

Form ADV
Part 2 A Firm Brochure

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This brochure provides information about the qualifications and business practices of Robertson Wealth Management and its Investment Adviser Representatives. If you have any questions about the contents of this brochure, please contact Chase M. Robertson at 713-622-4077 chase@robertsonwealth.com or Patricia Ross at pat@robertsonwealth.com 916-817-1095. The IARs are registered with Robertson Wealth Management and Ms. Ross, the Chief Compliance Officer is registered with Securities America, the Broker Dealer used by Robertson Wealth Management.

Additional information is available on the Internet at: www.adviserinfo.sec.gov. 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 our Registered Investment Adviser is available on the SEC's website at www.adviserinfo.sec.gov. You can search this site by looking for Robertson Wealth Management's Central Registration Depository's CRD number 115425. Registration of an Investment Adviser does not imply any level of skill or training.

The Securities and Exchange Commission (SEC) adopted “Amendments to Form ADV” in July 2010. One of the requirements was to write Part 2A, Firm Brochure in narrative form and plain English. While these material changes took place in 2010, clients have benefitted by having brochures and supplements written in narrative form and plain English since that time. As you will see, this document is partially written in a narrative style that is an attempt to use plain English. We hope this Brochure is easy for our clients to understand.

This Firm Brochure is prepared according to the SEC’s requirements and rules. As a state registered investment adviser, our Firm is also required to comply with the reporting and filing requirements of the Texas Securities Board. However, Robertson Wealth Management is preparing to request registration with the Securities and Exchange Commission.

Robertson Wealth Management wants you to know that the SEC was thinking of clients when they introduced these amendments. You should know that if there is anything in this Brochure you don’t understand, you should feel free to tell your adviser that the content needs to be expressed in narrative form and plain English.

Material Changes since last amendment (as of January 31, 2020):

Assets Under Management

(as of May 29,2020)

- Discretionary – \$123,408,909
- Non-discretionary - 0
- Total – \$123,408,909

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Robertson Wealth Management (hereinafter “RWM” or the “*firm*”) is a limited liability company formed under the laws of the State of Texas and Texas Securities Board and has been registered with the State of Texas as an investment adviser since 2000. We are a fiduciary and legally and ethically required to act in your best interest. RWM is affiliated with Securities America Inc., for its Broker Dealer business. The Firm’s owners are as follows: Chase M. Robertson, 5%-10%; Sonia Joao, 5%-10%; and Double C Family 75%-80%.

Assets Under Management (as of 05/29/2020)

- Discretionary – \$123,408,909
- Non-discretionary - 0
- Total – \$123,408,909

Robertson Wealth Management has a long and distinguished history. In the 1970’s, W. Michael Robertson, the founder of Robertson Wealth Management started his career in investment management by setting up one of the first Single Family Offices within Bache Halsey Stuart Shields Incorporated. He initially combined physical commodities trading (silver), private equity and energy infrastructure.

In the 1980’s, Mr. Robertson through his office at Bache Halsey, traded silver futures contracts for Nelson Bunker Hunt. The Hunt Brothers also traded silver futures through Prudential. Their goal was to corner the silver market which led to Silver Thursday. The Hunt Brothers did not corner the silver market, but Mr. Robertson increased his knowledge in commodities and began to understand the value of having his own firm.

In 1994, Robertson Wealth Management was founded by Mr. Robertson. He continued growing the business into the next decade. In the early 2000’s Robertson Wealth Management was ranked number 3 for assets under management by Registered Representative magazine. During this time, he added new services to be offered to clients. Additions were investing in distressed credit and an Opportunistic Credit Fund focused on gaming and energy. These opportunities were both Private Placements for accredited investors.

Then in 2009, Robertson Wealth Management launched Straight Talk Money, the nationally syndicated morning talk show. In 2015 and 2016 Robertson Wealth Management was ranked in the top 400 of investment advisory firms by the Financial Times.

Sadly in 2017, W. Michael Robertson, founder of Robertson Wealth Management passed away. However, his business continues through the efforts of his son Chase Michael Robertson. The Firm is still located in Houston and continues the legacy of innovative thinking and assisting clients reach their financial goals.

Prior to becoming the CEO of Robertson Wealth Management Chase Robertson’s career was in commercial banking and private equity. He has been able to leverage his experience in finance and add services that could be offered by RWM. Chase Robertson, the Robertson Wealth Management Advisers and staff look forward to working with you now and in the future.

Robertson Wealth Management Advisory Business

Currently Robertson Wealth Management Advisers have access to products/programs that our Broker Dealer, Securities America, Inc. sponsors. The first type of program sponsored by SAI is:

Adviser Managed Program

1. The first program is the Adviser Managed Program that permits Investment Adviser Representatives (IARs) to develop model strategies to manage a client's portfolio. Advisers can standardize the models to accommodate different investment objectives and risk tolerances. Through a profiling process the IAR will get to know the client by asking various suitability type questions. Once the profiling is complete policy guidelines for the portfolio will be determined and a strategy can be selected based on understanding the client's investment objectives. It is after these steps have been taken the IAR can make recommendations regarding assets to be selected to put the strategy to work.

The first step in portfolio construction is setting investment objectives. As an example, if the client is a couple, the IAR might ask if they want the portfolio to grow or provide income at retirement or possibly combine the two objectives to meet the goal. The IAR will ask questions about their risk tolerance and how much risk they are willing to take to meet their investment objective. Time horizon during the profiling process is important to know so that the adviser knows when they will need to start taking income out of their portfolio to live on. The other consideration that needs to be factored in is how much experience have they had with investing. Knowing the experience, the client has with investing gives the IAR an understanding of how much education does the client need in understanding the investment process and inherent risks in investing.

The second step in portfolio construction is to have the IAR develop policy guidelines for the portfolio. A policy for the portfolio might include making investments in socially responsible securities or the clients might request not to share anything about their portfolio with any members of their family.

The third step is the selection of a portfolio strategy and is usually a decision about the use of either active or passive or fundamental or technical analysis. As mentioned earlier fundamental analysis is an analysis of the particular characteristics of a company. Technical analysis is passive in that the IAR is usually looking at some way to replicate an existing index.

The fourth step, once the investment objective is clear to the IAR, policy guidelines have been set and a strategy is selected, the selection of assets can be acquired for the portfolio. After the assets are purchased or transferred into the client's account the IAR will begin evaluating and monitoring the performance of the portfolio.

If an RWM IAR has a client who is interested in a wrap account, it could be offered by using the Adviser Managed Program. The management of the wrap fee account, would not be any different than any other managed account in the Adviser Managed Program. The IAR could standardize models that represent different investment objectives to match clients' investment objectives and needs.

Fund Strategist Program

The second advisory program that RWM advisers have access to is the Fund Strategist Program. Again, Securities America is the sponsor. This program differs from the Adviser Managed Program in that the RWM IARs review the background and experience of several third-party money managers to determine which money manager would be the best fit for his/her client. Once the selection of a money manager is made, the RWM Adviser will refer the client to the third-party money manager. Then an agreement would be signed between the RWM adviser and the third-party money manager. A separate agreement would be signed between the client and the third-party money manager.

If a client decides to work with a third-party money manager, he/she should ask to see the Disclosure document (ADV, Part 2A) for the Fund Strategist Program.

Item 5: Fees and Compensation SAI Advisory Program

Program Fees

The various fees associated with Managed Opportunities are applied based on the program used. There are three main types of program fees that comprise the total program fee:

Platform Fee + Transaction Fee + Manager Fee = Total Program Cost

Total Program Cost + RWM Adviser Fee = Total Client Fee

All Fees (unless otherwise noted) are based on an annual percentage of assets administered.

Platform Fee

- Applies to all programs.
- There are 7 standard Platform fee breakpoints ranging from 17 basis points down to 3.5 basis points on large accounts (see example table on next page).
- There is an additional \$35 annual fee assessed to the adviser for accounts under \$40,000.
- Platform fees are “Linear” meaning the entire account bills at the lower level once a breakpoint is reached.
- Advisers can bundle family accounts into a household such that all of those accounts, regardless of size, bill at that same low breakpoint.
- Platform fees do not include trading ticket/transaction charges. Those are passed to the client account when they occur in an “unwrapped” account.

