

Item 1 – Cover Page

Halbert Wealth Management, Inc.

11719 Bee Cave Road, Suite 200

Austin, TX 78738

800-348-3601

www.halbertwealth.com

January 20, 2015

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 adviser. Registration as an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you can determine to hire or retain an Adviser.

Additional information about Halbert Wealth Management is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Material Changes

Since the last ADV Part 2, there have been no material changes made.

Currently, our Brochure may be requested by contacting Joanne Sullivan, our Office Manager, at 512-263-3800 or joanne@profutures.com. Our Brochure is also available on our web site www.halbertwealth.com, also free of charge.

Additional information about Halbert Wealth is also available via the SEC's website www.adviserinfo.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 adviser 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 two programs, **AdvisorLink** and **Halbert Investment Portfolios (“HIP”)**. We also offer select individual mutual funds on a limited basis, and may also refer clients to a program that helps clients manage their 401(k) investments. Halbert Wealth’s advice is primarily limited to advice concerning the products it offers.

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

Halbert Wealth also offers a program called Halbert Investment Portfolios. This program assists clients with investing in a portfolio comprised of allocations to various mutual funds, ETFs (equity securities that represent a basket of securities) and/or ETNs (debt securities) or other investments. This includes the Absolute Return Portfolio and Select Portfolios. A prospective client may be asked to complete a Confidential Investor Profile (the “Profile”) and provide other requested information which helps determine their suitability.

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 meet 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 Adviser 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 one of the mutual funds offered by Halbert Wealth, 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.

Our assets under management are split between discretionary and non-discretionary assets. HIP accounts are considered discretionary accounts because Halbert Wealth directly manages client assets. AdvisorLink accounts are considered non-discretionary accounts, because third party Investment Advisers manage client assets, or provide the trading signals for the management of the assets.

As of January 20, 2015, the total assets under management are:

Discretionary	\$2,900,000
Non-Discretionary	\$107,000,000

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 Advisers. The annual management fees are 1.75% to 2.50% on the assets under management. We refer and recommend to clients Investment Advisers 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 Adviser.

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 Adviser 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 Adviser for more details.)

Some Investment Advisers 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 particular program will be detailed in the client agreement with the Investment Adviser for that program.

Halbert Investment Portfolios

Halbert Wealth also offers Halbert Investment 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 HIP 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 semi-annual basis, in arrears for ARP and quarterly, 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 of the various fees, commissions and other expenses.

For individual mutual funds that Halbert Wealth offers directly, 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.

Halbert Wealth may also refer clients to the Howard Capital Management, Inc. ("HCM") 401(k) Optimizer program which helps clients select and allocate assets in their 401(k) or similar defined contribution plan. HCM charges an annual, non-refundable fee of \$348, payable in advance. There is no refund of the fee if the client terminates the account. Halbert Wealth receives a portion of this fee for soliciting the account. Clients may terminate their account at any time upon written notice. Halbert Wealth is merely a solicitor for this program, and does not monitor the performance or provide any advice concerning the program.

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 \$25,000 and going up to \$300,000, depending on the program in which the client wants to invest. The account minimums are often imposed by the Investment Adviser and in some cases are negotiable.

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

Since we recommend and refer clients to other Investment Advisers or programs with trading signals provided by other Investment Advisors, in our AdvisorLink programs, our investment strategy is more aptly called a research and evaluation strategy. Our ultimate goal is to find Investment Advisers with profitable, risk-adjusted long-term performance records. We recommend and refer our clients to these Investment Advisers. For HIP, 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 of the programs and investments offered by Halbert Wealth involve risk of loss that clients should be prepared to bear before deciding to invest.

The material risks involved vary from investment to investment. The programs in AdvisorLink vary in risk depending on the strategy. Some are designed to try to minimize risk by investing in money market funds for limited periods of time, or by using hedging techniques. Other programs attempt to increase returns by using strategies such as leverage or short trading. Some programs invest in stocks, ETFs or bonds, which have their own risks. Potential investors should review the individual disclosures for each program to get a better description of the risks and strategies involved with each of them. These programs have different levels of trading frequency. 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.

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

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 or not to recommend a particular fund. The prospectus for the fund has more information concerning this.

HIP 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.

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 examined in determining whether or not to recommend a particular fund. The prospectus for the fund has more information concerning this.

Item 9 – Disciplinary Information

Registered Investment Advisers 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

Our affiliate, ProFutures, Inc. ("PF") is registered as a commodity pool operator with the Commodity Futures Trading Commission. Gary Halbert and Debi Halbert are registered as associated persons with the National Futures Association.

PF is the General Partner or Managing Owner of a commodity pool limited partnership and a business trust. Many of the investors in the partnership and business trust are also investors with Halbert Wealth. Many of them were investors in these programs before they were clients of Halbert Wealth. PF is under common ownership with Halbert Wealth. The potential for conflicts of interest is limited, and Halbert Wealth attempts to put the interests of its clients first.

PF is the General Partner of ProFutures Diversified Fund II, L.P. and Managing Owner of ProFutures Strategic Allocation Trust. Both are commodity pools, one is a private limited partnership and one is a private business trust. They invest in managed futures accounts or other futures funds.

There could be potential conflicts of interest since management persons of Halbert Wealth are also management persons of these related entities. As a result, they spend part of their time involved in the management of these affiliated firms. However, Halbert Wealth attempts to keep any conflicts of interest to a minimum and to put the interests of clients first.

