

# ROUND TABLE

## WEALTH MANAGEMENT

### SEC FORM ADV PART 2A - DISCLOSURE BROCHURE

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This brochure provides information about the qualifications and business practices of Round Table Services, LLC, d/b/a Round Table Wealth Management, an investment adviser registered with the United States Securities and Exchange Commission (the "SEC"). If you have any questions about the contents of this brochure, please contact Bruce Hyde at [bruce@roundtablewealth.com](mailto:bruce@roundtablewealth.com) or at (908)374-2573. The information in this brochure has not been approved or verified by the SEC or by any state securities authority.

Additional information about Round Table Wealth Management also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Registration with the SEC does not imply a certain level of skill or training.

## ITEM 2 Material Changes

Since the filing of our last annual updating amendment, dated March 8, 2022, RTWM has made the following material changes to this brochure:

- **Item 4 - Advisory Business**
  - Updated RTWM Ownership—previous majority owner, Steven Giacona, transferred a portion of his ownership to Fontana Holdings LLC which is owned 100% by Steven Giacona.

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## ITEM 4 Advisory Business

### The Firm

Round Table Wealth Management (“RTWM”, “RTS”, or the “Firm”) primarily serves high net worth individuals and families. RTWM was founded in 1999 by Steven Giacona who is the firm’s Managing Partner. Fontana Holdings LLC (Giacona Affiliate) is now the majority owner, which is owned 100% by Steven Giacona. Steven Giacona, Robert Davis, Bruce Hyde and Mariella Foley are the four partners of the firm (each a “Partner”, and collectively the “Partners”). The Firm’s Chief Compliance Officer (“CCO”) is Bruce Hyde. RTWM maintains four office locations, Westfield, NJ, New York, NY, Boca Raton, FL and Bend, OR. RTWM provides its clients with both Investment Advisory (“IA”) and Financial Advisory (“FA”) services.

### Investment Advisory Services

RTWM provides IA services in accordance with the investment objective(s) of the client. Please see Item 16 for more information to understand the differences. Each client’s financial situation, risk tolerance, and goals are considered in developing an investment plan. These are generally memorialized in an Investment Policy Statement (“IPS”) that guides investment implementation.

Investment assets are allocated primarily to independent managers across several asset classes. This may include allocations to equities, fixed income, alternative investments, real estate, private equity and other asset classes. Depending on the size and nature of the relationship, allocations may be directed to independent managers through separately managed accounts (“SMAs”), private funds, exchange traded funds (“ETFs”), and/or mutual funds. RTWM may offer advice on individual securities.

IA services may be provided on either a discretionary or a non-discretionary basis. As of March 31, 2022, RTWM had a total of \$1.60 billion in assets under management. This total is comprised of \$1.430 billion in discretionary assets and \$170 million in non-discretionary assets.

### Financial Advisory (FA) Services

RTWM provides a broad range of FA services. The Firm advises on wealth transfer and estate planning, income tax, asset allocation, charitable planning and philanthropy, retirement, insurance, education, and other areas. The client is free to accept or reject RTWM’s recommendations. RTWM’s recommendations may be implemented, at CLIENT’s sole discretion, with the corresponding professional adviser(s) (i.e. broker, accountant, attorney, etc.) of client’s choosing. A conflict of interest exists if RTWM recommends itself to implement such recommendations.

RTWM does not participate in any wrap fee programs.

### IRA Rollover Recommendations

Effective December 20, 2021 (or such later date as the US Department of Labor (“DOL”) Field Assistance Bulletin 2018-02 ceases to be in effect), for purposes of complying with the DOL’s Prohibited Transaction Exemption 2020-02 (“PTE 2020-02”) where applicable, we are providing the following acknowledgment to you.

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule’s provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

We benefit financially from the rollover of your assets from a retirement account to an account that we manage or provide investment advice, because the assets increase our assets under management and, in turn, our advisory fees. As a fiduciary, we only recommend a rollover when we believe it is in your best interest.

## ITEM 5 Fees and Compensation

### Investment Advisory Services

#### Discretionary IA Services

The Firm's fees for discretionary IA services are based upon the value of the assets that RTWM oversees. The fees are payable quarterly in arrears or in advance and are calculated based upon the value of the assets in the accounts on the last business day of each calendar quarter or as a fixed fee. The fees that are charged are on gross asset value at the end of the quarter. This excludes any margin balances, if applicable. Upon termination of agreement, any prepaid, unearned fees will be promptly refunded. All new clients are synchronized to calendar quarters and partial quarters will be pro-rated based on actual days in the quarter. Fees will be prorated for significant contributions or withdrawals during a period, as appropriate.

Tier	Rate
First \$1,600,000	1.25%
Next \$3,400,000	0.90%
Next \$5,000,000	0.70%
Over \$10,000,000	0.45%

RTWM may negotiate a fee related to performance if elected by the client and agreed to by RTWM, and if the client qualifies for such an arrangement under Section 205(a)(1) of the Investment Advisers Act of 1940 (the "Investment Advisers Act"). Such performance fee shall be governed by a separate agreement between the client and RTWM.

The Firm's standard annual fee for discretionary IA services is below, subject to a \$10,000 annual minimum: The Firm reserves the right to negotiate fees, as appropriate. Some clients pay more or less than others depending on certain factors. The fees that RTWM charges for

IA services are specified in an agreement between RTWM and each individual client. Clients can choose to have discretionary IA fees either automatically debited from their custodial accounts or separately invoiced. In addition to the advisory fees paid to RTWM, clients will pay additional fees and expenses to other financial institutions, such as custodians, broker-dealers, and third-party managers which could include, as applicable, brokerage commissions and other transaction costs, management and other fees charged by third-party managers, fees charged by mutual funds and ETFs (including, without limitation, 12b-1 fees, operating expenses, and other fees and expenses) as reflected in the prospectuses for such mutual funds and ETFs, fees and expenses associated with investments in private funds (as reflected in the offering documents for such private funds), reporting charges, account maintenance fees, wire fees, taxes, and other fees and expenses.

#### Private Funds

As described in Item 10 below, Steven Giacona and Robert Davis (partners of RTWM) are members of CV Management GP, LLC ("CVGP") the general partner SPV for Countervailing Private Equity Fund, LP ("CVPE"), a private equity fund of funds. CVGP, as general partner of CVPE, has engaged RTWM as the investment adviser to CVPE, and has engaged the services of Rokit to provide fund accounting, investor reporting, and tax preparation services for CVPE. Rokit is paid a separate quarterly administration fee directly by the fund per contract terms.

Other expenses which may be incurred by CVPE but not paid to RTWM may include the costs of buying and selling securities (e.g. trading commissions), custodial, transaction, tax preparation, audit, compliance, other administrative fees, and investment management fees paid to independent managers, private investment funds, ETFs, and mutual funds.

