



WESTBOURNE
INVESTMENTS

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03/13/2024

Part 2A of Form ADV: Firm Brochure

This brochure provides information about the qualifications and business practices of Westbourne Investments, Inc. (**WESTBOURNE**) and Ariba Asset Management (**ARIBA**), a division of Westbourne Investments, Inc. Founded in 1991, Westbourne has been acquired by Ariba Asset Management shareholders. If you have any questions about the contents of this brochure, please contact us at (703) 294-6880 or pwalsh@westbourneinv.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 Westbourne Investments, Inc. also is available on the SEC's website at www.adviserinfo.sec.gov.

Material Changes

Annual Update

The material changes section of this brochure will be updated annually when material changes occur since the previous release of the Firm Brochure.

Material Changes since the Last Update

No material changes since the last update.

WESTBOURNE's ADV Part 2 was last updated on March 7, 2023.

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Advisory Business

Firm Description & Principal Owners

Westbourne Investments, Inc. (**WESTBOURNE**) provides independent, customized account management for individuals and institutions. Our firm specializes in providing highly personal management of our client's assets. Stock and bond portfolios are designed and managed in strict accordance with each client's individual investment objectives. Discretionary authority is limited by the objectives of the account, the applicable fiduciary obligations imposed by the law and the assets contained in the account. **WESTBOURNE** was founded in 1990 and is principally owned by Robert Long and Patrick Walsh.

Types of Advisory Services

WESTBOURNE offers a number of different types of advisory services.

- **Personal Financial Planning**

This service includes a discussion and written analysis of an individual or family's current financial condition, including current and expected income sources from salary, social security, pensions, or other sources; estimated monthly expenses; risk protection in place via life, disability, long-term care, and other relevant insurance policies. It also includes recommendations, implementation, and monitoring of an asset allocation plan based on the investor's financial goals, as well as the individual's ability, willingness and need to take risk, as determined by time horizon, stability of earned income, need for liquidity, and the investor's available options for liquidity should their investment plan fail. An investor's available options may include delaying retirement, taking a part-time job, downsizing the current home, selling a second home, lowering consumption, or moving to a region with a lower cost of living. The more options, the more risk one can take.

- **Diversified equity and balanced portfolio management**

Managed portfolios are structured with Exchange Traded Funds (ETFs) and/or individual stocks that represent the following investment categories:

- *Income-oriented* equities are selected for their relatively consistent ability to produce noticeably superior rising income streams from basic industry sectors of the economy represented by real estate, energy production and delivery, select utilities, entertainment, and financial services.
- *Core* equities are comprised of 15-to-20-year old companies, characterized by strong, innovative managements, excellent balance sheets, demonstrated pricing power, earnings growth consistency and predictability, proprietary markets or product ranking one or two in their respective industry niche, and possessing a shareholder motivated management.
- *Growth* equities represent a category comprised of ably-managed younger versions of the core group, with dynamic new products or services that address, rapidly expanding, new markets and societal needs, and possess all, or most, of the financial attributes and metrics of the older core companies.

- **ETF portfolio management**

WESTBOURNE develops a strategic asset allocation plan based on the client's risk tolerance, investment return objectives, investment time horizon, income requirements and other factors. The target investment portfolio for the client is usually divided among equity, fixed income, and alternative investments. The asset allocation model further identifies investment asset classes within these broad categories, such as short and intermediate-term U.S. and global bonds, U.S. large and small company growth and value stocks, international large company and small company growth and value stocks, real estate investment trusts, publicly traded Master Limited Partnerships, precious metals, and money market securities. **WESTBOURNE** invests in selected common stock funds including Exchange Traded Funds (ETFs) that track these asset classes, periodically rebalancing to the target allocation while considering the impact of taxes and transaction costs. Investors in ETF portfolios should expect to remain fully invested in their selected asset allocation plan at all times.

- **Options**

WESTBOURNE employs various strategies in line with the clients' agreed upon strategies.