Transaction Fee

- Also referred to as a “Wrapped Fee.”
- “Wrapped Fees” only apply to accounts designed to include the cost of processing trade tickets inside the account.
- This fee does not apply to “unwrapped” accounts.
- Wrapped fees range from 17 basis points for small accounts down to 3.5 basis points on large accounts and are added to the Platform Fee in these account types.

Manager Fee

- Manager fees only apply to accounts where investment management is provided by a third-party money manager, not by your RWM IAR.
- Third party money manager accounts are Fund Strategist accounts, and Separately Managed Accounts.
- Manager fees vary by third party manager and start as low as 2 basis points. They are added to the Platform Fee + Wrapped Transaction fee shown above.

The following table is an Example of standard Platform Fees at each linear breakpoint level:

<u>Account Size</u>	<u>Basis Points</u>
\$0-\$250,000	17
\$250,000-\$750,000	14.5
\$750,000-\$1 million	12
\$1 million-\$2 million	9.5
\$2 million-\$5 million	7
\$5 million-\$25 million	4.5
\$25 million +	3.5

If you are considering opening an account with an RWM IAR, ask to see the Brochure for these accounts to make sure you have the most current information.

Financial Advisors Program

The third advisory program that RWM Advisers has been able to offer is the Financial Advisors Program. Securities America, Inc. (SAI) is the sponsor of fee-based management services and is responsible for making all changes to the managed account. SAI provides these services through the Financial Advisors Program

Although it has been available in the past, new FAP accounts have been phased out. RWM has only a few of this type of account. It is considered a wrap account meaning that all services including transaction costs are provided for one fee rather than being charged separately. Brokerage transactions are processed through SAI and cleared through National Financial Services, LLC or Pershing, LLC. and they may also act as the custodian.

Item 5 Fees and Compensation

The maximum annualized management fee that can be charged to you for these programs by the adviser or representative is 3%. The exact fee will be disclosed to you prior to investing in the program. Typically, management fees are automatically deducted from the FAP account according to an authorization provided in the client agreement.

Be sure to review the Wrap Fee Program Brochure prior to making a decision about this Program to ensure that you have access to the most current information and to all of the disclosures regarding the FAP.

Robertson Wealth Management Separately Maintained Accounts

In addition to the advisory accounts offered by Securities America as the sponsor, RWM IARs can offer Separately Maintained Accounts through Robertson Wealth Management. These accounts would be maintained by the RWM IAR. The account could be discretionary or non-discretionary depending on the preference of the client. The IAR's account design will be based on the client's investment objectives. The fee for the Separately Maintained Accounts depends on the asset size of the account:

0-2.0MM=2.0%	75.00MM-100.00MM=65BPS
2.00MM-5.0MM=1.5%	100.00MM-200.00MM=50BPS
5.00MM-25.00MM=1.0%	200.00MM=25BPS
25.00MM-75.00MM=75 BPS	

RWM IARs have considerable experience and can provide advice on the following investments:

Equities	Limited Partnerships and Master Limited Partnerships
Bonds	ETFs
REITS	Mutual Funds
Preferred Stocks	Closed-End Funds
Limited Partnerships	Fixed Income
Venture Capital	Alternative Investments

Generally, this is the list of investments on which our IARs most often provide advice. However, if a client would like advice on any investments that might be appropriate our IARs would be glad to take the opportunity to review the client's interest in a particular investment.

Item 6 Performance-Based Fees and Side-By-Side Management

Robertson Wealth does not charge performance-based fees and does not utilize Side-By-Side Management.

Item 7 Types of Clients

Robertson Wealth provides advisory services to the following types of clients:

- Individuals (including high net worth individuals) and Families
- Banks and Thrifts Institutions
- Pensions and Profit-Sharing Plans
- Trusts, Estates, and Charitable Organizations
- Corporations and Other Businesses Not Listed Above

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

Introduction

Robertson Wealth Management uses the following methods of analysis when working with our clients and providing investment advice and/or managing our clients' assets.

Our objective when assisting you reach your financial goals is to offer the considerable experience and technical knowledge of our investment advisers. The experience will enhance your understanding of our methods of analysis, investment strategies and risk of loss.

RWM uses the following methods of analysis when working with our clients and providing investment advice and/or managing their assets.

There are three primary types of analysis that we use. The three types are Fundamental Analysis, Technical Analysis and Cyclical Analysis. All three types have been used by portfolio managers for many years. Fundamental Analysis is a method of evaluating the value of a stock. This form of analysis combines external events as well as financial statements and industry trends. Technical Analysis is the science of recording, usually in graphic form, the actual history of trading (price changes, volume transactions, etc.) in a certain stock or in the stock market averages. It is believed that the conclusion from that stock market history can predict probable future trends. Charting is a subset of Technical Analysis and relies on a set of techniques used in technical analysis in which charts are used to plot price movements, volume, settlement prices, open interest, and other indicators, in order to anticipate future price movements. Users of these techniques, called chartists, believe that past trends in these indicators can be used to identify future trends. Cyclical Analysis, in Wall Street terminology, refers to stocks of companies whose earnings fluctuate with the business cycle. When business conditions improve, the company's profitability is restored and enhanced. The company stock price rises. When conditions deteriorate, business for the cyclical company falls off sharply, and its profits are greatly diminished.

Fundamental Analysis

Robertson Wealth Management attempts to measure the value of a security by looking at economic and financial factors (including the overall economy, industry conditions, and the financial condition and management of the company itself) to determine if the company is underpriced (indicating it may be a good time to buy) or overpriced (indicating it may be time to sell). Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock.

Technical Analysis

RWM analyzes past market movements and applies that analysis to the present in an attempt to recognize recurring patterns of investor behavior and potentially predict future price movement.

Technical analysis does not consider the underlying financial condition of a company. This presents a risk in that a poorly managed or financially unsound company may underperform regardless of market movement.

Cyclical Analysis

RWM analyzes cyclical stocks on the basis of the business cycle. Cyclical or Cycle Analysis is the statistical analysis of specific events occurring at a sufficient number of regular intervals that they can be forecasted into the future.

Investment Strategies

Robertson Wealth Management reserves the right to advise our clients on any other type of investment that it considers appropriate based on our clients' stated goals and objectives. We may also provide advice about any type of investment held in our clients' portfolios at the inception of the advisory relationship or any investment product on which the client requests advice. Investment advice may be given on stock positions, limited partnerships, mutual funds, bonds, REITS, preferred

stocks, ETFs and closed-end funds.

The investment management process includes at least five steps in building an investment portfolio. The first step is having the advisers work with our clients to understand their investment objective. Without getting this first step right, building a portfolio to meet their goals may risk what they are trying to accomplish. The second step is to establish policy guidelines for the portfolio. Usually large institutions have restrictions on what types of investments are permitted in their portfolio. This may be for tax reasons or for managing risk. The same is true when working with individual clients who are not comfortable with certain types of investments and do not want the risk of having certain types of investments in their portfolio.

The third step in the investment management process is to select the portfolio strategy. Selecting a portfolio that is consistent with the objectives and policy guidelines of the client or institution is the third step in the investment management process.¹ Investment strategies fall generally into two categories i.e. that of active and passive management. An active strategy includes a review of those factors that have the potential to influence the performance of the portfolio. For instance, if using equities, you would want to know what the projected earnings are for the year and what the prospects are for long-term growth. A passive strategy frequently relies on indexing as a portfolio strategy. “The objective in indexing is to replicate the performance of a predetermined index.”² Many investment advisers use a combination of both active and passive portfolio strategies.

The fourth step in building a portfolio is in selecting assets. Then, it is up to the adviser to evaluate and monitor the performance of the portfolio. The overall goal in building a portfolio is to build an efficient portfolio or how to maximize the return with a minimal amount of risk. Once this step is completed, the fifth and final step which is ongoing is to monitor the performance of the portfolio.

Although some portfolios may be similar, no two clients have identical suitability profiles. Each profile is as unique as the clients themselves. An active portfolio strategy includes a review of those factors that have the potential to influence the performance of the portfolio. A passive strategy relies on a high degree of diversification to build an efficient portfolio. Our clients are involved in deciding which is the best portfolio strategy for them.