For IA clients, RTWM does not receive any additional investment advisory compensation from the CVPE since the client's IA fee includes CVPE as an investment vehicle. For Non-IA Clients who invest in CVPE, RTWM charges a fee of 0.75% (75bps) per annum based on committed capital. CVGP also receives a performance-based fee from all partners of CVPE after each investor receives 100% of their initial capital plus a preferred return of 8%. Investors will have their CVPE fees collected as part of capital calls or separately invoiced.

CVPE is closed to new investors.

#### Non- Discretionary IA Services

The Firm's fees for non-discretionary IA services may be based upon the above fee schedule, a different fee schedule, or a separately negotiated quarterly retainer. The fees are payable quarterly in arrears or in advance and are calculated based upon the value of the

assets in the accounts on the last business day of each calendar quarter or as a fixed fee. Upon termination of agreement, any prepaid, unearned fees will be promptly refunded. All new clients are synchronized to calendar quarters and partial quarters will be prorated based on actual days in the quarter. Fees will be prorated for significant contributions or withdrawals during a period, as appropriate. Clients can choose to have non-discretionary IA fees either automatically debited from their custodial accounts or separately invoiced.

#### **Other**

RTWM and/or its employees do not accept compensation, including sales charges, service fees, rebates, or commissions from any person, manager, or fund for the sale of securities or other investment products.

As described in Item 10 below, RTWM is a minority member of Harmony Capital Associates, LLC, the general partner and investment adviser to Harmony Capital Management, LP, ("Harmony"), a private equity fund of funds. RTWM does not receive any management or referral fees from Harmony. As a member of the general partner, the Firm may receive an incentive fee based upon the underlying performance of Harmony after investors are returned 100% of their investment capital, plus a preferred return of 6%, as stated in the offering documents. This fund is closed to new investors.

### **Financial Advisory Services**

The Firm's FA services compensation is based upon the complexity of the engagement and the time necessary to complete the project. Services are invoiced quarterly in advance for the duration of the engagement. Upon termination of agreement, any prepaid, unearned fees will be promptly refunded. RTWM generally requires a minimum annual fee of \$7,500 per client for FA services. The fees that RTWM charges for FA services are specified in an FA agreement between RTWM and each individual client and include a schedule of agreed upon services to be rendered. Clients can choose to have FA fees either automatically debited from their custodial accounts or separately invoiced.

### **ITEM 6 Performance-Based Fees and Side-by-Side Management**

RTWM and its investment professionals provide IA services to multiple portfolios for multiple clients. Fees and compensation are described in Item 5 above.

RTWM has adopted policies and procedures intended to address potential conflicts of interest that may arise through the normal course of business.

### **ITEM 7 Types of Clients**

RTWM generally provides IA and FA services to high net worth individuals and families, trusts, estates, charitable organizations including family foundations, pensions and profit sharing plans and corporations. RTWM also acts as the investment adviser to one private fund described above.

Generally, RTWM imposes a minimum annual fee of \$10,000 for discretionary IA services and a minimum annual fee of \$7,500 for FA services. RTWM reserves the right to waive such minimums in its sole and absolute discretion.

### **ITEM 8 Methods of Analysis, Investment Strategies and Risk of Loss**

#### **Methods of Analysis**

RTWM primarily uses independent managers to implement investment recommendations. The Firm hires, monitors, and terminates managers as needed on behalf of the Firm's clients. When determining an appropriate manager, fund, or investment, the Firm reviews and considers many factors including, historical returns, volatility, manager experience, style, drawdowns, turnover, and operational procedures. The Firm generally conducts both statistical screenings and in-person meetings prior to engaging the manager.

The Firm reviews performance data and conducts update calls with each manager at least quarterly. RTWM may terminate managers when they do not meet performance objectives, they experience significant changes in management, they demonstrate an inability to alter their views given changing markets, ineffectively manage risk, drift from their stated style mandate and other factors.

### **Investment Strategies**

RTWM allocates assets across a broad range of investment categories and strategies in order to achieve the desired level of diversification and to meet client objectives for risk and return.

- Fixed Income - municipal and government bonds; investment grade and non-investment grade corporate bonds
- Equities - U.S. large, mid, and small cap; international developed and emerging markets
- Other - asset classes that have low correlation to traditional fixed income and equities such as global macro, high yield debt, master limited partnerships, commodities, and real estate
- Alternatives - hedge funds, hedge fund of funds, direct private equity, private equity funds, and private equity fund of funds.

### **Risk of Loss**

Investing in financial markets always involves the risk of loss which investors should understand and be prepared to bear. Fixed Income securities may, for example, incur loss due to a rise in interest rates or a decrease in credit quality. Equities may decrease in value due to a reduction in a dividend or a failure to meet earnings forecast or for an unrelated market reaction. Alternative assets may suffer from trading losses and bear an additional risk of illiquidity. In addition, risks to alternative assets are unique to each particular investment. Clients should review the offering memorandum for each alternative investment for additional discussion of the risks involved.

RTWM manages these risks in several ways. Diversification is the primary method for managing risk. Quantitative and qualitative analysis of the investment managers or investments to whom the Firm allocates client assets also assist us in managing risk.

## **ITEM 9 Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of the firm or the integrity of the firm's management in this item.

RTWM and its management persons have no legal or disciplinary events to report.

## **ITEM 10 Other Financial Industry Activities and Affiliations**

### **Private Funds**

As described in Item 5 above, RTWM acts as the investment adviser to CVPE. CVPE is a private fund formed for the purpose of allowing IA investors to access a diversified group of investment managers within a certain asset class, without being impacted by an investment managers minimum account size. The assets held by CVPE are primarily allocated to independent managers using separate accounts or commingled funds. Investors are required to review the offering memorandum, which outlines all disclosures and conflicts of interest, of the private fund and execute a subscription agreement prior to investing.

Fees and compensation for CVPE are described in Item 5 above.

### **Countervailing Private Equity Fund, LP**

As described in Item 5 above, Steven Giacona and Robert Davis (partners of RTWM) are members of CV Management GP, LLC ("CVGP"), the general partner to Countervailing Private Equity Fund, LP ("CVPE"), which is a private equity fund of funds.

Steven and Robert's right to participate in the profits of CVPE creates a conflict of interest because RTWM has an economic incentive to advise clients to invest in CVPE. In light of this conflict of interest, the CCO reviews client accounts in order to confirm that any allocations of capital to CVPE are consistent with the client's investment objectives. CVPE invests in diversified private

equity funds and other investments as determined by the general partner. Clients are required to review the offering memorandum, which outlines all disclosures and conflicts of interest, and execute a subscription agreement prior to investing. This fund is closed to new investors.

#### **Harmony Capital Management, LP**

As described in Item 5 above, RTWM is a minority member of Harmony Capital Associates, LLC, the general partner and investment adviser to Harmony Capital Management, LP, (“Harmony”), a private equity fund of funds. RTWM does not receive any management or referral fees from Harmony. As a member of the general partner, the Firm may receive an incentive fee based upon the underlying performance of Harmony after investors are returned 100% of their investment capital, plus a preferred return of 6%, as stated in the offering documents.

