

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

There are no material changes in this brochure from the last annual updating amendment on 03/27/2019 of Rayburn West Financial Services, LLC. Material changes relate to Rayburn West Financial Services, LLC's policies, practices or conflicts of interests.

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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 Individual Health Insurance
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 \$110,845,276 in assets under management as of December 31, 2019, of which \$67,567,610 was discretionary and \$43,277,666 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. Other compensation from broker/dealer or insurance companies is paid as commissions.

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.

Any securities sold outside the advisory practice, (i.e. at the broker dealer) will not incur an advisory fee, but will have standard mutual fund fees based upon the classes.

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. Charles R. West, Jr. holds an insurance license for life, health, and disability insurance.

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.

Rayburn West Financial Services, LLC receives no referrals from any broker-dealer.

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. When a client gives us discretionary authority, we are not restricted on the broker dealer we may select to execute clients' trades. Our general guiding principle is to trade through broker-dealers who offer the best overall execution under particular circumstances. We consider actual handling of the order, the ability of the broker-dealer to settle the trade promptly and accurately, the financial standing of the broker-dealer, the ability of the broker-dealer to position stock to facilitate execution, our past experience with similar trades, and other factors.

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.

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

Item 19: Requirements for State-Registered Adviser

Charles R West, Jr., Founder and Managing Partner, has over 20 years experience in the financial services industry, beginning his career at Merrill Lynch in 1991 as a Financial Consultant in the Private Client Group. From 1998-2000, he was a Financial Consultant with First American Bank/Invest. Ray was an Asset Manager/Financial Advisor for Pinnacle Financial Partners from 2000-2007. Ray holds Series 7,63,65 Investment Licenses as well as Insurance License for Life, Health, and Disability. Ray is a 1989 graduate of the University of Tennessee (Knoxville) with a B.S. in Finance.

Andrea G. Bryant – Chief Compliance Officer

Andrea has worked at Rayburn West Financial Services, LLC since it was founded in 2007. Andrea is a 1990 graduate of Baylor University with a B.A. in Business. In 1996, she received her Doctor of Jurisprudence from the Nashville School of Law and has maintained her license to practice Law in the State of Tennessee since 1996.

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