Risk of Loss in Your Portfolio

Careful planning of your portfolio is important. However, even with the best of planning there are times when market volatility or a sudden and unexpected decline in the market creates losses in your portfolio that the most carefully planned portfolio cannot prevent. Our IARs and/or portfolio managers cannot guarantee performance and a manager’s past performance is not a predictor of future performance.

If you are a new investor or just trying to protect your assets as you plan for retirement there are a number of risks that you should be aware of. Although there are many risks to investing, some of the major risks are: market risk; inflation risk; default risk; and liquidity risk. Market risk occurs when the stock market declines and a client experiences a decline in their portfolio. Inflation risk is when inflation causes the price of goods and services to escalate so that the dollar loses value. Default risk is when a bond defaults and misses interest payments or isn’t able to pay the principal when it comes due. Liquidity risk is when you cannot convert something of value to cash and still retain its value. All of these risks have the potential to cause your portfolio to decline. Even the most efficient portfolio can experience sudden and steep declines. The recent stock market decline based on the covid19 pandemic is an example of portfolio loss that could not be predicted. **11**

¹ Portfolio and Investment Management, Frank J. Fabozzi, Page 1.

² Cohen, Zinburg and Zorkel, Investment Analysis and Portfolio Management, Page 587.

Risks to all Forms of Analysis

During the Great Recession in 2008, there were risks to stock portfolios that were not anticipated. Our investments and analysis methods rely on the assumption that the companies whose securities we purchase and sell for our clients and the rating agencies that review them are unbiased and accurate. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information. As it turned out in 2008, a few of the stock rating services made errors in their predictions about the quality of some stocks they were following. Investment firms relied on the reports they were getting and as a result made incorrect recommendations to their clients.

Risks to Individual Positions in Your Portfolio

Master Limited Partnerships (MLP) offer the advantage of liquidity but have different tax treatments. If you invest in a MLP be sure to request the prospectus for this type of investment to understand the various tax treatments. If you invest in mutual funds there is liquidity. However, the need for a portfolio manager to maintain a certain amount of liquidity for investors to liquidate their position can affect the performance of the mutual fund. If the portfolio manager cannot be fully invested so that the fund can accommodate clients who want to liquidate their position then the performance could be negatively impacted. Other funds could have risks so always ask your IAR or portfolio manager for a copy of the prospectus or brochure to be aware of the particular risks of the securities in your portfolio.

Although some of the portfolios RWM IARs manage may be similar, no two clients have identical suitability profiles. Each profile is as unique as the clients themselves. An active portfolio strategy includes a review of those factors that have the potential to influence the performance of your portfolio. A passive strategy relies on a high degree of diversification to build an efficient portfolio. Our clients are involved in deciding which is the best portfolio strategy for them.

Item 9 Disciplinary Information

We are required to disclose any legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management. The Firm has had no regulatory or legal disciplinary history in the last ten years.

Item 10 Other Financial Industry Activities and Affiliations

Item 10 A. and C. Broker Dealer and Registered Investment Adviser

RWM IARs and staff are registered with Securities America for broker dealer activities. However, RWM is a registered investment adviser with the State of Texas and the Texas Securities Board. Most of the RWM IARs are registered Series 7 and three of them have the Series 65 and the other three are grandfathered for the Series 65. The CCO has Series 7, 63, 4, 53 and 24 registrations and also holds the CRCP (Certified Regulatory and Compliance Professional) granted through FINRA and the Wharton School. The principal supervisor is registered with a Series 7, 63, and 65 and also has an open window for taking the Series 24.

All of these registrations represent a separate course of study with an exam at the end of the course in order to ensure a level of knowledge necessary for performing their responsibilities.

Item 10B: N.A.

Item 10C: We do not have any relationship or arrangement that is material to our business or to our clients or to any of the following positions: broker dealer, municipal securities dealer, or government securities dealer or broker; investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust; private investment company or “hedge fund,” and offshore fund); other investment adviser or financial planner; futures commission merchant, commodity pool operator; or commodity trading advisor; banking or thrift institution; accountant or accounting firm; lawyer or law firm; insurance company or agency; pension consultant; real estate broker or dealer; or sponsor or syndicator of limited partnerships.

Item 10D: RWM does not recommend or select other investment advisers for clients and does not receive compensation directly or indirectly from any other investment advisers. As a result, there is no conflict of interest.

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

Code of Ethics

SEC Rule 204A-1 under the Investment Advisers Act of 1940 as amended requires that all registered investment advisers adopt a Code of Ethics that sets forth the standard of conduct for the Adviser's Firm. In addition, to the standard of conduct all Federal securities laws and relevant state laws must be followed. Compliance with the Code of Ethics applies to all covered persons of Robertson Wealth Management. RWM covered persons include the CEO, CCO, Supervision Staff, IARs and Administrative Staff.

"The SEC also requires that the Code of Ethics address personal trading: they must require the adviser's personnel to report their personal securities holdings and transactions and must require personnel to obtain pre-approval of certain investments. The Commission is amending the Advisers Act recordkeeping rule to require advisers to keep copies of their code of ethics and records relating to the code records relating to the code."³

In addition, the Commission requires that the Code of Ethics is disclosed and described in Part II of Form ADV.

Covered Persons

Currently all employees and independent contractors are covered persons and are required to comply with the RWM Code of Ethics. If in the future, support personnel are hired by the Firm to act in a support capacity they would not be considered covered persons.

Standards of Business Conduct

RWM Covered Persons are required to be familiar with the Firm's Code of Ethics, conduct business in an ethical manner, act in the best interest of RWM clients at all times, comply with the Firm's policies and procedures, and all relevant federal and state laws and to act as a fiduciary at all times when working with their clients.

Pursuant to Section 206 of the Investment Advisers Act of 1940, both RWM and its supervised persons are prohibited from engaging in fraudulent, deceptive or manipulative conduct. This means that supervised persons have a duty to act in the best interest of RWM clients.

It is unlawful for any Registered Investment Adviser or Supervised Persons:

- To employ any device, scheme, or artifice to defraud a client or prospective client;
- To engage in any act, practice or course of business that involves illegal activities such as forgery, embezzlement and theft;
- To not act in the best interest of their clients;
- To engage in front running;
- To engage in fraudulent, deceptive or manipulative practice, and is contrary to any rules or regulation established by all governing regulators;
- To provide advice and a guarantee to clients that a gain or no loss will occur as a result of the advice;
- To utilize sales material including publishing, circulating or distributing advertising material that has not been approved by compliance;

³ Investment Adviser Codes of Ethics, Securities and Exchange Commission, page 3. Effective Date August 31, 2004. **13**

- To omit from written or verbal communication a material fact that would make statements regarding qualifications, services or fees misleading;
- To disclose any confidential information of any client, unless required by law to do so or having received written authorization from the client to do so.

The following fiduciary standards are required of all RWM Covered persons:

- The duty to have a reasonable, independent basis for investment advice provided;
- The duty to ensure that investment advice is suitable and meets the client's individual objectives, needs and circumstances;
- Providing full and fair disclosure of all relevant facts and any potential or actual conflicts of interest;
- Will not induce trading in a customer's account that is excessive in size or frequency in view of the financial resources and character of the account.
- Will not guarantee a client that a specific result will be achieved.
- Will fully disclose and inform their clients of potential conflicts of interest.
- The provisions of the Code are not all inclusive. Rather, they are intended as a guide for Supervised Persons of RWM and their conduct. In those situations, where a Supervised Person may be uncertain as to the intent or purpose of the Code, he/she is advised to consult with the CCO or their Supervisor. The CCO or designee may grant exceptions to certain provisions contained in the Code only in those situations.

In addition to the rules set forth in the Investment Advisers Act of 1940, the following rules have been added to the Act: Protection of Material Nonpublic Information; Personal Securities Trading; Initial and Annual Holdings Reports; Quarterly Transactions Reports; Exceptions from Reporting Requirements; Reportable Securities; Initial Public Offerings and Private Placements; Reporting Violations; Insider Trading; Educating Employees About the Code of Ethics; and Recordkeeping.

Protection of Material Nonpublic Information is required based on the Code and is discussed in Chapter 6.1 of the RWM Compliance Manual. A code of ethics is designed “to prevent access to material nonpublic information about the adviser’s securities recommendations, and client securities holdings and transactions by individuals who do not need the information to perform their duties.”⁴ The procedure to protect material nonpublic information is part of the RWM Code of Ethics to protect RWM clients.