RTWM’s right to participate in the profits of Harmony creates a conflict of interest because RTWM has an economic incentive to advise clients to invest in Harmony. In light of this conflict of interest, the CCO reviews client accounts in order to confirm that any allocations of capital to Harmony are consistent with the client’s investment objectives. Harmony invests in diversified private equity funds and other investments as determined by the general partner. Clients are required to review the offering memorandum, which outlines all disclosures and conflicts of interest, and execute a subscription agreement prior to investing. This fund is closed to new investors.

#### **Other Investment Managers**

RTWM recommends and selects other investment managers for the Firm’s clients and the Firm does not receive any compensation either directly or indirectly from those advisers other than the relationships mentioned above.

#### **Insurance Products**

Westfield Risk Solutions LLC, which is owned by two partners of RTWM, works with insurance brokers and agents on behalf of our clients to meet their insurance needs. In its capacity, Westfield Risk Solutions LLC may receive separate, yet customary compensation for insurance product sales. As a result of the ownership by the two partners of RTWM in Westfield Risk Solutions LLC, a conflict of interest exists when RTWM recommends Westfield Risk Solutions LLC to Clients for their insurance needs because this could increase the compensation received by the two partners of RTWM. However, clients are under no obligation contractually or otherwise to purchase insurance products through our firm, Westfield Risk Solutions LLC, any associated employee, or referred insurance company.

## **ITEM 11 Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

#### **Code of Ethics and Personal Trading**

RTWM has adopted a Code of Ethics for all employees of the Firm describing the Firm’s high standards of business conduct, fiduciary duty to the Firm’s clients, and rules surrounding personal securities trading by the Firm’s employees. All of the Firm’s employees are also required to comply with applicable federal securities laws.

The Firm’s code states that no employee shall prefer his/her own interests to those of the Firm’s clients. The Firm also prohibits the use of material non-public information. Personal trading and any private investment activity by employees require pre-clearance by the CCO, or designee, for all investments except open-ended mutual funds. All employees must provide annual securities holdings reports and quarterly transaction reports of all reportable transactions (including those of family members sharing a home) to the Firm’s CCO, unless an exception is granted. These reports are reviewed by the Firm’s CCO and made available to regulatory agencies.

A copy of the Firm’s Code of Ethics is available to clients and prospective clients upon request to the Firm’s CCO, Bruce Hyde, by email at [bruce@roundtablewealth.com](mailto:bruce@roundtablewealth.com), or by telephone at (908) 374-2573.

#### **Participation or Interest in Client Transactions**

RTWM and/or its Partners may have a financial interest in business entities or private funds that have been, and may continue to be, recommended to clients as discussed in Item 10 above. These practices may create a conflict of interest because RTWM or its Partners may have an incentive to recommend securities to clients based on its own financial interests, rather than solely the interests of a client. All such recommendations are made in accordance with the investment objectives of the client and only if such recommendations are in the best interests of clients.



RTWM employees may purchase, sell, or hold positions in securities recommended to clients, including purchasing securities that are being sold for clients and vice versa. Employees may also invest in CVPE. Such practices may present a conflict where RTWM or its Partners are in a position to trade in a manner that could adversely affect clients (e.g., place their own trades before or after client trades are executed in order to benefit from any price movements due to the clients' trades). In addition to affecting RTWM's or its Partners' objectivity, these practices by RTWM or its Partners may also harm clients by adversely affecting the price at which the clients' trades are executed. RTWM has adopted the following procedures in an effort to minimize such conflicts: RTWM requires its employees to pre-clear all transactions in their personal accounts with the CCO, or designee, who may deny permission to execute the transaction if such transaction will have any adverse economic impact on one of its clients. Almost all employee transactions are de Minimis and have no impact on client trades. All of RTWM's Partners and employees are required to disclose their securities transactions and holdings on a quarterly basis.

## ITEM 12 Brokerage Practices

While Clients may choose their preferred custodian or brokerage firm, RTWM generally recommends that the Firm's clients and independent managers (where possible) maintain their accounts with TD Ameritrade Institutional ("TDAI"), Charles Schwab & Co. ("Schwab"), Fidelity Investments ("Fidelity"), or JP Morgan Private Bank ("JPMorgan").

In addition to custody and brokerage, JPMorgan serves the needs of clients requiring additional products and/or services such as derivatives, lending, banking and fiduciary services. In addition to custody and brokerage, TDAI, Schwab and Fidelity provide fiduciary services. JPMorgan is generally more expensive than TDAI, Schwab and Fidelity for basic custody and brokerage, but offers a pure bank custody platform as opposed to solely a brokerage platform as offered by TDAI, Schwab and Fidelity.

### Broker Selection and Best Execution

Factors RTWM considers in recommending a broker-dealer/custodian to clients include financial strength, reputation, trade execution, pricing, integration efficiencies, and fairness in resolving disputes, research, and service. In selecting a broker-dealer to execute transactions (or series of transactions) and determining the reasonableness of the broker-dealer's compensation, RTWM need not solicit competitive bids and does not have an obligation to seek the lowest available commission cost. It is not RTWM's practice to negotiate "execution only" commission rates, therefore, a client may be deemed to be paying for research, brokerage, or other services provided by a broker-dealer, which are included in the commission rate.

RTWM reviews and evaluates broker-dealer costs and other factors periodically to determine their competitiveness.

RTWM does not maintain any formal soft dollar arrangements but does receive and utilize the platform benefits offered by the custodians/broker-dealers that are generally available to all institutions regardless of asset size or client trading volume. RTWM does not maintain any formal soft dollar arrangements but does receive and utilize the platform benefits offered by the custodians/broker-dealers that are generally available to all institutions regardless of asset size or client trading volume.

### Directed Brokerage and Aggregated Trades

A client may direct RTWM to use a particular broker-dealer to execute some or all transactions for the account (subject to the Firm's right to decline and/or terminate the engagement). As a result, the client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case.

Transactions for each client account generally will be executed independently, unless the Firm decides to purchase or sell the same securities for several clients at approximately the same time. RTWM may (but is not obligated to) combine or "batch" such orders to obtain best execution, to negotiate more favorable commission rates or to allocate equitably among the Firm's client's differences in prices and commissions or other transaction costs that might have been obtained had such orders been placed independently. Such aggregation may enable RTWM to obtain for clients a more favorable price based upon the volume of a particular transaction. However, in cases where the client has negotiated the commission rate directly with the broker, RTWM will not be able to obtain more favorable commission rates based on an aggregated trade. In such cases, the client will be precluded from receiving the benefit of any possible commission discounts that might otherwise be available as a result of the aggregated trade.