- *Covered Calls Strategy*
Selling call options on equities long in accounts, using strike prices above purchase prices and using time/value analysis to achieve enhanced cashflow(income).
- *Synthetic Longs Strategy*
Selling put options, below the market price to provide the opportunity to purchase equities at lower levels, also used in conjunction with "covered calls" to create spreads. Also used with the purchase of long calls, to acquire participation in positive equity appreciation.
- *Long Puts Strategy*
To provide a measure of insurance against sudden, volatile stock value declines
- *Long Call Strategy*
Buying call options
- *Advanced Options Strategy*
Vertical & Butterfly options spreads
- Options Strategies within the approved risk levels of option trading(zero to three) could employ all of the above outlined strategies. All clients receive the custodian's "option risk brochure."
- *Monitoring*
Option positions are monitored daily and chronological records are kept to evaluate future decisions by the investment committee.

- **Concierge Services and Special Projects**

Projects may be undertaken that are not described in other types of agreements, including assistance with tax planning, cost basis calculations, generating specialized reports, or other services specifically described in an advisory agreement.

Tailored Relationships

Portfolios are managed according to the objectives and needs of the client. Client goals and objectives are clarified in meetings and via correspondence, and are used to determine the course of action for

each individual client. The needs and objectives for each client are documented in client files and our portfolio management system electronically.

Clients may impose restrictions on investing in certain securities or types of securities. This must be done in writing.

Managed Assets

As of December 31, 2023 **WESTBOURNE** managed a total of \$191,110,828. \$191,110,828 managed on a discretionary basis and \$0 on a non-discretionary basis.

Fees and Compensation

Fees for investment advisory services provided are agreed to between **WESTBOURNE** and client prior to services rendered, with payment due quarterly in advance. Fees are negotiable.

Fees for portfolio management are based upon the market value of the portfolio appraised by **WESTBOURNE** quarterly and are payable quarterly in advance. Fees are deducted directly from clients' accounts under management. The investment management agreement may be canceled at any time by either party on 30 days written notice. The agreement is automatically extended from year to year unless written notice is received to the contrary, sent by ordinary mail, terminating the services as indicated above. In the event of such cancellation, the fee would be prorated to the date of termination.

- *Personal Financial Planning Fees*
Financial planning is billed at a fixed rate. Estimates are provided and a deposit requested. Since the nature of the work often involves variables or circumstances unknown at the start of the engagement, estimates are not guaranteed.
- *Concierge Services and Special Projects*
Special projects are billed at a minimum rate of \$250/hour. Estimates are provided and a deposit requested. Since the nature of the work often involves variables or circumstances unknown at the start of the engagement, estimates are not guaranteed.
- *Other Fees*
Custodians may charge transaction fees on purchases or sales of certain mutual funds, stocks, bonds, and exchange-traded funds. These transaction charges are usually relatively small and are incidental to the purchase or sale of a security. In some cases, custodians also charge monthly, quarterly or annual custody fees. Fees for custody are disclosed to clients when this type of arrangement is recommended. Mutual funds and exchange traded funds generally charge a management fee for their services as investment managers. The management fee is included in the expense ratio. Mutual fund fees also include transaction charges for the purchase or sale of securities within the fund and may charge other fees as disclosed in the fund prospectus. These fees are in addition to the fees paid by the client to **WESTBOURNE**.
- *Past Due Accounts and Termination of Agreement*
WESTBOURNE reserves the right to stop work on any account that is more than 60 days overdue.

In addition, **WESTBOURNE** reserves the right to terminate any financial planning engagement where a client has willfully concealed or has refused to provide pertinent information about financial situations when necessary and appropriate to providing proper financial advice, per the judgment of **WESTBOURNE**.

- *Compensation for the sale of securities or other investment products*

WESTBOURNE may receive fees related to insurance products such as variable annuities.

Clients whose contracts have been terminated will receive an itemized bill based on hourly rates for work completed, if applicable. Any unused portion of fees collected in advance for advisory services will be refunded within 30 days.

Performance-Based Fees and Side-By-Side Management

WESTBOURNE does not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client. However, the nature of asset-based fees allows **WESTBOURNE** to participate in the growth of the client's wealth. Our fees decline when the client's portfolio declines in value.

Types of Clients

WESTBOURNE provides investment management and financial planning to individuals, high net worth individuals, pension plans/profit sharing plans and institutions. The minimum account size for portfolio management is \$100,000. Accounts not meeting this minimum may at times be accepted on a case to case basis.

Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis

- *Financial Planning*

Strategies are devised and implemented on a client-by-client basis. Generally **WESTBOURNE** consults with each client to find agreement on the appropriate level of portfolio risk after considering factors such as personal situation, including age, health, family circumstances, income, expenses, assets, debts, liquidity needs, goals, objectives, risk tolerance, suitability and other relevant factors. **WESTBOURNE** then proposes an asset allocation strategy that attempts to maximize growth possibilities for the agreed upon level of risk, and implements the strategy by creating a multi-asset class portfolio primarily consisting of passively managed exchange-traded funds ("ETFs") and index funds. **WESTBOURNE** then monitors each client portfolio on an ongoing basis, rebalancing as necessary to ensure risk exposures are as agreed upon from the last account review and given the current and expected condition of the client, the markets, and the global economy.

Changes in the asset allocation models, which includes adding, removing or replacing securities at the discretion of WESTBOURNE, are made based on significant changes in the economic, financial or political climate; changes in the tax code; the management of the securities; and/or the client's personal circumstances, including health, employment and family status.

WESTBOURNE may replace a particular security (or securities) if it significantly diverges from its relevant index in terms of risk or return, with a security that is more in line with the risk/return profile of the relevant index or if there is a different security that in **WESTBOURNE's** opinion, would be better suited.

- *Equity & Options Management*

The Method of Analysis begins with "Top Down" understanding of all important economic variables such as interest rates, rate of inflation, money supply growth, leading economic indicators, government fiscal and monetary policies, regulatory policies as well as the impact such indicators have on industries and companies. Continuous monitoring of such data provides the basic knowledge necessary to take advantage of changes in economic trends, investor psychology and stock market price movements. "Bottom Up" securities analysis is then employed to determine the appropriate asset allocation and to structure an investment program which meets the investment objective and risk profile of each client. Such analysis includes, but is not limited to, comparative statistical analysis of financial statements, quality and track record of management, quality and reputation of the company's products and services, competitive environment and long-term growth potential. Using these analytical tools along with other pertinent knowledge, our experienced management determines and monitors the intrinsic value of each investment compared to the prevailing price of the stock. This technique provides a consistent framework for investing in companies at prices that afford the possibility of above average appreciation and dividend growth.

Material Risks

The primary risk in owning publicly traded stocks, bonds and options in the short-term is market price volatility, which can occur for internal or external factors. Long-term risks are usually related to the fundamental credit quality or investment quality of the company, its industry or the economy as a whole. Such risks can be mitigated by using the monitoring tools described under Methods of Analysis. An important risk management methodology may include the sale of covered calls on portfolio holdings and/or the sale of puts on planned purchases through a program designed to buy the shares at a price below the current market price. Such Option Strategies can provide an additional source of cash flow into the clients' account which provides a modest additional level of protection against capital loss. Option Strategies can involve frequent trading since statistically higher rates of return are often derived from short term holding periods. These commission costs represent a small fraction of the extra cash flow from option premium income. All option trading at Westbourne is channeled through discount brokers to minimize such costs. In addition, Westbourne income-oriented accounts may hold Master Limited Partnerships (MLPs), Real Estate Trusts (REITs) and other tax exempt entities which distribute 90% of taxable income in the form of dividends to shareholders. These so-called "Pass-Through" securities do not pay corporate income taxes, but the shareholder pays taxes on dividends received at

the holder's ordinary income tax rate. Thus, the above average dividend yields received by stockholders is a result of a payout that included the share of profits that would otherwise be paid to the government for taxes. Risks associated with Income Pass-Through securities include possible changes in tax laws or government regulations as well as overall economic and credit conditions.

Disciplinary Information

WESTBOURNE and its employees have not been involved in any legal or disciplinary events related to past or present activities.

Other Financial Industry Activities and Affiliations

Activities

WESTBOURNE does not participate in any other industry business activities.