Doing a periodic review of an adviser’s account is a tool in evaluating the standards of conduct illustrated in the trading activity of an individual IAR’s account. The RWM Code of Ethics requires that all access persons report their personal securities transactions and holdings to the CCO immediately after being hired by RWM. “The code of Ethics must require a complete report of each access person’s securities holdings, at the time the person becomes an access person and at least once a year thereafter.”⁵ The RWM Code of Ethics requires that new hires provide the CCO with the previous 6 months of brokerage statements. Additionally, the new hire must provide a contact name and address of the firm where his/her brokerage account resides. Then the CCO will notify the previous firm that brokerage statements must be forwarded to RWM Compliance going forward.

Rule 204A-1 permits three exceptions to personal securities reporting and exceptions to securities that appear to present little opportunity for the type of improper trading that the access person reports are designed to uncover.

Reports are not required if:

- If the access person is using an automatic investment plan.
- If the access person has securities or positions held in an account but has no direct or indirect influence or control over the account.
- “In the case of an advisory firm that has only one access person, so long as the firm maintains records of the holdings and transactions that rule 203A-1 would otherwise require be reported.”⁶
- The following transactions in securities are exempt from the reporting requirement of reportable securities:
 - Direct Obligations of the U.S. Government.
 - Money Market Instruments.
 - Shares of money market funds.
 - Transactions in units of a unit investment trust if the unit investment trust is invested exclusively in unaffiliated mutual funds.
- “Transactions and holdings in shares of other types of mutual funds, unless the adviser or a control affiliate acts as the investment adviser or principal underwriter for the fund.”⁷

⁴ Securities and Exchange Commission Investment Adviser Code of Ethics, page 3.

⁵ Investment Adviser Codes of Ethics, Securities and Exchange Commission, Effective Date August 31, 2004. Page 3-4.

⁶ Ibid, page 20

⁷ Ibid, page 7, page 20-21.

There are two types of investments that require pre-approval by the RWM Supervision team prior to purchase. One type is an initial public offering and the other type is a private placement. Since it is not usual that an IAR could participate in an IPO, the likelihood of needing approval is unlikely. Based on certain risk factors in private placements, it is unlikely that the RWM Supervision team would approve investing in a private placement by an IAR. However, if the IAR had the opportunity to invest in a private placement, sufficient due diligence would have to be done to determine if RWM would want an IAR to invest in a private placement. All due diligence materials would have to be presented to the CCO for review and consideration.

All violations of the RWM Code of Ethics must be reported to the CCO. The CCO will record the violation and assure the reporting party's privacy will be maintained. The CCO will investigate the allegation of the reporting party and discuss the findings with the CEO of RWM. Depending on the nature of the allegation and if the investigation concludes that the allegation did occur, disciplinary action may take place.

Educating Employees About the Code of Ethics:

"Under rule 204A-1, an adviser's code of ethics must require the adviser to provide each supervised person with a copy of the code of ethics and any amendments. The code must also require each supervised person to acknowledge, in writing, his/her receipt of those copies."⁸ The RWM CCO will include training on the Code of Ethics each year as part of the Annual Compliance Meeting. Each new hire will receive a copy of the Code of Ethics and be asked to sign a form stating that they have read the RWM Code of Ethics and will retain it in their file. The RWM Code of Ethics will be reviewed each year and any revisions will be made if necessary.

Recordkeeping

"Rule 204-2(a)(12) requires advisers to keep copies of their code of ethics, records of violations of the code and actions taken as a result of the violations, and copies of their supervised persons' written acknowledgment of receipt of the code."⁹

RWM uses Laserfiche to electronically store its records.

⁸ Ibid, page 7-8

⁹ Ibid, Page 9. Page 7-8.

At times, RWM and/or its associated persons may take positions in the same securities as clients. In order to mitigate conflicts of interest such as trading ahead of clients' transactions, and in accordance with its fiduciary responsibilities to its clients, transactions will generally be "last in" and "last out" for any trading that may occur in clients' accounts where the investment adviser has the same positions in his/her investment account.

Adviser Personal Trading

Based on Code of Ethics restrictions, all registered persons with RWM are required to notify the Chief Compliance Officer (CCO) with RWM of their personal securities accounts. The CCO will send a 407 letter to each of the investment firms that carry accounts for our advisers and request copies of the adviser's statements. Administrative staff in the office do not have brokerage accounts or other investment accounts. The CCO will review account statements and confirms to determine if any improper trading has taken place in the account since the last statement was reviewed. The CCO will look for the following activities when reviewing personal securities accounts. The objective is to determine if any violations of the RWM Code of Ethics has taken place.

- The CCO will look at the asset base to see if it has increased significantly since the time of the last review of the account.
- The CCO will check for rapid trading in the accounts.
- The CCO will monitor for the incidence of option trading that is excessive.
- The CCO will check to see if any new offering has been purchased for the account.
- The CCO will check to see if there have been any changes in the beneficiary since the first statement has been reviewed.
- The CCO will check to see if the portfolio is consistent with the stated investment objectives.
- If there is a finding, the CCO will meet with the adviser and discuss the findings and what corrective action should be taken. Based on the interview with the adviser, the CCO may recommend disciplinary steps to the CEO of the Firm.

Privacy Policy

In accordance with Gramm Leach Bliley and SEC Regulation S-P, RWM is required to provide notice to clients about its privacy policies. RWM must describe conditions under which we may disclose nonpublic personal information about our clients to nonaffiliated third parties. Privacy of consumer non-public personal information is codified under 17 CFR Part 248.30 of Regulation S-P and requires every regulated entity to adopt policies and procedures that address administrative, technical and physical safeguards for the protection of clients' non-public personal information. In order to protect the technical and physical safeguards for the protection of clients' non-public personal information all advisers' and staffs' computers are encrypted. Administrative safeguards require all advisers and staff to use passwords that are changed on a quarterly basis and software that protects against cybersecurity.

RWM has developed policies and procedures designed to protect the non-public personal information of our clients. RWM does not disclose any nonpublic personal information about our clients or former clients to any nonaffiliated third parties, except as permitted by law. In the course of servicing a client's account, RWM may share some information with its service providers, such as transfer agents, custodians, broker-dealers, accountants, and lawyers. We restrict internal access to non-public personal information of our clients to those associated persons of RWM who don't need access to this information in order to provide services to our clients. RWM provides a copy of our Privacy Policy upon the establishment of the customer relationship. This is generally when the person fills out new account paperwork. You will receive a privacy policy every twelve months as long you remain a client.

It has always been and will continue to be RWM's policy never to sell information about current or former clients or their accounts to anyone. It is also RWM's policy not to share information unless required to process a transaction, at the request of a client, or as required by law.

Item 12 Brokerage Practices

At this time RWM does not recommend broker dealers for client transactions. We are affiliated with Securities America, Inc. and as a result either use Pershing, TD Ameritrade or Schwab as our custodian.

RWM also does not use soft dollars and has no plans to do so in the near future. We also do not use directed brokerage for our clients.

Aggregation of Orders

Where the firm buys or sells the same security for two or more clients, RWM may place concurrent orders with a single broker, to be executed together as a single “block” in order to facilitate orderly and efficient execution. Whenever the firm aggregates trades, each account on whose behalf an order is placed is determined in advance of order placement. Each account receives the average price of the overall order, and bears a proportionate share of all transactional costs.

Allocations of orders among client accounts must be made in a fair and equitable manner. Once the transaction is complete, RWM then instructs the executing broker to calculate the average price for all shares so traded. If an order is only partially filled, it shall be allocated on a pro-rata basis. There is no allocation to an account or set of accounts based on account performance or the amount or structure of management fees. However, the following factors may justify an allocation that deviates from the general rule.

Specific allocations may be chosen based upon an account's existing positions in securities.

- Specific allocations may be chosen because of the cash availability of one or more particular accounts.
- An account's allocation may be eliminated, reduced or increased because of investment policies and restrictions, account guideline limitations or investment objectives.
- Specific allocations may be chosen for tax reasons.

RWM will receive no additional compensation or remuneration of any kind as a result of the aggregation of client trades.