In cases where trading or investment restrictions are placed on a client's account, RTWM may be precluded from aggregating that client's transaction with others. In such a case, the client may pay a higher commission rate and/or receive less favorable prices than clients who are able to participate in an aggregated order. When an aggregated order is completely filled, RTWM allocates

the securities purchased or proceeds of sale pro rata among the participating accounts, based on the purchase or sale order. Adjustments or changes may be made under certain circumstances, such as to avoid odd lots or excessively small allocations. If the order at a particular broker is filled at several different prices, through multiple trades, generally all such participating accounts will receive the average price and pay the average commission, subject to odd lots, rounding, and market practice. If an aggregated order is only partially filled, RTWM's procedures provide that the securities or proceeds be allocated in a manner deemed fair and equitable to clients. Depending on the investment strategy pursued and the type of security, this may result in a pro rata allocation to all participating clients.

#### **Advisor Panel Disclosure**

Steven Giacona serves on the TD Ameritrade Institutional President's Council ("Council"). The Council consists of former Advisor Panel Members who are independent investment advisors that inform and provide feedback to TD Ameritrade Institutional ("TDAI") on issues relevant to the independent advisor community. Advisor has been invited to serve on the Council for an ongoing term by TDAI. TD Ameritrade, Inc. ("TD Ameritrade") does not compensate advisor for serving on the Council but TDAI may pay or reimburse advisor for the travel, lodging and meal expenses advisor incurs in attending in person Advisor Panel meetings. The potential benefits received by advisor or its personnel by serving on the Council do not depend on the amount of brokerage transactions directed to TDAI.

### **ITEM 13 Review of Accounts**

#### **Investment Advisory Clients**

Partners of the Firm and/or Wealth Managers, who are in charge of client relationships, review accounts on an ongoing basis, at least quarterly. The review process includes an analysis of the portfolio in accordance with the goals and objectives of the client and a transactional review for the period under observation. Reviews with clients typically include a discussion of the economy, financial markets, and the performance of client accounts. Clients are encouraged to advise us of any changes in their financial situation.

RTWM provides all IA clients with quarterly reports showing a list of assets and investment results. In addition, clients receive account and transaction information directly from the custodians and/or third party administrators and may receive reports from individual managers.

#### **Financial Advisory Clients**

Advisory matters are reviewed on an ongoing basis, as appropriate. This may involve correspondence, financial schedules, meetings, and/or phone calls.

### **ITEM 14 Client Referrals and Other Compensation**

RTWM participates in the institutional advisor program (the "Program") offered by TD Ameritrade Institutional. TD Ameritrade Institutional is a division of TD Ameritrade Inc., member FINRA/SIPC ("TD Ameritrade"), an unaffiliated SEC-registered broker-dealer and FINRA member. TD Ameritrade offers to independent investment advisors services which include custody of securities, trade execution, clearance, and settlement of transactions. Advisor receives some benefits from TD Ameritrade through its participation in the Program.

As disclosed above, RTWM participates in TD Ameritrade's institutional customer program and RTWM may recommend TD Ameritrade to Clients for custody and brokerage services. There is no direct link between RTWM's participation in the program and the investment advice it gives to its Clients, although RTWM receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving RTWM participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to RTWM by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by RTWM's related persons. Some of the products and services made available by TD Ameritrade through the program may benefit RTWM but may not benefit its Client accounts. These products or services may assist

RTWM in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help RTWM manage and further develop its business enterprise. The benefits received by RTWM or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, RTWM endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by RTWM or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the RTWM's choice of TD Ameritrade for custody and brokerage services.

RTWM may receive client referrals from TD Ameritrade through its participation in TD Ameritrade AdvisorDirect. In addition to meeting the minimum eligibility criteria for participation in AdvisorDirect, RTWM may have been selected to participate in AdvisorDirect based on the amount and profitability to TD Ameritrade of the assets in, and trades placed for, client accounts maintained with TD Ameritrade. TD Ameritrade is a discount broker-dealer independent of and unaffiliated with RTWM and there is no employee or agency relationship between them. TD Ameritrade has established AdvisorDirect as a means of referring its brokerage customers and other investors seeking fee-based personal investment management services or financial planning services to independent investment advisors. TD Ameritrade does not supervise RTWM and has no responsibility for RTWM's management of client portfolios or RTWM's other advice or services. RTWM pays TD Ameritrade an on-going fee for each successful client referral. This fee is based on the referred client average business day balance, billed monthly, fee not to exceed 25% of the advisory fee that the client pays to advisor ("Solicitation Fee"). RTWM will also pay TD Ameritrade the Solicitation Fee for a referred client's family members, including a spouse, child or any other immediate family member who resides with the referred client and hired RTWM on the recommendation of such referred client. RTWM will not charge clients referred through AdvisorDirect any fees or costs higher than its standard fee schedule offered to its clients or otherwise pass Solicitation Fees paid to TD Ameritrade to its clients. For information regarding additional or other fees paid directly or indirectly to TD Ameritrade, please refer to the TD Ameritrade AdvisorDirect Disclosure and Acknowledgement Form.

RTWM's participation in AdvisorDirect raises potential conflicts of interest. TD Ameritrade will most likely refer clients through AdvisorDirect to investment advisors that encourage their clients to custody their assets at TD Ameritrade and whose client accounts are profitable to TD Ameritrade. Consequently, in order to obtain client referrals from TD Ameritrade, RTWM may have an incentive to recommend to clients that the assets under management by RTWM be held in custody with TD Ameritrade and to place transactions for client accounts with TD Ameritrade. In addition, RTWM has agreed not to solicit clients referred to it through AdvisorDirect to transfer their accounts from TD Ameritrade or to establish brokerage or custody accounts at other custodians, except when its fiduciary duties require doing so. RTWM's participation in AdvisorDirect does not diminish its duty to seek best execution of trades for client accounts.

Other than the compensation described in Items 5, 6, 10 and 12, RTWM does not receive an economic benefit from anyone other than its clients.

The Advisor engages independent solicitors to provide client referrals. If a client is referred to us by a solicitor, this practice is disclosed to the client in writing by the solicitor and the Advisor pays the solicitor out of its own funds—specifically, the Advisor generally pays the solicitor a portion of the advisory fees earned for managing the capital of the client or investor that was referred. The use of solicitors is strictly regulated under applicable federal and state law. The Advisor's policy is to fully comply with the requirements of Rule 206(4)-3, under the Investment Advisers Act of 1940, as amended, and similar state rules, as applicable.

The Advisor may receive client referrals from Zoe Financial, Inc through its participation in Zoe Advisor Network (ZAN). Zoe Financial, Inc is independent of and unaffiliated with the Advisor and there is no employee relationship between them. Zoe Financial established the Zoe Advisor Network as a means of referring individuals and other investors seeking fiduciary personal investment management services or financial planning services to independent investment advisors. Zoe Financial does not supervise the Advisor and has no responsibility for the Advisor's management of client portfolios or the Advisor's other advice or services. The Advisor pays Zoe Financial an on-going fee for each successful client referral. This fee is usually a percentage of the advisory fee that the client pays to the Advisor ("Solicitation Fee"). The Advisor will not charge clients referred through Zoe Advisor Network any fees or costs higher than its standard fee schedule offered to its clients. For information regarding additional or other fees paid directly or indirectly to Zoe Financial Inc, please refer to the Zoe Financial Disclosure and Acknowledgement Form.