Code of Ethics

Code of Ethics

WESTBOURNE has adopted a code of ethics setting forth policies and procedures, including the imposition of restrictions on itself and employees, to the extent reasonably necessary to prevent certain violations of applicable law. This Code of Ethics and Conduct is intended to set forth those policies and procedures and to state the Adviser's broader policies regarding its duty of loyalty to clients. If you would like to see this Code of Ethics you may call 703-683-8488 ext 104 to request a copy.

Participation or Interest in Client Transactions

Officers of **WESTBOURNE** may invest in stocks and mutual funds which they recommend, buy or sell for clients. All officers and employees of **WESTBOURNE** buy and sell such stocks on a "last-in, last-out" basis, so that they trade at the same time, or later, than clients to avoid any conflicts.

Brokerage Practices

Research and Other Soft Dollar Benefits

WESTBOURNE does not participate in any soft dollar benefits.

Brokerage for Client Referrals

WESTBOURNE does not recommend broker-dealers based on client referrals.

Directed Brokerage

WESTBOURNE requests clients direct accounts to specific broker-dealers to make management of assets more efficient and to keep overall costs lower for both **WESTBOURNE** and the client. Our institutional relationships with certain brokers include easier access to client information, lowered or waived commissions on certain transactions and established broker support, making solutions to various client needs easier to accomplish. **WESTBOURNE** may be unable to achieve the most favorable execution of client transactions; therefore this practice may increase transaction costs.

In certain circumstances **WESTBOURNE** will allow a client to direct accounts to a broker of their choosing. This is generally due to an already established relationship between a particular broker and the client.

Due to the account not being with the same custodian as a majority of **WESTBOURNE** accounts, the client may pay higher brokerage commissions because we cannot aggregate orders to reduce transaction costs. The client may additionally receive less favorable prices as trading will likely occur first at Brokers with established relationships due to ease of trading procedures.

Aggregate Orders

WESTBOURNE transacts aggregated or “bunched” orders, when more than two clients at a particular brokerage require a purchase or sale of the same security at the same time. All clients, accounts or funds participating in the aggregated order shall receive an average share price within the same Broker. Client is still responsible for their individual account transaction costs. Aggregate orders are executed on a revolving basis based on the Broker. Partially filled Block orders are allocated on a revolving basis by individual account holder.

Review of Accounts

All accounts are under daily supervision and periodic review by the advisors of **WESTBOURNE**. This review process focuses on the portfolio's construction relative to the client's goals, objectives, and guidelines, individual security holdings, and capital gain/loss considerations for taxable accounts.

Clients are supplied with a monthly statement of holdings from the Broker.

Client Referrals and Other Compensation

WESTBOURNE has no referral arrangements.

Custody

WESTBOURNE does not have custody of client funds or securities.

Investment Discretion

WESTBOURNE accepts discretionary authority to manage securities accounts on behalf of clients.

WESTBOURNE has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. Clients must sign a limited power of attorney before **WESTBOURNE** is given discretionary authority.

Voting Client Securities

WESTBOURNE does not vote client securities. Clients will receive their proxies or other solicitations directly from their custodian or transfer agent. Clients may contact **WESTBOURNE** directly with any question about a particular solicitation.

Financial Information

WESTBOURNE does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients. A balance sheet is not required to be provided because **WESTBOURNE** does not serve as a custodian for client funds or securities, and does not require prepayment of fees of more than \$1,200 per client, six months or more in advance.

Brochure Supplement (Part 2B)

Supervised Persons

Robert Long, Patrick Walsh, Michael Del Colliano, Hank Pramov, Aditya Bhatnagar, and Randall Smith.

Westbourne Investments, Inc.
2121 Eisenhower Ave Ste 605
Alexandria VA 22314
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As of March 13, 2024.

This brochure supplement provides information about Robert Long, Patrick Walsh, Michael Del Colliano, Hank Pramov, Aditya Bhatnagar, and Randall Smith that supplements the Westbourne Investments, Inc. (**WESTBOURNE**) brochure. You should have received a copy of that brochure. Please contact Rick Picon if you did not receive Westbourne Investments, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Robert Long, Patrick Walsh, Michael Del Colliano, Hank Pramov, Aditya Bhatnagar, and Randall Smith is available on the SEC's website at www.adviserinfo.sec.gov.

Professional Certifications

Employees have earned certifications that are required to be explained in further detail.