Trade Error Correction Procedures

On infrequent occasions, an error may be made in a client account. For example, a security may be erroneously purchased for a single client account instead of sold. In these situations, RWM generally seeks to rectify the error by placing the client account in a similar position as it would have been had there been no error. Depending on the circumstances, various corrective steps may be taken, including, but not limited to, canceling the trade, adjusting an allocation, and/or reimbursing the account. In the event of a profit resulting from a trade error, the client would not maintain the profit which would be allocated to the broker-dealer executing the trade.

Item 13 Review of Accounts

If you open an account with RWM, we want to make sure that your investments match your investment objectives. As a result, RWM uses a 4-tier review process for clients' accounts to ensure that we are acting in your best interests. The first review occurs when a new account is opened and the IAR goes over the investment objectives and other suitability information with you. The second review occurs when RWM Supervision reviews the new account information for accuracy and either approves the account or has questions that the IAR should cover with you before asking for your signature on the new account application. The third review occurs when RWM Supervision completes reviews each quarter to determine that the suitability information for the client matches your portfolio. The fourth review is completed annually to make sure that there have been no changes to your objectives and that the suitability data we collected is still an accurate representation of your investment objectives.

Clients will receive quarterly performance reports from the account custodian.

Item 14 Client Referrals and Other Compensation

It is Robertson Wealth's policy not to engage solicitors or to pay related or non-related persons for referring potential clients to our firm. There is one exception to this policy. If one of our advisers utilizes a third-party portfolio manager offered by Securities America, Inc. as a sponsor, our adviser would be a solicitor. As a solicitor, our adviser would share in the portfolio management fee with the portfolio manager.

It is RWM's policy not to accept or allow our related persons to accept any form of compensation, including cash, sales awards or other prizes, from a non-client in conjunction with the advisory services we provide to our clients.

Item 15 Custody

Rule 206(4)-2 requires advisers with custody of client assets to maintain client funds and client securities in accounts with “qualified custodians” (i.e., banks, savings associations and registered broker dealers). An adviser is deemed to have custody of client assets when:

- It has actual possession (even if it is merely forwarding securities or funds to another custodian).
- It is authorized to deduct advisory fees or other expenses directly from a client’s account.
- It has authority to withdraw funds or securities from a client’s account maintained by another custodian.
- If it acts in any capacity that gives the adviser legal ownership of, or access to, the client’s funds or securities (e.g., a general partner of a limited partnership, trustee of a trust, or managing member of a limited liability company).
- If, under certain circumstances, client funds or securities are held by an affiliate.
- RWM does not accept or maintain custody of client funds or securities. The Firm will not accept, hold (directly or indirectly), client funds or securities or have the ability to obtain possession of them. If the Firm inadvertently receives client funds or securities, the Firm will return such funds or securities to the client within three business days. RWM will maintain the assets of its advisory clients in accounts with a “qualified custodian” pursuant to Rule 206(4)-2 under the Advisers Act and will notify advisory clients in writing of the qualified custodian’s name, address and the manner in which the assets are maintained promptly when the account is opened and following any changes to this information. Prior to opening an account with the qualified custodian provides quarterly account statements directly to RWM’s clients or an independent representative of the client, provided the independent representative is qualified to receive the client’s account statement.
- RWM will instruct clients that all client’s checks should be made payable to the account’s custodian. If a client delivers to RWM a check payable to the custodian or a broker dealer or delivers to RWM a stock certificate issued in the client’s name, RWM will forward the check or the stock certificate to the custodian promptly. Under no circumstances will RWM accept bearer securities from a client.
- To avoid being deemed to have custody, RWM has adopted the following procedures:
- Neither RWM nor any of its staff may have signatory power over any client’s brokerage or checking account.
- Neither RWM nor any of its staff may have the power to unilaterally wire funds from a client’s account to a third party.
- Neither RWM nor any of its staff may hold any client’s securities or funds in the Adviser’s name at any financial institution.
- Neither RWM nor any of its staff may physically hold the cash or securities of any client.
- Neither RWM nor any of its staff may have general power of attorney over a client’s account.

The RWM Investment Advisory Agreement discloses that client's fees are to be deducted from their investment account. Once the fees are calculated, RWM will notify the client's custodian the amount of the fee to be deducted from the client's account. There is no standing letter of authorization for the client to have RWM fees deducted from his/her investment account.

Item 16 Investment Discretion

RWM provides discretionary and non-discretionary asset management services. If a discretionary account is opened the account agreement gives power of attorney to the adviser to have discretion over the account. A non-discretionary account would require that the adviser talk with the client and gain permission to place any trades in the client's account.

Item 17 Voting Client Securities

Robertson Wealth will not take any action or render any advice with respect to voting of proxies solicited by, or with respect to, the issuers of securities in which client's assets may be invested.

Item 18 Financial Information

RWM does not require or solicit payment of fees in excess of \$500 per client more than six months in advance of services rendered. Therefore, we are not required to provide financial statements to clients.

As an advisory firm we are also required to disclose any financial condition that is likely to impair our ability to meet our contractual obligations. RWM has no additional financial circumstances to report. RWM has not been the subject of a bankruptcy petition at any time during the past ten years.

Item 19 Requirements for State-Registered Advisers

Chase M. Robertson is the Chief Executive Officer of Robertson Wealth Management.

Information regarding the formal education and business background for each of the Investment Advisor Representatives is provided in Part 2B: Brochure Supplement.

**Chase Michael Robertson
Part 2B of Form ADV:
Brochure Supplement**

Robertson Wealth Management, LLC

5120 Woodway, Suite 9029
Houston, TX 77056
Telephone: (713) 622-4077

August 15, 2020

This brochure supplement provides information about investment adviser representative: Chase Michael Robertson (CRD# 5404845) that supplements the brochure. You should have received a copy of that brochure. Please contact Rhonda Shuman at rhonda@robertsonwealth.com if you did not receive the brochure.

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

Item 2 Educational, Background and Business Experience

Full Legal Name: Chase Michael Robertson

Born: 08/05/1983

Education

- B.B.A., Texas Tech University/Management/2007

Business Experience

- Registered Representative, Securities America 11/19-Present
- Registered Representative, First Allied Securities 01/2017-11/2019
- Registered Investment Adviser Representative, First Allied Advisory Services, 12/2016-11/2019
- Principal/Investment Adviser, Robertson Wealth Management, LLC-02/09/2017-Present
- Principal, Co-Head Energy, Industry Capital -- 04/2014 to 12/2016/09/2017
- Senior Commercial Banking Officer, iBeria Bank -- 10/2009 to 03/2014
- CFO, Medallion Global -- 02/2006 to 10/2009
- Trader, Next Financial -- 08/2007 to 04/2008

Professional Designations

- None

Item 3 Disciplinary Information

- None

Item 4 Other Business Activities

A. Investment-Related Activities

- Robertson Global Credit, LLC – Personal Investment
- Chase Robertson is an Investment Adviser Representative with Robertson Wealth Management LLC. He is also a Registered Representative with Securities America.

B. Non-Investment-Related Activities

Item 5 Additional Compensation

- Vgas – Director – 60k

Item 6 Supervision

While at First Allied one of their supervisors was responsible for the supervision of the business of Robertson Wealth Management. Since moving to Securities America Inc. their Supervision Team has supervised the broker dealer business of Robertson Wealth Management. The CCO has written the Compliance Manual, developed a testing program and updated the ADV, Brochure and Supplement. A Supervisor for the Advisory Business has been hired and will start in July.

Item 7 Requirements for State-Registered Advisers

Chase M Robertson has not been the subject of a bankruptcy petition nor has he ever been involved in any of the following events;

An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:

- (a) an investment or an investment-related business or activity;
- (b) fraud, false statement(s), or omissions;
- (c) theft, embezzlement, or other wrongful taking of property;
- (d) bribery, forgery, counterfeiting, or extortion; or
- (e) dishonest, unfair, or unethical practices.

An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:

- (a) an investment or an investment-related business or activity;
- (b) fraud, false statement(s), or omissions;
- (c) theft, embezzlement, or other wrongful taking of property;
- (d) bribery, forgery, counterfeiting, or extortion; or
- (e) dishonest, unfair, or unethical practices.

