians/broker-dealers will be recommended based on Rayburn West Financial Services, LLC's duty to seek "best execution," which is the obligation to seek to execute securities transactions for a client on terms that are the most favorable to the client under the circumstances. The client will not necessarily pay the lowest commission or commission equivalent, and Rayburn West Financial Services, LLC may also consider the market expertise and research access provided by the payment of commissions, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers to aid in the research efforts of Rayburn West Financial Services, LLC. Rayburn West Financial Services, LLC will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian.

Rayburn West Financial Services, LLC uses Charles Schwab Institutional division of Charles Schwab & Co to act as custodian of assets and to execute trades for our fee based investment advisory accounts.

We review the other firms annually to make sure that we are getting the best service and execution of trades.

Each client has an individual account number and all accounts are traded separately. No trade orders are aggregated.

Item 13: Review of Accounts

Rayburn West Financial Services, LLC reviews all accounts on a quarterly basis. All accounts receive monthly statements from the custodian of their accounts. The goal at Rayburn West Financial Services, LLC is to conduct an in person client review on an annual basis depending on the availability and schedule of the client. No fee is charged for the annual review. The review is to make sure that clients communicate any changes over the past year or any anticipated changes in the coming year.

Item 14: Client Referrals and Other Compensation

Rayburn West Financial Services, LLC does not give any financial compensation for client referrals nor do we have any revenue sharing arrangements with any Certified Public Accountants, Attorneys, or other Entities.

Charles Schwab & Co., Inc. Advisor Services provides Rayburn West Financial Services, LLC with access to Charles Schwab & Co., Inc. Advisor Services' institutional trading and custody services, which are typically not available to Charles Schwab & Co., Inc. Advisor Services retail investors. These services generally are available to independent investment advisers on an unsolicited basis, at no charge to them so long as a total of at least \$10 million of the adviser's clients' assets are maintained in accounts at Charles Schwab & Co., Inc. Advisor Services. Charles Schwab & Co., Inc. Advisor Services includes brokerage services that are related to the execution of securities transactions, custody, research, including that in the form of advice, analyses and reports, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment. For Rayburn West Financial Services, LLC client accounts maintained in its custody, Charles Schwab & Co., Inc. Advisor Services generally does not charge separately for custody services but is compensated by account holders through commissions or other transaction-related or asset-based fees for securities trades that are executed through Charles Schwab & Co., Inc. Advisor Services or that settle into Charles Schwab & Co., Inc. Advisor Services accounts.

Charles Schwab & Co., Inc. Advisor Services also makes available to Rayburn West Financial Services, LLC other products and services that benefit Rayburn West Financial Services, LLC but may not benefit its clients' accounts. These benefits may include national, regional or Rayburn West Financial Services, LLC specific educational events organized and/or sponsored by Charles Schwab & Co., Inc. Advisor Services. Other potential benefits may include occasional business entertainment of personnel of Rayburn West Financial Services, LLC by Charles Schwab & Co., Inc. Advisor Services personnel, including meals, invitations to sporting events, including golf tournaments, and other forms of entertainment, some of which may accompany educational opportunities. Other

of these products and services assist Rayburn West Financial Services, LLC in managing and administering clients' accounts. These include software and other technology (and related technological training) that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts, if applicable), provide research, pricing information and other market data, facilitate payment of Rayburn West Financial Services, LLC's fees from its clients' accounts (if applicable), and assist with back-office training and support functions, recordkeeping and client reporting. Many of these services generally may be used to service all or some substantial number of Rayburn West Financial Services, LLC's accounts. Charles Schwab & Co., Inc. Advisor Services also makes available to Rayburn West Financial Services, LLC other services intended to help Rayburn West Financial Services, LLC manage and further develop its business enterprise. These services may include professional compliance, legal and business consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, employee benefits providers, and human capital consultants, insurance and marketing. In addition, Charles Schwab & Co., Inc. Advisor Services may make available, arrange and/or pay vendors for these types of services rendered to Rayburn West Financial Services, LLC by independent third parties. Charles Schwab & Co., Inc. Advisor Services may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to Rayburn West Financial Services, LLC. Rayburn West Financial Services, LLC is independently owned and operated and not affiliated with Charles Schwab & Co., Inc. Advisor Services.

Item 15: Custody

Not applicable

Item 16: Investment Discretion

Rayburn West Financial Services, LLC has discretionary authority for trading and disbursement for all investment advisory accounts excluding retirement plans and 401K plans. Clients grant discretionary authority to Rayburn West Financial Services, LLC through execution of the Agreement of Investment Management Services. When a client agrees to discretionary authority, the Adviser will be responsible for asset allocation. Clients can impose restrictions on any specific security by written request and approval of the firm.

Item 17: Voting Client Securities

Rayburn West Financial Services, LLC does not vote for clients' securities at this time. Clients have the choice to direct their own votes due to each investment advisory account being

individually managed. Each client can choose to have proxies sent to their mailing address. The proxies are mailed to the client from the custodian, not Rayburn West Financial Services, LLC. Any client is welcome to call and discuss the merits of each vote and how it will impact their investment account.

Item 18: Financial Information

Not Applicable