CERTIFIED FINANCIAL PLANNER™

CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”). The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Chartered Financial Analyst (CFA)

The Chartered Financial Analyst (CFA) charter is a professional designation established in 1962 and awarded by CFA Institute. To earn the CFA charter, candidates must pass three sequential, six-hour examinations over two to four years. The three levels of the CFA Program test a wide range of investment topics, including ethical and professional standards, fixed-income analysis, alternative and derivative investments, and portfolio management and wealth planning. In addition, CFA charterholders must have at least four years of acceptable professional experience in the investment decision-making process and must commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

Robert E. Long, CFA, CEO

Educational Background

- Year of Birth: 1931
- A.B. degree from Indiana University with a major in Economics
- J.D. degree from the George Washington University School of Law.

Business Experience

- Robert Long is Chair and CEO of **WESTBOURNE**
- Robert Long was Chair and CEO of Ariba Asset Management prior to the merger in June of 2012. Bob was principal and former president of Potomac Asset Management Inc., an investment advisory firm, which was sold in 1995. Mr. Long is a Chartered Financial Analyst (CFA), the professional designation of the CFA Institute, and past President CFA Society of Washington, D.C. He has been a principal, officer, and director of two New York Stock Exchange member firms, Johnston, Lemon & Company Inc. and Ferris Baker Watts Inc. At Johnston, Lemon & Company Inc. he also served as Secretary of Washington Mutual Investor Fund, one of the nation's largest mutual funds.

Disciplinary Information: None

Other Professional Activities

- Active in working with corporate managements, he is Chair of Emerald City Radio Partners, former Chair and CEO of Southern Star Broadcasting Inc., and past President of Business News Network Inc. He has served as a director of several public and private corporations.

Additional Compensation: None

Supervision

- Robert Long's compliance-related activities are supervised by Patrick Walsh, Chief Compliance Officer. He reviews Bob's investment advisory work through frequent office interactions. He also reviews Bob's activities through **WESTBOURNE's** client relationship management system.
- Patrick Walsh's contact information:
(703) 683-8488 ext 103 | pwalsh@westbourneinv.com

Patrick Walsh, President

Educational Background

- Year of Birth: 1973
- Completed one year at Northern Virginia Community College before founding Mercury Capital Management

Business Experience

- Mr. Walsh was the Chief Compliance Officer for Ariba Asset Management prior to the merger in June of 2012. Before that Mr. Walsh held the same position, as well as an account executive position at Goodwyn, Long & Black. Mr. Walsh along with three others founded Mercury Capital Management, LLC in October of 1996.

Disciplinary Information: None

Other Professional Activities: None

Additional Compensation: None

Supervision

- Patrick Walsh's compliance-related activities are supervised by Rick Picon, Assistant Compliance Officer and Robert Long, CEO. They review Patrick's investment advisory work through frequent office interactions. They also review Pat's activities through **WESTBOURNE**'s client relationship management system.
- Rick Picon's contact information:
(703) 683-8488 ext 104 | rpicon@westbourneinv.com
- Robert Long's contact information
(703) 683-8488 ext 102 | blong@westbourneinv.com

Michael Del Colliano, Vice President

Educational Background

- Year of Birth: 1949
- B.A., Rollins College, Winter Park, FL

Business Experience

- Mr. Del Colliano was an account executive with E.F. Hutton before joining **WESTBOURNE** in 1993. Prior to E. F. Hutton he was a radio broadcaster and also an administrative aide to a state senator. He earned his B.A. from Rollins College in history and is a licensed Life Insurance Agent. He is active as a portfolio manager as well as administration and marketing.