**Patricia Ann Ross
Part 2B of Form ADV:
Brochure Supplement**

Robertson Wealth Management, LLC

5120 Woodway, Suite 9029
Houston, TX 77056
Telephone (713) 622-4077

August 15, 2020

This brochure supplement provides information about Chief Compliance Officer: Patricia Ann Ross (CRD#717926) that supplements the brochure. You should have received a copy of the brochure. If you did not, please contact Rhonda Shuman at rhonda@robertsonwealth.com.

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

Item 2 Educational Background and Business Experience

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Full Legal Name: Patricia Ann Ross

Born: 12/25/1938

Education

- Ph.D., University of North Texas 1974-1977, Specialization in Statistics and Research Methods.
- M.A., Southern Methodist University, 1973-1974, Specialization in Statistics and Research Methods.
- B.A., University of Texas at Arlington, 1971-1973, Specialization in the Social Sciences.

Other Business Experience

From 1977-1986, I held Assistant Professor positions at Texas Tech University in Lubbock, Texas where I taught statistics, research methods, demography and sociology. In 1985, taught small business management at San Francisco State. In 1986, I taught investments in the MBA Program at Golden Gate University and investments in the CFP Program.

Item 3 Disciplinary Information

No disciplinary Action in the Last Ten Years

Item 4 Other Business Activities

- 1979-1981, Registered Representative with Sutro & Co. in San Francisco, sold mutual funds and limited partnerships.
- 1981-1987, Co-Founder of Cypress Ross and Associates in San Francisco, CA, Chief Compliance Officer, Managed the Business and sold and conducted analysis on mutual funds and limited partnerships.
- 1987, I was recruited to Wells Fargo as the Statewide Sales Manager for the fixed income sales department. I remained at Wells Fargo for 17 years and was recruited into the brokerage division where I started the broker dealer training department, then was recruited to become the Chief Compliance Officer of the brokerage division and was asked to serve on the Enterprise Wide Acquisition Committee as the brokerage compliance representative before leaving Wells Fargo in 2003 after being asked by a leading law firm to become involved in litigation and arbitration as an expert witness.
- I continued Expert Witness work from 2006-2007 until being recruited to act as the Chief Compliance Officer for an insurance broker dealer in Salt Lake City Utah.
- In 2007, I was recruited by LPL to start the Regulatory Affairs Group. Before leaving LPL, I was asked to head up the Surveillance Department and then was asked to supervise a team of principals who supervised over 10,000 OSJ Managers.
- In 2012, I returned to consulting and Expert Witness work and was asked by a major law firm to be the Expert Witness for one of the largest fraud cases in U.S. history. From 2012-2016 I was the Expert Witness for some of the largest litigation cases in the financial services industry.
- In 2016 I accepted a position as the Chief Compliance Officer for a small investment advisory firm that managed mutual funds.
- In 2019 I accepted the position of Chief Compliance Officer of Robertson Wealth Management.

Professional Designations

Patricia Ann Ross holds the following registrations: Series 7, 63, 24, 4 and 53.
CRCP (Certified Regulatory and Compliance Professional)

Item 5 Additional Compensation

- None

Item 6 Supervision

While at First Allied one of their supervisors was responsible for the supervision of the business of Robertson Wealth Management. Since moving to Securities America Inc. their Supervision Team has supervised the broker dealer business of Robertson Weal Management. The CCO has written the Compliance Manual, developed a testing program and updated the ADV, Brochure and Supplement. A Supervisor for the Advisory Business has been hired and will start in July.

Item 7 Requirements for State-Registered Advisers

Patricia A. Ross has not been the subject of a bankruptcy petition nor has she ever been involved in any of the following events;

An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:

- (a) An investment or an investment-related business or activity;
- (b) (fraud, false statements(s), or omissions;
- (c) Theft, embezzlement, or other wrongful taking of property;
- (d) Bribery, forgery, counterfeiting, or extortion; or
- (e) Dishonest, unfair or unethical practices.

An Award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:

- (a) an investment or an investment-related business or activity;
- (b) fraud, false statement(s), or omissions;
- (c) theft, embezzlement, or other wrongful taking of property;
- (d) bribery, forgery, counterfeiting, or extortion; or
- (e) dishonest, unfair, or unethical practices.

**Sonia Constance Joao
Part 2B of Form ADV:
Brochure Supplement**

Robertson Wealth Management, LLC

5120 Woodway, Suite 9029
Houston, TX 77056
Telephone: (713) 622-4077

August 15, 2020

This brochure supplement provides information about investment adviser representative: Sonia Constance Joao (CRD#717926) that supplements the brochure. You should have received a copy of the brochure. If you did not, please contact Rhonda Shuman at rhonda@robertsonwealth.com.

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

Item 2: Educational Background and Business Experience**Full Legal Name:** Sonia Constance Joao**Born:** 11/15/1981**Education:**

- Attended Stephen F. Austin State University/Studied Biology. No Degree.

Business Experience:

- Robertson Wealth Management, Registered Investment Adviser Representative, 08/2020-Present.
- Sizemore Capital Management, Registered Investment Adviser Representative 07/2019-08/2020.
- Robertson Wealth Management, Registered Investment Adviser Representative, Chief Operating Officer and Managing Partner.
- Barrington Financial Advisors, Vice President 02/2010-04/2013
- FJS Advisors, Vice President 12/2006-02/2010
- Ameriprise Financial, Advisor Practice Executive, 04/2004-11/2006.

Professional Designations:

- None

Item 3: Disciplinary Information:**Item 4: Other Business Activities**

- None

Item 5: Additional Compensation

- None

Item 6: Supervision

While at First Allied one of their supervisors was responsible for the supervision of the business of Robertson Wealth Management. Since moving to Securities America Inc. their Supervision Team has supervised the broker dealer business of Robertson Weal Management. The CCO has written the Compliance Manual, developed a testing program and updated the ADV, Brochure and Supplement. A Supervisor for the Advisory Business has been hired and will start in July.

Item 7 Requirements for State-Registered Advisers

Sonia Constance Joao has not been the subject of a bankruptcy petition nor has she ever been involved in any of the following events:

An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:

- (a) An investment or an investment-related business or activity;
- (b) Fraud, false statement(s), or omissions;
- (c) Theft, embezzlement, or other wrongful taking of property;
- (d) Bribery, forgery, counterfeiting, or extortion; or
- (e) Dishonest, unfair, or unethical practices.

An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:

- (a) An investment or an investment-related business or activity;
- (b) Fraud, false statement(s), or omissions;
- (c) Theft, embezzlement, or other wrongful taking of property;
- (d) Bribery, forgery, counterfeiting, or extortion; or
- (e) Dishonest, unfair, or unethical practices.

Frederick Allen Mecklenburg Sr.
Part 2B of Form ADV:
Brochure Supplement

Robertson Wealth Management, LLC

5120 Woodway, Suite 9029
Houston, TX 77056
Telephone: (713) 622-4077

August 15, 2020

This brochure supplement provides information about investment advisor representative: Fred Mecklenburg (CRD# 726227) that supplements the brochure. You should have received a copy of this brochure. Please contact Rhonda Shuman at rhonda@robertsonwealth.com if you did not receive the brochure supplement.

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

Item 2: Educational, Background, and Business Experience.**33****Full Legal Name:** Frederick Allen Mecklenburg Sr **Born:** 02/09/1946**Education:** B.A. University of North Texas, Political Science and History 1971
M.A. University of North Texas, Political Science and Computer Science 1973**Business Experience:**

- Registered Representative, Securities America, Inc. 12/2019-Present
- Registered Investment Adviser Representative, Robertson Wealth Management, LLC -- 01/2011 to Present
- Registered Investment Adviser Representative, First Allied Securities, Inc. 04/2010- 11/2019
- Registered Investment Adviser Representative, First Allied Advisory Services, Inc. 07/2012- 11/2019
- Registered Representative, First Allied Securities, Inc. 05-2010-11/2019
- Registered Investment Adviser Representative, James E. Bashaw & Co. 06/2005-06/2010
- Registered Investment Advisor Representative, James E. Bashaw & Co.-- 05/2004- 04/2010
- Financial Consultant, LPL Financial Corporation -- 07/2003- 05/2010

Professional Designations:

- None

Item 3 Disciplinary Information

- None

Item 4: Other Business Activities**A. Investment-Related Activities**

- None

B. Non-Investment Related Activities

- None

Item 5: Additional Compensation

- None

Item 6: Supervision

While at First Allied one of their supervisors was responsible for the supervision of the business of Robertson Wealth Management. Since moving to Securities America Inc. their Supervision Team has supervised the broker dealer business of Robertson Wealth Management. The CCO has written the Compliance Manual, developed a testing program and updated the ADV, Brochure and Supplement. A Supervisor for the Advisory Business has been hired and will start in July.