RTWM receives client referrals from Charles Schwab & Co., Inc. ("Schwab") through RTWM's participation in Schwab Advisor Network® ("the Service"). The Service is designed to help investors find an independent investment advisor. Schwab is a brokerdealer independent of and unaffiliated with RTWM. Schwab does not supervise Advisor and has no responsibility for RTWM management of clients' portfolios or Advisor's other advice or services. RTWM pays Schwab fees to receive client referrals through the Service. RTWM's participation in the Service raises potential conflicts of interest described below.

RTWM pays Schwab a Participation Fee on all referred clients' accounts that are maintained in custody at Schwab and a separate one-time Transfer Fee on all accounts that are transferred to another custodian. The Transfer Fee creates a conflict of interest that encourages RTWM to recommend that client accounts be held in custody at Schwab. The Participation Fee paid by RTWM is a percentage of the value of the assets in the client's account. RTWM pays Schwab the Participation Fee for so long as the referred client's account remains in custody at Schwab. The Participation Fee is paid by RTWM and not by the client. RTWM has agreed not to charge clients referred through the Service fees or costs greater than the fees or costs RTWM charges clients with similar portfolios who were not referred through the Service.

The Participation and Transfer Fees are based on assets in accounts of RTWM's clients who were referred by Schwab and those referred clients' family members living in the same household. Thus, RTWM will have incentives to recommend that client accounts and household members of clients referred through the Service maintain custody of their accounts at Schwab.

## ITEM 15 Custody

RTWM does not provide custodial services to its clients. Client assets are held in custody by unaffiliated banks, registered broker-dealers, or other "qualified custodians", per Item 12 above. Clients should receive statements at least quarterly from these custodians. RTWM urges clients to carefully review such statements and compare them to the reports that the Firm may provide. RTWM reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Although RTWM does not provide custodial services to clients, there are instances in which the Firm is pursuant to the SEC's Custody Rule, which requires Firms that meet certain criteria to disclose custody of client assets on Form ADV Part I and file a Form ADV-E in conjunction with the annual surprise audit requirement. In RTWM's case, the following criteria meet the SEC's Custody Rule and require an annual surprise examination by an Independent Accounting Firm who is a member of the Public Company Accounting Oversight Board:

- Advisor serving as Trustee or Executor for Client Accounts (non-family member)
- Access to online credentials/logins for client accounts
- Standing Letters of Authorization, which do not meet the SEC's exemptions

RTWM claims custody of these accounts for reporting purposes and is subject to the surprise examination and Form ADV-E filing annually.

All CVPE assets are held in custody by unaffiliated banks, registered broker-dealers, or other "qualified custodians". However, RTWM has access to CVPE accounts since it serves as the investment advisor of the Fund. Limited partners (or members or owners) will not receive statements from the custodian, but will receive statements at least quarterly from the Funds' third-party administrator.

In addition, CVPE is subject to an annual audit and the audited financial statements are distributed to each limited partner (or member or owner). The audited financial statements will be prepared in accordance with Generally Accepted Accounting Principles ("GAAP") and distributed within 180 days of the CVPE fiscal year end.

## ITEM 16 Investment Discretion

RTWM provides investment advisory services on a discretionary basis to clients. Please see Item 4 and 5 for a description of any limitations clients may place on the Firm's discretionary authority. RTWM also accepts non-discretionary accounts. Client approval is needed before recommendations on nondiscretionary accounts are implemented.

Prior to assuming discretion in managing a client's assets, RTWM enters into an IA agreement or other agreement with the client that sets forth the scope of the Firm's discretion.

Unless otherwise instructed or directed by a discretionary client, RTWM has the authority to determine (i) the securities to be purchased and sold for the client account (subject to restrictions on its activities set forth in the applicable IA agreement and any written investment guidelines); and (ii) the amount of securities to be purchased or sold for the client account. Because of the

differences in client investment objectives and strategies, risk tolerances, tax status, and other criteria, there may be differences among clients in invested positions and securities held. RTWM Partners and Wealth Managers may consider the following factors, among others, in allocating securities among clients: (i) client investment objectives and strategies; (ii) client risk profiles; (iii) tax status and restrictions placed on a client's portfolio by the client or by applicable law; (iv) size of the client account; (v) nature and liquidity of the security to be allocated; (vi) size of available position; (vii) current market conditions; and (viii) current account liquidity, account requirements for liquidity and timing of cash flows. Although it is RTWM's policy to allocate investment opportunities to eligible client accounts on a pro rata basis (based on the value of the assets in each participating account relative to value of the assets of all participating accounts), these factors may lead RTWM Partners and Wealth Managers to allocate securities to client accounts in varying amounts. Even client accounts that are typically managed on a pari passu basis may from time to time receive differing allocations of securities based on total assets of each account eligible to invest in the particular investment type (e.g., equities) divided by the total assets of all accounts eligible to invest in the particular investment.

Securities acquired by RTWM for its clients through a limited offering will be allocated pursuant to the procedures set forth in RTWM's allocation policy. The policy provides that RTWM Partners and Wealth Managers will determine the proposed allocation of limited offering securities after considering the factors described above with respect to general allocations of securities and determining those client accounts eligible to hold such securities. Eligibility will be based on the legal status of the client and the client's investment objectives and strategies.

RTWM may effect cross transactions between discretionary client accounts, except as otherwise noted below. Cross transactions enable RTWM to effect a trade between two clients for the same security at a set price, thereby possibly avoiding an unfavorable price movement that may be created through entrance into the market and saving commission costs for both accounts. Cross transactions include rebalancing transactions that are undertaken so that, after withdrawals or contributions have occurred, the portfolio compositions of similarly managed accounts remain substantially similar. RTWM has a potentially conflicting division of loyalties and responsibilities regarding both parties to cross transactions. Cross transactions between client accounts are not permitted if they would constitute principal trades unless client consent has been obtained based upon written disclosure to the client of the capacity in which RTWM or its affiliates will act. In addition, cross transactions are not permitted for benefit plan or other similar accounts that are subject to ERISA.

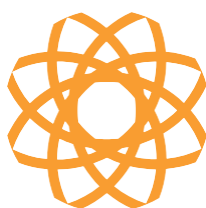
If it appears that a trade error has occurred, RTWM will review the relevant facts and circumstances to determine an appropriate course of action. To the extent that trade errors and breaches of investment guidelines and restrictions occur, RTWM's error correction procedure is to ensure that clients are treated fairly and, following error correction, are in the same position they would have been if the error had not occurred. RTWM has discretion to resolve a particular error in any appropriate manner that is consistent with the above stated policy.