Disciplinary Information: None

Other Professional Activities: None

Additional Compensation: None

Supervision

- Michael Del Colliano's compliance-related activities are supervised by Patrick Walsh, Chief Compliance Officer and Robert Long, CEO. They review Michael's investment advisory work through frequent phone interactions. They also review Michael's activities through **WESTBOURNE's** client relationship management system.
- Patrick Walsh's contact information:
(703) 683-8488 ext 103 | pwalsh@westbourneinv.com
- Robert Long's contact information
(703) 683-8488 ext 102 | blong@westbourneinv.com

Hank Pramov, Managing Director

Educational Background

- Year of Birth: 1971
- Bachelor of Communication Arizona State University & George Mason University

Business Experience

- Hank Pramov joined **WESTBOURNE** as a result of the merger with Ariba Asset Management in June of 2012. Hank joined **ARIBA** in 2011 as an advisor in the mid west. He continues with **WESTBOURNE** in that position. Sixteen years experience successfully building, developing and expanding sales territories to maximize revenue growth and profitability. Solutions oriented, complex sales environment leader focused on solving business problems by cutting costs or increasing revenues. Sales success achieved through persistence, accountability, business acumen (at executive, line of business and technical levels) and solid deal management capabilities. Key management competencies in strategic planning, territory development, organizational efficiency, channel management/leverage, process and productivity improvement. Possess significant experience in personnel development, coaching, leadership and working in highly matrixed environments.

Disciplinary Information: None

Other Professional Activities: None

Additional Compensation: None

Supervision

- Hank Pramov's compliance-related activities are supervised by Patrick Walsh, Chief Compliance Officer and Robert Long, CEO. They review Hank's investment advisory work through frequent phone interactions. They also review Hank's activities through **WESTBOURNE's** client relationship management system.
- Patrick Walsh's contact information:
(703) 683-8488 ext 103 | pwalsh@westbourneinv.com
- Robert Long's contact information
(703) 683-8488 ext 102 | blong@westbourneinv.com

Aditya Bhatnagar, Managing Director

Educational Background

- Year of Birth: 1966
- Bachelor of Science in Electrical Engineering, Oklahoma State University Master of Science, Georgia Institute of Technology Master of Business Administration, University of Maryland (Robert H. Smith School of Business)

Business Experience

- Aditya Bhatnagar joined **WESTBOURNE** in January 2016 after 7 years' building an independent wealth management practice at Cambridge Investment Research, a national broker dealer, and at AXA Advisors, part of the global Paris-based AXA group. Prior to licensed practice, Aditya was a private investor for 12 years, alongside an accomplished career in international telecommunications and network services engineering and development.

Disciplinary Information: None

Other Professional Activities: Independent Insurance Agent for Various independent insurance companies.

Additional Compensation: None

Supervision

- Aditya Bhatnagar's compliance-related activities are supervised by Patrick Walsh, Chief Compliance Officer and Robert Long, CEO. They review Aditya's investment advisory work through frequent office interactions. They also review Aditya's activities through **WESTBOURNE's** client relationship management system.
- Patrick Walsh's contact information:
(703) 683-8488 ext 103 | pwalsh@westbourneinv.com
- Robert Long's contact information
(703) 683-8488 ext 102 | blong@westbourneinv.com

Randall Nolen Smith, Managing Director

Educational Background

- Year of Birth: 1946
- Graduate Harvard University cum laude, Stanford University Small Business Executive program.

Business Experience

- Randall Smith worked with **WESTBOURNE** clients for over twenty years before joining us in November of 2021. Chairman and CEO of InSite MediaCom, LLC (IMC) and InSite MediaCom 2, LLC (IMC 2)- billboard owner and manager. CEO and Executive Chairman of InSite Street Media (ISM) the DBA for companies in the street furniture advertising business with contracts with 70 municipalities in the U.S. including Los Angeles, Ca., Miami-Dade, Florida, and Nassau, Suffolk, and Westchester Counties, NY. Originally registered in the securities business in 1968 and maintained investment advisory affiliation. Certified Financial Planner.

Disciplinary Information: None

Other Professional Activities: CEO and Executive Chairman of InSite Street Media (ISM) the DBA for companies in the street furniture advertising business.

Additional Compensation: None

Supervision

- Randall Smith's compliance-related activities are supervised by Patrick Walsh, Chief Compliance Officer and Robert Long, CEO. They review Randy's activities through **WESTBOURNE**'s client relationship management system as well as through direct contact.
- Patrick Walsh's contact information:
(703) 683-8488 ext 103 | pwalsh@westbourneinv.com
- Robert Long's contact information
(703) 683-8488 ext 102 | blong@westbourneinv.com