Item 7: Requirements for State-Registered Advisers

Fred Mecklenburg has not been the subject of a bankruptcy petition nor has he ever been involved in any of the following events;

1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
 - (a) an investment or an investment-related business or activity;
 - (b) fraud, false statement(s), or omissions;
 - (c) theft, embezzlement, or other wrongful taking of property;
 - (d) bribery, forgery, counterfeiting, or extortion; or
 - (e) dishonest, unfair, or unethical practices.
2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
 - (a) an investment or an investment-related business or activity;
 - (b) fraud, false statement(s), or omissions;
 - (c) theft, embezzlement, or other wrongful taking of property;
 - (d) bribery, forgery, counterfeiting, or extortion; or
 - (e) dishonest, unfair, or unethical practices.

**Dawn Moore
Trammell
Part 2B of Form ADV:
Brochure Supplement**

**Robertson Wealth Management,
LLC**

5120 Woodway, Suite 9029
Houston, TX 77056
Telephone: (713) 622-4077

August 15, 2020

This brochure supplement provides information about investment adviser representative: Dawn M. Trammell (CRD# 1584606) that supplements the brochure. You should have received a copy of that brochure. Please contact Rhonda Shuman at rhonda@robertsonwealth.com if you did not receive the brochure supplement.

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

Item 2 Educational, Background and Business

Experience

Full Legal Name: Dawn Moore Trammell

Born: 09/01/1949

Education

- Lovington High School, Lovington, NM, Abilene Christian University

Business Experience

- Securities America, Inc. – Registered Representative, 11/2019-Present.
- Registered Investment Adviser Representative, Robertson Wealth Management, LLC 12/05/2018-Present
- Ameriprise Financial Services – 08/2014 – 09/2015
- First Allied Advisory Services – 07/2012 – 08/2014
- First Allied Securities, Inc. – 03/1995 – 07/2012

Professional Designations

- None

Item 3 Disciplinary Information

- Dawn Trammell has no reportable disciplinary history.

Item 4 Other Business Activities

A. Investment-Related Activities

- Dawn Trammell is not involved in such activities.

B. Other Investment Activities

- Dawn Trammell is not involved in such activities.

C. Non-Investment-Related Activities

- Dawn Trammell is not involved in such activities.

Item 5 Additional Compensation

- Dawn Trammell does not receive any economic benefit from a non-advisory client for the provision of advisory services.

Item 6 Supervision

While at First Allied one of their supervisors was responsible for the supervision of the business of Robertson Wealth Management. Since moving to Securities America Inc. their Supervision Team has supervised the broker dealer business of Robertson Wealth Management. The CCO has written the Compliance Manual, developed a testing program and updated the ADV, Brochure and Supplement. A Supervisor for the Advisory Business has been hired and will start in July.

Item 7 Requirements for State-Registered Advisers

Dawn Trammell has never been the subject of a bankruptcy petition nor has he ever been involved in any of the following events:

1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
 - (a) an investment or an investment-related business or activity;
 - (b) fraud, false statement(s), or omissions;
 - (c) theft, embezzlement, or other wrongful taking of property;
 - (d) bribery, forgery, counterfeiting, or extortion; or
 - (e) dishonest, unfair, or unethical practices.
2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
 - (a) an investment or an investment-related business or activity;
 - (b) fraud, false statement(s), or omissions;
 - (c) theft, embezzlement, or other wrongful taking of property;
 - (d) bribery, forgery, counterfeiting, or extortion; or
 - (e) dishonest, unfair, or unethical practices.

**Robert William Kasten
Part 2B of Form ADV:
Brochure Supplement**

Robertson Wealth Management, LLC

5120 Woodway, Suite 9029
Houston, TX 77056
Telephone (713) 622-4077

August 15, 2020

This brochure supplement provides information about investment adviser representative: Robert William Kasten (CRD#1571758) that supplements the brochure. You should have received a copy of that brochure supplement or if you have any questions about the contents of this supplement.

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

Item 2 Educational, Background and Business Experience

Full Legal Name: Robert William Kasten

Education

- B.A., Psychology and Criminal Justice

Business Experience

- Securities America, Inc., Registered Representative-12/2019-Present.
- Registered Investment Adviser Representative, Robertson Wealth Management, LLC – 01/2015-Present
- First Allied Securities, Inc.—01/2015-12/2019
- Registered Investment Adviser Representative-First Allied Advisory Services, Inc.— 01/2015-12/2019
- Voya Financial Advisors/ING Financial Partners—02/2004-09/2014

Item 3 Disciplinary Information

Recently Robertson Wealth Management was notified by First Allied, our former Broker Dealer that they were in receipt of a Statement of Claim that our investment adviser representative Robert Kasten was referenced in a State of Claim regarding suitability with First Allied named as the respondent. Mr. Kasten was not named as a respondent.

Item 4 Other Business Activities: Investments in Real Estate; Insurance Investment Related

A. Investment-Related Activities

- Robert Kasten is not involved in such activities.

B. Other Investment Activities

- Robert Kasten is not involved in such activities.

C. Non-Investment-Related Activities

- Robert Kasten is not involved in such activities.

Item 5 Additional Compensation

- None

Item 6 Supervision

While at First Allied one of their supervisors was responsible for the supervision of the business of Robertson Wealth Management. Since moving to Securities America Inc. their Supervision Team has supervised the broker dealer business of Robertson Wealth Management. The CCO has written the Compliance Manual, developed a testing program and updated the ADV, Brochure and Supplement. A Supervisor for the Advisory Business has been hired and will start in July.

Item 7 Requirements for State-Registered Advisers

Robert William Kasten has not been the subject of a bankruptcy petition nor has he ever been involved in any of the following events;

1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
 - (a) An investment or an investment-related business or activity;
 - (b) Fraud, false statements (s), or omissions;
 - (c) Theft, embezzlement, or other wrongful taking of property;
 - (d) Bribery, forgery, counterfeiting, or extortion; or
 - (e) Dishonest, unfair, or unethical practices.
2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
 - (a) An investment or an investment-related business or activity;
 - (b) Fraud, false statement(s), or omissions;
 - (c) Theft, embezzlement, or other wrongful taking of property;
 - (d) Bribery, forgery, counterfeiting, or extortion; or
 - (e) Dishonest, unfair, or unethical practice

**John Edward Langston
Part 2B of Form ADV;
Brochure Supplement**

Robertson Wealth Management, LLC

5120 Woodway, Suite 9029
Houston, TX 77056
Telephone: (713) 622-4077

August 15, 2020

This brochure supplement provides information about investment adviser representative: John Langston (CRD# 1364931) that supplements the brochure. You should have received a copy of that brochure. Please contact Rhonda Shuman @rhonda@robertsonwealth.com if you did not receive the brochure supplement.

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

Item 2 Educational, Background and Business Experience

Full Legal Name: John Edward Langston

Born: 11/20/1948

Education:

- 1973-1974 - Southeast Missouri State University
- 1975-1978 - Wichita State University
- No degree attained.

Business Experience

- Registered Representative-Securities America, Inc., 11/2019-Present
- Registered Investment Adviser Representative, Robertson Wealth Management LLC, 01/2018-Present
- Registered Investment Adviser Representative, First Allied Advisory Services, Inc., 07/2012-11/2019
- Registered Representative, First Allied Securities, Inc. 11/2004-11/2019

Professional Designations

Certified Wealth Strategist (CWS)

Prerequisites: Three years of experience in the financial services industry that must also include direct interaction with clients and a 4-year degree from an accredited school.

Education Requirements: Candidates must complete

- Two instructor-led training sessions;
- Self-directed study on numerous wealth management issues; and a
- Capstone project: a written document demonstrating a sustainable framework which applies the new knowledge and skills to the practitioner's business.

Examination Type: Ten Mastery Exams, one for each directed study module

Continuing Education Requirements: 33 hours every two years

Item 3 Disciplinary Information

- None

Item 4 Other Business Activities

A. Investment-Related Activities

- John Langston is a Registered Representative with Securities America, Inc.