## **ITEM 17 Voting Client Securities**

RTWM does not exercise discretionary proxy voting authority with respect to any client securities held in client owned accounts. The Firm discloses in its standard advisory contract that RTWM and/or the client shall correspondingly instruct each custodian of the assets to forward copies of all proxies and shareholder communications relating to the client's investment assets to the client or designated third party investment manager. As a matter of convenience for the client, the Firm may vote proxies upon the explicit instructions of a client. Records of such instructions and corresponding proxy votes will be maintained by RTWM.

## **ITEM 18 Financial Information**

RTWM has never filed for bankruptcy and is not aware of any financial condition that is expected to affect its ability to manage client accounts.



# ROUND TABLE

WEALTH MANAGEMENT

## SEC FORM ADV PART 2B - DISCLOSURE BROCHURE SUPPLEMENT

PUBLISHED: MARCH 2022

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[WWW.ROUNDTABLEWEALTH.COM](http://WWW.ROUNDTABLEWEALTH.COM)

This brochure supplement provides information about the above named individuals that supplements the Round Table Wealth Management brochure. You should have received a copy of that brochure. Please contact Bruce Hyde at [bruce@roundtablewealth.com](mailto:bruce@roundtablewealth.com) or at (908) 789-7310 if you did not receive the Round Table Wealth Management brochure or if you have any questions about the contents of this supplement. The information in this brochure has not been approved or verified by the SEC or by any state securities authority.

Additional information about Round Table Wealth Management also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Registration with the SEC does not imply a certain level of skill or training.



## Steven J. Giacona

### Educational Background & Business Experience

Born 1964

**Education and Designations:** Marist College: 1986 BS Accounting  
Fordham University: 1993 MS Taxation  
New York State Certified Public Accountant (CPA1): 1988

**Business Background:** Round Table Management, Managing Member: 10/1999 to present  
CV Management GP, Member: 06/2012 to present  
Westfield Risk Solutions, LLC, Member: 03/2020 to Present

**Disciplinary Information:** There are no legal or disciplinary events to report.

**Other Business Activities:** In addition to his role with Round Table Management, Mr. Giacona is a Member of CV Management GP, LLC, the general partner to the Countervailing Private Equity Fund, LP. This is a pooled investment vehicle ("Fund") in which clients of our firm invest. Investors to whom the Fund is offered receive a private placement memorandum and other offering documents. Mr. Giacona is also a member of Westfield Risk Solutions, LLC. This is an entity that works with insurance agents and brokers on behalf of our clients to meet their insurance needs.

Please refer to Item 10 of the Round Table Management Firm Brochure for more information regarding this other financial industry activity.

**Additional Compensation:** As a Member of CV Management GP, LLC Mr. Giacona participates in the profits of the Countervailing Private Equity Fund, LP. This compensation is disclosed to investors in the Fund offering documents. As a member of Westfield Risk Solutions, LLC Mr. Giacona will receive additional compensation related to the sale of insurance products. This compensation is disclosed to clients.

**Supervision:** As RTWM's Managing Member, Mr. Giacona maintains ultimate responsibility for the company's operations. He is a member of the firm's Investment Committee that oversees all investment activities including investment decisions, operations, and review of accounts. Mr. Giacona can be reached directly by calling the telephone number on the cover of this brochure. In the supervision of our associated persons, advice provided is limited based on the restrictions set by RTWM, and by internal decisions as to the types of investments that may be included in client portfolios. We conduct periodic reviews of client holdings and documented suitability information to provide reasonable assurance that the advice provided remains aligned with each client's stated investment objectives and with our internal guidelines.

Mr. Giacona is supervised by Bruce Hyde, Chief Compliance Officer. Mr. Hyde can be reached at (908) 374-2573.



## Robert C. Davis

### Educational Background & Business Experience

Born 1970

**Education and Designations:** Southern Methodist University: 1992 BA History  
Southern Methodist University: 1997 MBA Finance/Accounting  
Chartered Financial Analyst (CFA): 2000  
Chartered Alternative Investment Analyst (CAIA): 2015

**Business Background:** Round Table Wealth Management, Chief Investment Officer:  
4/2006 to present  
CV Management GP, Member: 06/2012 to present

**Disciplinary Information:** There are no legal or disciplinary events to report.

**Other Business Activities:** In addition to his role with Round Table Management, Mr. Davis is a Member of CV Management GP, LLC, the general partner to the Countervailing Private Equity Fund, LP, a pooled investment vehicle ("Fund") in which clients of our firm invest. Investors to whom the Fund is offered receive a private placement memorandum and other offering documents.

Please refer to Item 10 of the Round Table Management Firm Brochure for more information regarding this other financial industry activity.

**Additional Compensation:** As a Member of CV Management GP, LLC Mr. Davis participates in the profits of the Countervailing Private Equity Fund, LP. This compensation is disclosed to investors in the Fund offering documents.

**Supervision:** As RTWM's Chief Investment Officer, Mr. Davis is responsible for setting the investment direction of the firm. He is a member of the firm's Investment Committee that oversees all investment activities including investment decisions, operations, and review of accounts. Mr. Davis can be reached directly by calling the telephone number on the cover of this brochure. In the supervision of our associated persons, advice provided is limited based on the restrictions set by RTWM, and by internal decisions as to the types of investments that may be included in client portfolios. We conduct periodic reviews of client holdings and documented suitability information to provide reasonable assurance that the advice provided remains aligned with each client's stated investment objectives and with our internal guidelines.

Mr. Davis is supervised by Bruce Hyde, Chief Compliance Officer. Mr. Hyde can be reached at (908) 374-2573.





## Bruce Hyde

### Educational Background & Business Experience

Born 1965

**Education and Designations:** Lafayette College: 1987 BA Economics and Business  
Seton Hall University: 1998 MS Taxation  
New Jersey Certified Public Accountant (CPA1): 1990

**Business Background:** Round Table Wealth Management, Wealth Advisor: 06/2012 to present  
Round Table Wealth management, Chief Compliance Officer:  
12/2016 to present  
Westfield Risk Solutions, Member: 03/2020 to Present

**Disciplinary Information:** There are no legal or disciplinary events to report.

**Other Business Activities:** In addition to his role with Round Table Management, Mr. Hyde is also a member of Westfield Risk Solutions, LLC. This is an entity that works with insurance agents and brokers on behalf of our clients to meet their insurance needs.

**Additional Compensation:** As a member of Westfield Risk Solutions, LLC Mr. Hyde will receive additional compensation related to the sale of insurance products. This compensation is disclosed to clients.