Since AdvisorLink recommends other Investment Advisers to our clients and we receive compensation from those Advisers 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 Advisers 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 Advisers available. However, it is also important to note that those Investment Advisers 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.

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, and 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.

An affiliate of Halbert Wealth, PF is the general partner/managing owner for two programs and is paid a management fee for its services. Therefore, there is a potential conflict of interest. The conflicts are minimized because both funds are closed to new investment.

In addition, our officers, directors, employees or affiliates may, from time to time, invest their own assets with the same Investment Advisers or in the same mutual funds or other securities in which our clients' assets may have been invested. As part of our due diligence examination of prospective Investment Advisers, one or more of our officers usually invests their own assets under the management of our recommended Investment Advisers. It

permits Halbert Wealth to closely monitor performance and trading techniques. These investments are generally made prior to offering an Investment Adviser or individual securities to clients. We do not believe that these investments create a serious conflict of interest with our clients, unless an Investment Adviser or a fund 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 Advisers use mutual funds which are only traded once or twice per day. Some may trade ETFs or individual bonds. However, the trades are selected and made by the Investment Adviser 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 Halbert Investment Portfolios, we do select the mutual funds, stocks, ETFs and ETNs, and employees may become aware of trades being made for client accounts.

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, 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 Joanne Sullivan at (512)263-3800.

Item 12 – Brokerage Practices

For our AdvisorLink programs, Halbert Wealth does not always select the broker/dealer used for custody and trading. The Investment Adviser 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 Investment Advisers’ ADV Part 2 and other disclosure documents for more complete details.

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, 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 as a result of these benefits. There may be other broker/dealers available at lower costs.

For our HIP program and the individual mutual funds offered by Halbert Wealth, we select the broker/dealer, currently TD Ameritrade. Halbert Wealth receives soft dollar benefits from TD Ameritrade, including duplicate client statements and confirmations, 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 as a result 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, either Gary Halbert, Phil Denney or Spencer Wright, all Investment Consultants, may contact the client to conduct a more thorough review.

For our HIP program, the accounts are generally reviewed annually. If there is a need to re-balance the accounts, it may be done at this time. The review is conducted by Gary Halbert, Phil Denney or Spencer Wright, all Investment Consultants of Halbert Wealth. 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 are any changes or notifications received from the client, Gary Halbert, Phil Denney or Spencer Wright will 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 or its affiliates. These written reports should be compared to the custodian statements, and any inconsistencies should be reported to us. For the HCM 401(k) Optimizer program, we do not have access to client account information, and therefore do not review the accounts or send out any statements for the accounts.

Item 14 – Client Referrals and Other Compensation

In some of our AdvisorLink programs, we receive compensation from outside Investment Advisers 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 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. Halbert Wealth also receives compensation for clients referred to the HCM 401(k) Optimizer program. We receive \$100 of the total fee paid by the client. This is strictly a solicitor's fee since we simply refer clients to this program, and do not monitor client accounts on an ongoing basis.

Item 15 – Custody

Clients should receive at least quarterly statements from the broker dealer 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. 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.

Item 16 – Investment Discretion

In our AdvisorLink programs, we do not have discretionary authority over client account(s). The Investment Adviser 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 our HIP program, we do have discretionary authority to determine which mutual funds, ETFs, and/or other investments to invest in the clients' accounts. All clients in the programs are generally invested in the same group of mutual funds and/or ETFs for ARP while the selection of investments for Select Portfolios 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 this authority. Halbert Wealth does not have discretionary authority over any of the mutual funds it recommends or the HCM 401(k) Optimizer Program.

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 any and all securities maintained in client portfolios. Halbert Wealth may provide advice to clients regarding the clients' voting of proxies. Third party Investment Advisers in AdvisorLink that Halbert Wealth recommends have their own Voting Client Securities policies which clients should read before they invest with the Investment Advisers 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 advisers 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

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(800)348-3601

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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 Joanne Sullivan at (512)263-3800 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.adviserinfo.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.

This other business is a related entity of Halbert Wealth and is under common ownership. Gary Halbert devotes part of his time to this other entity. Advisory clients have in the past been solicited to invest in products offered by this entity on a limited basis.

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

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Additional information about Debi Halbert is available on the SEC's website at www.adviserinfo.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

Mrs. Halbert helped organize ProFutures, Inc. ("PF"), a registered CFTC and NFA commodity pool operator, in 1984 and serves as Secretary/Treasurer of the entity.

This other business is a related entity of Halbert Wealth and is under common ownership. Debi Halbert devotes part of her time to this other entity. Advisory clients have in the past been solicited to invest in products offered by this entity on a limited basis.

Item 5 – Additional Compensation

Debi Halbert is not 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

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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 Joanne Sullivan at (512)263-3800 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.adviserinfo.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"), a registered CFTC and NFA commodity pool operator.

This other business is a related entity of Halbert Wealth as is under common ownership. Phil Denney devotes part of his time to this other entity. Advisory clients in the past have been solicited to invest in products offered by this firm on a limited basis.

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

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(800)348-3601

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Additional information about Spencer Wright is available on the SEC's website at www.adviserinfo.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.

ProFutures, Inc.
Halbert Wealth Management, Inc.
ProFutures Diversified Fund II, L.P.
ProFutures Strategic Allocation Trust

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 any of the entities listed above.

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 (shown above), 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 the appropriate website – **www.profutures.com** (for ProFutures, Inc.) or **www.halbertwealth.com**.

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