B. Non-Investment-Related Activities

Item 5 Additional Compensation

- None

Item 6 Supervision

While at First Allied one of their supervisors was responsible for the supervision of the business of Robertson Wealth Management. Since moving to Securities America Inc. their Supervision Team has supervised the broker dealer business of Robertson Wealth Management. The CCO has written the Compliance Manual, developed a testing program and updated the ADV, Brochure and Supplement. A Supervisor for the Advisory Business has been hired and will start in July.

Item 7 Requirements for State-Registered Advisers

John Langston has been the subject of a bankruptcy petition:

- Chapter 7 personal bankruptcy 1994

John Langston has never been involved in any of the following events' award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:

- (a) an investment or an investment-related business or activity;
- (b) fraud, false statement(s), or omissions;
- (c) theft, embezzlement, or other wrongful taking of property;
- (d) bribery, forgery, counterfeiting, or extortion; or
- (e) dishonest, unfair, or unethical practices.

An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:

- (a) an investment or an investment-related business or activity;
- (b) fraud, false statement(s), or omissions;
- (c) theft, embezzlement, or other wrongful taking of property;
- (d) bribery, forgery, counterfeiting, or extortion; or
- (e) dishonest, unfair, or unethical practice.

**Ellias David Stabinsky
Part 2B of Form ADV:
Brochure Supplement**

Robertson Wealth Management, LLC

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Houston, TX 77056
Telephone: (713) 622-4077

August 15, 2020

This brochure supplement provides information about investment adviser representative: Ellias David Stabinsky (CRD# 1571758) that supplements the brochure. You should have received a copy of that brochure. Please contact Rhonda Shuman at rhonda@robertsonwealth.com if you did not receive the brochure supplement.

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

Item 2 Educational, Background and Business Experience

Full Legal Name: Ellias David Stabinsky

Born: 10/01/1949

Education

- B.A., LSU/1976

Business Experience

Registered Representative, Securities America, Inc. 12/2019-Present

- Registered Investment Adviser Representative, Robertson Wealth Management, LLC 02/09/2017 to Present
- Registered Investment Adviser, Representative, First Allied Securities, Inc. – 03/2004-07/2012
- Registered Investment Adviser, Representative First Allied Advisory Services, Inc.-07/2012-11/2019
- Registered Representative, First Allied Securities Inc. 04/2003-11/2019
- Financial Consultant, A.G. Edwards -- 2001-2003
- Financial Consultant, Merrill Lynch -- 1986-2001

Professional Designations

- None

Item 3 Disciplinary Information

- 12/19/2016 – IRS Lien/Judgement
- 11/10/2016 – IRS Lien/Judgement
- 10/07/2010 – Pharia, LLC/Lien/Judgement
- 06/04/2009 – Dodeka, LLC/Lien/Judgement

Item 4 Other Business Activities

A. Investment-Related Activities

- Ellias Stabinsky is an Investment Adviser Representative with Robertson Wealth Management.

B. Non-Investment-Related Activities

- Running Coach
- Rice Alliance for Technology

Item 5 Additional Compensation

- None

Item 6 Supervision

While at First Allied one of their supervisors was responsible for the supervision of the business of Robertson Wealth Management. Since moving to Securities America Inc. their Supervision Team has supervised the broker dealer business of Robertson Wealth Management. The CCO has written the Compliance Manual, developed a testing program and updated the ADV, Brochure and Supplement. A Supervisor for the Advisory Business has been hired and will start in July.

Item 7 Requirements for State-Registered Advisers

Ellias David Stabinsky has not been the subject of a bankruptcy petition nor has he ever been involved in any of the following events;

An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:

- (a) an investment or an investment-related business or activity;
- (b) fraud, false statement(s), or omissions;
- (c) theft, embezzlement, or other wrongful taking of property;
- (d) bribery, forgery, counterfeiting, or extortion; or
- (e) dishonest, unfair, or unethical practices.

An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:

- (a) an investment or an investment-related business or activity;
- (b) fraud, false statement(s), or omissions;
- (c) theft, embezzlement, or other wrongful taking of property;
- (d) bribery, forgery, counterfeiting, or extortion; or
- (e) dishonest, unfair, or unethical practices.

**Patrick McGill
Part 2B of Form ADV:
Brochure Supplement**

Robertson Wealth Management LLC

5120 Woodway, Suite 9029
Houston, TX 77056
Telephone: (713) 622-4077

January 26, 2021

This brochure supplement provides information about investment adviser representative: Patrick Robert McGill (CRD# 6313505) that supplements the brochure. Please contact Patricia Ross at 916-817-1095 if you have any question about this brochure.

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

Item 2 Educational, Background and Business Experience

Full Legal Name: Patrick Robert McGill

Born: 1985

This Brochure Supplement provides information about Patrick Robert McGill that supplements the Robertson Wealth Management Brochure. Additional information about Patrick Robert McGill is available on the SEC's website at www.adviserinfo.sec.gov.

Mr. McGill graduated from Virginia Military Institute in 2007 with a Bachelor of Arts degree in Economics and Business. Mr. McGill also completed the requirements to become a Certified Financial Planner. His studies included the content necessary for the competent and professional delivery of financial planning services. The CFP Board's financial planning subject areas include professional conduct and regulation, general principles of financial and education planning, risk management, insurance, investment and income tax planning, and retirement savings and income and estate planning. The CFP examination is administered in 6 hours and 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 as part of the program's examination.

Item 3 Experience:

- The CFP Board requires 6,000 hours of experience through the Standard Pathway course of study or 4,000 hours of experience through the Apprenticeship Pathway course of study that meets additional requirements.

Item 4 Ethics:

- The CFP candidate agrees to be bound by the CFP Board's Code of Ethics and Standards of Conduct, which puts clients' interests first; acknowledges the CFP Board's right to enforce standards through its Disciplinary Rules and Procedures; complies with the Financial Planning Practice Standards and determines what clients should reasonably expect when working with their financial planner. Further the candidate must complete a CFP Certification Application which requires disclosure of the CFP candidates background, including involvement in any criminal, civil, government, or self-regulatory proceeding or bankruptcy, customer complaint, termination or internal review conducted by the candidate's employer.

Item 5 Continuing Education:

- 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.
- The candidate must complete 30 hours of continuing education accepted by the CFP Board every two years, including two hours on the code of Ethics and other parts of the Standards of Professional Conduct in order to maintain competence and keep up with developments in the financial planning field. CFP professionals must agree to adhere to the high standards and practice outlined in the CFP Board's Code of Ethics and Standards of Conduct. The candidate must acknowledge the CFP Board's right to enforce its Disciplinary Rules and Procedures. The Code of Ethics and Standards of Conduct require that CFP Professionals provide financial planning by complying with the best interests of their clients.

Item 6 Certification Application:

- The CFP candidate must complete a Certification Application to (i) acknowledge voluntary adherence to the terms and conditions of certification with the CFP Board and (ii) disclose any involvement in criminal and civil proceedings, inquiries or investigations, bankruptcy filings, internal reviews and customer complaints. The CFP certification is a voluntary certification; no
- federal or state law or regulation requires financial planners to hold CFP certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients.

Item 7 Business Experience:

- Investment Adviser Representative, Robertson Wealth Management Houston, Texas, Present
- Investment Adviser Representative, Howard Capital, Inc., Oceanside, CA, 05/27/2020-10/22/2020
- Retirement Consultant, Johnson Wealth Inc. Oceanside, CA 05/16/2016-06/04/2020
- Retirement Consultant, Cleary Gull Inc. Milwaukee, WI, 07/18/2015-06/02/2016

Item 8 Professional Designations:

- Certified Financial Planner

Item 9 Disciplinary Information:

- None

Item 10 Other Business Activities:

- A. Investment Related Activities: None
- B. Non-Investment Related Activities: None

Item 11 Additional Compensation:

- None, Mr. McGill's annual compensation is based, in part, on the amount of assets under management that Mr. McGill introduces to Robertson Wealth Management.

Item 12 Supervision:

- Mr. McGill is supervised by the CEO/Managing Member of Robertson Wealth Management. Supervision includes the review of transactions for clients' accounts to determine the transactions are consistent with the clients' stated investment objectives and that transactions are in the best interest of the client.