**Supervision:** As RTWM's Chief Compliance Officer, Mr. Hyde is involved in SEC compliance matters. As a Wealth Advisor, Mr. Hyde is integrally involved in the investment decision-making process. He is a member of the firm's Investment Committee that oversees all investment activities including investment decisions, operations, and review of accounts. Mr. Hyde can be reached directly by calling the telephone number on the cover of this brochure. In the supervision of our associated persons, advice provided is limited based on the restrictions set by RTWM, and by internal decisions as to the types of investments that may be included in client portfolios. We conduct periodic reviews of client holdings and documented suitability information to provide reasonable assurance that the advice provided remains aligned with each client's stated investment objectives and with our internal guidelines.

Mr. Hyde is supervised by Steven Giacona, Partner. Mr. Giacona can be reached at (212) 257-4368.



## Mariella Foley

### Educational Background & Business Experience

Born 1969

**Education and Designations:** Montclair State University: 1993 BS Business Administration  
CERTIFIED FINANCIAL PLANNER™ (CFP®): 1/28/2008  
Accredited Domestic Partnership Advisor (ADPA®): 6/21/2011  
Certified Divorce Financial Advisor (CDFA®): 9/11/2014

**Business Background:** Round Table Wealth Management, Wealth Advisor 10/2000 to present

**Disciplinary Information:** There are no legal or disciplinary events to report.

**Other Business Activities:** There are no other business activities to report.

**Additional Compensation:** There is no additional compensation to report.

**Supervision:** As the corporate secretary and Wealth Advisor for RTWM, Ms. Foley is integrally involved in the investment decision-making process for her clients. Ms. Foley can be reached directly by calling the telephone number on the cover of this brochure. In the supervision of our associated persons, advice provided is limited based on the restrictions set by RTWM, and by internal decisions as to the types of investments that may be included in client portfolios. We conduct periodic reviews of client holdings and documented suitability information to provide reasonable assurance that the advice provided remains aligned with each client's stated investment objectives and with our internal guidelines.

Ms. Foley is supervised by Bruce Hyde, Chief Compliance Officer. Mr. Hyde can be reached at (908) 374-2573.

### 1) Certified Public Accountant (CPA) Minimum Qualifications:

CPA is the statutory title of qualified accountants in the United States who have passed the Uniform Certified Public Accountant Examination and have met additional state education and experience requirements for certification as a CPA. In most U.S. states, only CPAs who are licensed are able to provide to the public attestation (including auditing) opinions on financial statements. In order to become a CPA in the United States, a candidate must sit for and pass the Uniform Certified Public Accountant Examination (Uniform CPA Exam), which is set by the American Institute of Certified Public Accountants and administered by the National Association of State Boards of Accountancy. In addition to the CPA exam, most states also require the completion of a special examination on ethics and that specific education and work experience minimums are met. CPAs are also required to take continuing education courses in order to renew their license. Requirements vary by state but the majority of states require 120 hours of CPE every 3 years with a minimum of 20 hours per calendar year.

### 2) Chartered Financial Analyst (CFA) Minimum Qualifications:

The Chartered Financial Analyst (CFA) designation is an international professional certification issued by the CFA Institute (formerly AIMR) to qualified candidates who complete a series of three examinations. To become a candidate for a CFA charter, candidates must meet one of the following requirements: 1) Have a bachelor's (or equivalent) degree, or; 2) Be in the final year of a bachelor's degree program, or; 3) Have four years of professional work experience (full time, but not necessarily investment related), or; 4) Have a combination of professional work and university experience that totals at least four years. Candidates may become a CFA Charterholder if they successfully pass three course exams, Levels I, II, and III and have four years of professional work experience in the investment decision-making process. The CFA Institute has stated that the average candidate may need approximately 250 hours of study for each of the three levels. The CFA curriculum includes these topic areas: Ethical and Professional Standards; Quantitative Methods (such as the time value of money, and statistical inference); Economics; Financial Reporting and Analysis; Corporate Finance; Equity Investments; Fixed Income Investments; Derivatives; Alternative Investments; and Portfolio Management and Wealth Planning. CFA Charterholders are also obligated to adhere to a strict Code of Ethics and Standards governing their professional conduct.

### 3) CERTIFIED FINANCIAL PLANNER™ (CFP®) Minimum Qualifications:

CFP® professionals must develop their theoretical and practical financial planning knowledge by completing a comprehensive course of study at a college or university offering a financial planning curriculum approved by CFP Board. CFP® practitioners must pass a comprehensive 6-hour CFP® Certification Examination that tests their ability to apply financial planning knowledge in an integrated format. Based on regular research of what planners do, the exam covers the financial planning process, tax planning, employee benefits and retirement planning, estate planning, investment management and insurance. CFP® professionals must have three years minimum experience in the financial planning process prior to earning the right to use the CFP® certification marks. As a result, CFP® practitioners possess financial counseling skills in addition to financial planning knowledge. As a final step to certification, CFP® practitioners agree to abide by a strict code of professional conduct, known as CFP Board's Code of Ethics and Professional Responsibility that sets forth their ethical responsibilities to the public, clients and employers. CFP Board also performs a background check during this process, and each individual must disclose any investigations or legal proceedings related to their professional or business conduct. CFP® professionals are required to complete 30 hours of CE every two years.

### 4) CERTIFIED DIVORCE FINANCIAL ADVISOR (CDFA®) Minimum Qualifications:

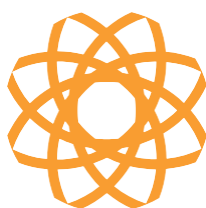
The role of a CDFA® professional is to address the special financial issues of divorce with data to help achieve equitable settlements. Divorce Financial Planning is the application of the discipline of financial planning to settlement strategies in divorce. The process requires the synthesis of tax, insurance, retirement and other areas of knowledge with their specific application to divorce. Individuals with a minimum of three years of professional experience in finance or divorce and a Bachelor's degree are eligible to enroll in the CDFA® Program. IDFA will accept ten years of professional experience from those candidates that do not have a Bachelor's degree. This includes experience as a financial professional, accountant, or matrimonial lawyer. Candidates must pass a comprehensive 4 hour exam which covers the following topics: overview of divorce laws and procedures, marital vs. separate property, pensions and retirement plans, options for marital home, fundamentals of child and spousal support, tax issues related to selling or transferring property, debt credit and bankruptcy. To assure continuing competency in tax codes, legislative and other ongoing developments in the field of divorce financial planning. CDFA® Professionals must report 15 hours of divorce-related continuing education every two years.

## 5) ACCREDITED DOMESTIC PARTNERSHIP ADVISOR<sup>SM</sup> (ADPA<sup>®</sup>) Minimum Qualifications:

Individuals who hold the ADPA<sup>®</sup> designation have completed a course of study encompassing wealth transfers, federal taxation, retirement planning, and planning for financial and medical end-of-life needs for domestic partners. Additionally, individuals must pass an end-of-course examination that tests their ability to synthesize complex concepts and apply theoretical concepts to real-life situations. Designees are required to complete 16 continuing education credits every two years in order to maintain the credential.

## 6) CHARTERED ALTERNATIVE INVESTMENT ANALYST (CAIA) Minimum Qualifications:

The Chartered Alternative Investment Analyst (CAIA) designation is an internationally recognized designation issued by the Chartered Alternative Investment Analyst Association, which was founded by the Alternative Investment Management Association (AIMA) and the Center for International Securities and Derivatives Markets (CISDM). A holder of the designation must complete two exams focused on alternative investments and must meet one of the following requirements: a bachelor's or equivalent degree and one year of business experience in the financial industry or four years of business experience in the financial industry.



# ROUND TABLE

WEALTH MANAGEMENT

## PRIVACY POLICY

PUBLISHED: MARCH 2022

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[WWW.ROUNDTABLEWEALTH.COM](http://WWW.ROUNDTABLEWEALTH.COM)

Should you have any questions regarding this policy, please contact your RTWM Wealth Manager or the RTWM Compliance Department at:

**Bruce Hyde**

Round Table Wealth Management

241 North Ave. W, Suite 300

Westfield, NJ 07090

(908) 789-7310 | [compliancedept@roundtablewealth.com](mailto:compliancedept@roundtablewealth.com)

## Privacy Policy

Pursuant to Regulation S-P adopted by the Securities and Exchange Commission, it is the policy of Round Table Wealth Management ("RTWM" or "Firm") to keep confidential nonpublic personal information ("information") pertaining to each current and former client. RTWM recognizes the privacy concerns of its clients and assures that the safeguarding of information is one of our highest priorities. RTWM provides this notice so that clients are aware of the kinds of information the Firm collects and the circumstances in which such information may be disclosed to third parties.

### Information RTWM May Collect

RTWM may collect the following information about the Firm's clients:

- Name and contact information
- Social security or taxpayer identification number
- Assets and income
- Account information including investment activities
- Investment objectives and risk tolerance
- Financial documents including tax returns, wills, trusts and other

documents RTWM may collect clients' information from the following sources:

- Account applications and other forms
- Correspondence between a client or service provider and RTWM; this may be written, electronic or telephonic

### How RTWM Handles Clients' Personal Information

RTWM does not sell information about clients to third parties. The information the Firm collects is not disclosed to anyone unless RTWM is:

- Authorized by the client to disclose information to individuals and/or entities that service the clients account(s) and have need for such information (e.g., attorney, accountant, insurance agent, account custodian, administrators, etc.); or
- Required to do so by judicial or regulatory process or otherwise permitted to do so in accordance with the parameters of Regulation S-P.

RTWM may contract with companies to perform services for us (e.g. independent auditors, administrative, and systems support). Where necessary, RTWM will disclose information the Firm has about clients to these third parties. In all such cases, we provide the third party with only the information necessary to carry out its assigned responsibilities and only for that purpose. We require these third parties to treat your private information with the same high degree of confidentiality that we do.

### How RTWM Protects the Firm's Clients' Information

Each employee of RTWM is aware of this Privacy Policy and has acknowledged the requirement to comply with this policy. In accordance with this policy, each employee has access to information to the extent reasonably necessary for them to perform services for the client, and to comply with applicable procedures and requirements. To protect client information from unauthorized use, RTWM uses security measures that comply with federal law, including computer safeguards and secured files and buildings.

<b>FACTS</b>	<b>WHAT DOES ROUND TABLE WEALTH MANAGEMENT (“RTWM”) DO WITH YOUR PERSONAL INFORMATION?</b>
<b>WHY?</b>	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
<b>WHAT?</b>	The types of personal information we collect and share depend on the product or service you have with us. This information can include: <ul style="list-style-type: none"> <li>• Social security number</li> <li>• Income</li> <li>• Wire transfer instructions</li> <li>• Assets</li> <li>• Transaction history</li> <li>• Account Balances</li> </ul>
<b>HOW?</b>	All financial companies need to share customers’ personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers’ personal information; the reasons RTWM chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does RTWM Share?	Can you limit this sharing?
<b>For our everyday business purposes</b> – such as to process your transactions, maintain your accounts(s) or respond to court orders and legal investigations.	<b>YES</b>	<b>NO</b>
<b>For our marketing purposes</b> – to offer our products and services to you	<b>YES</b>	<b>YES</b>
<b>For joint marketing with other financial companies</b>	<b>NO</b>	<b>N/A</b>
<b>For our affiliates’ everyday business purposes</b> – information about your transactions and experiences	<b>NO</b>	<b>N/A</b>
<b>For our affiliates’ everyday business purposes</b> – information about your creditworthiness	<b>NO</b>	<b>N/A</b>
<b>For our affiliates to market to you</b>	<b>NO</b>	<b>N/A</b>
<b>For non-affiliates to market to you</b>	<b>NO</b>	<b>N/A</b>

<b>TO LIMIT OUR SHARING</b>	<b>PLEASE NOTE:</b>
	If you are a new customer, we can begin sharing your information 3 days from the date we sent this notice. When you are no longer our customer, we may continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.
<b>QUESTIONS?</b>	Call RTWM at (908) 789-7310 or visit <a href="http://www.roundtablewealth.com">www.roundtablewealth.com</a>

**WHAT WE DO**

<b>How does RTWM protect my personal information?</b>	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards, secured files, and secured buildings.
<b>How does RTWM collect my personal information?</b>	<p><b>We collect your personal information, for example, when you</b></p> <ul style="list-style-type: none"> <li>• Enter into an advisory contract or seek financial advice</li> <li>• Provide documents and correspondences, and meet with RTWM</li> <li>• Make deposits or withdrawals from your account</li> <li>• Tell us about your investment or retirement portfolio</li> <li>• Give us your employment history</li> </ul>
<b>Why can't I limit all sharing?</b>	<p><b>Federal law gives you the right to limit only</b></p> <ul style="list-style-type: none"> <li>• Sharing for affiliates' everyday business purposes – information about your creditworthiness</li> <li>• Affiliates from using your information to market to you</li> <li>• Sharing for non-affiliates to market to you</li> </ul> <p>State laws and individual companies may give you additional rights to limit sharing.</p>
<b>What happens when I limit sharing for an account I hold jointly with someone else?</b>	Your choices will apply to everyone on your account – unless you tell us otherwise.

**DEFINITIONS**

<b>Affiliates</b>	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>• RTWM, in the normal course of business, may share information with affiliates, including affiliated private funds and insurance business, where applicable. We will never share your information for marketing purposes, only for client service purposes.</li> </ul>
<b>Non-affiliates</b>	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>• RTWM does not share with non-affiliates so they can market to you.</li> </ul>
<b>Joint Marketing</b>	<p>A formal agreement between non-affiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> <li>• RTWM does not jointly market.</li> </ul>

**OTHER IMPORTANT INFORMATION**

In the event there were to be a material change to our privacy policy regarding how we use your confidential information, we will provide written notice to you. Where applicable, you would be given an opportunity to limit or opt-out of such disclosure arrangements.