

Item 1 - Cover Page

Halbert Wealth Management, Inc.

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Austin, TX 78733

800-348-3601

February 29, 2024

This Brochure provides information about the qualifications and business practices of Halbert Wealth Management, Inc. If you have any questions about the contents of this Brochure, please contact us at 512-263-3800 or 800-348-3601. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Halbert Wealth Management is a Registered Investment Advisor. Registration as an Investment Advisor does not imply any level of skill or training. The oral and written communications of an Advisor provide you with information about which you can determine to hire or retain an Advisor.

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

Item 2 – Material Changes

Halbert Wealth Management no longer advises investors directly, but instead helps other Investment Advisors to identify, evaluate and manage investments within a portfolio.

Our Brochure may be requested free of charge by contacting us at 512-263-3800 or info@halbertwealth.com.

Additional information about Halbert Wealth is also available via the SEC's website www.Advisorinfo.sec.gov. The SEC's website also provides information about any persons affiliated with Halbert Wealth who are registered, or are required to be registered, as Investment Advisor Representatives of Halbert Wealth.

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Item 4 – Advisory Business

Halbert Wealth is an Investment Advisory firm registered in Texas and founded in 1995 by Gary D. and Debi B. Halbert. The firm is 100% owned by Debi B. Halbert. Halbert Wealth is a strategy consultant and as such has no clients who are individual investors. Clients of Halbert Wealth who receive consulting services are other Investment Advisors. As of December 31, 2023, the approximate total assets under management are \$69,076,616.

Written Acknowledgement of Fiduciary Status

When we provide investment advice, 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. 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.

Item 5 – Fees and Compensation

When Halbert Wealth gives strategy advice to an Investment Advisor as a consultant, the firm is paid a portion of the fees charged by the Advisor from accounts invested in the strategy. More details on the fees charged, how they are deducted and issues related to additions and redemptions, partial quarters, how fees are calculated when an account is opened or closed, and other fee related information can be found in the information published by each individual Investment Advisor.

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

Halbert Wealth currently does not offer performance fee arrangements.

Item 7 – Types of Clients

Halbert Wealth provides services directly to Investment Advisors. The firm may also provide services to corporate pension and profit-sharing plans, charitable institutions, foundations and endowments. Account minimums are imposed by the Investment Advisor or other money manager.

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

Halbert Wealth has developed the HWM Alpha Advantage Strategy, an aggressive, technical strategy that invests in long and inverse leveraged mutual funds and is actively managed. Although the blending of multiple market signals in this strategy has the goal of managing downside risk, there is a potentially greater risk of loss since leveraged mutual funds are utilized and losses can be magnified. Frequent trading can affect investment performance. There may also be certain tax implications to consider, including wash sale issues and/or short-term gains in some cases. Strategy offering materials should be thoroughly reviewed to understand the details about the particular risks involved.

Item 9 – Disciplinary Information

Registered Investment Advisors are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Halbert Wealth or the integrity of Halbert Wealth's management. Halbert Wealth does not believe there is any material information to disclose that is applicable to this Item.

Item 10 – Other Financial Industry Activities and Affiliations

Halbert Wealth has no additional affiliations or financial industry activities beyond its role as a consultant to Investment Advisors.

Item 11 – Code of Ethics

Halbert Wealth has adopted a Code of Ethics for all supervised persons describing its high standard of business conduct and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, as well as personal securities trading procedures, among other things. All supervised persons at Halbert Wealth must acknowledge the terms of the Code of Ethics annually, or as amended. A copy of the Code of Ethics is available to any client or prospective client upon request.

We have instituted procedures for monitoring the securities transactions of our associated persons, which include a quarterly review of reports of personal securities transactions effected by our associated persons (including accounts in which they had any direct or indirect beneficial ownership and which they had direct or indirect influence over) during the preceding quarter. In addition, if an associated person maintains a securities trading account at another broker-dealer in which they had any direct or indirect beneficial ownership and which they had direct or indirect influence over, the other broker-dealer will provide a copy of the employee's statement to a manager who reviews it for compliance purposes.

Halbert Wealth's clients or prospective clients may request a copy of its Code of Ethics by contacting us at 512-263-3800, or by email at info@halbertwealth.com.

Item 12 – Brokerage Practices

Halbert Wealth does not select the broker/dealer used for custody and trading. The Investment Advisor to whom consulting services have been given makes that decision. There may be certain conflicts of interests involved in their selection, and there may be benefits considered “soft dollars” that they receive. You should review the particular Investment Advisors’ ADV Part 2A and other disclosure documents for more complete details regarding their conflicts of interest.

As a matter of policy and practice, Halbert Wealth does not need to obtain the best execution for transactions since the firm does not trade investor accounts. Again, review the particular Investment Advisors’ ADV Part 2A and other disclosure documents for more complete details regarding their trading practices.

Item 13 – Review of Accounts

Since Halbert Wealth only consults with Investment Advisors, we do not review individual investment accounts. However, we periodically review the trade group asset allocations of the strategy used by our Investment Advisor clients.

Item 14 – Compensation

We receive compensation from outside Investment Advisors with whom we have a consulting relationship. We share in the management fee they charge investors.

Item 15 – Custody

Investors should receive at least quarterly statements from the broker or other qualified custodian that holds and maintains their investment assets. Halbert Wealth urges investors to carefully review such statements and compare the official custodial records to account statements that may be provided to them by their Investment Advisor. If any discrepancies are discovered, they should be brought to the attention of the Investment Advisor as soon as possible.

Item 16 – Investment Discretion

As a strategy consultant, we do not have discretionary authority over individual investor accounts. The Investment Advisor for the specific program selected by the investor has discretionary authority.

Item 17 – Voting Investor Securities

As a matter of policy and practice, Halbert Wealth does not have any authority to and does not vote proxies on behalf of investors. Investors retain the responsibility for receiving and voting proxies for all securities maintained in their portfolios. Third party Investment Advisors that utilize Halbert Wealth as a consultant have their own Voting Client Securities policies which investors should read before they invest with the Investment Advisors to fully understand their specific policies. Individual investors will receive their proxies or other solicitations directly from their custodian or transfer agent.

Item 18 – Financial Information

Registered Investment Advisors are required in this Item to provide you with certain financial information or disclosures about Halbert Wealth’s financial condition. Halbert Wealth has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

ADV Part 2B – Brochure Supplements

Item 1 – Cover Page for Debi B. Halbert

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Austin, TX 78733

Supplement to Form ADV Part 2 – January 1, 2023

This Brochure provides information about Debi Halbert that supplements the Halbert Wealth Management brochure. You should have received a copy of that brochure. Please contact Debi Halbert at 512-263-3800 or by email at debi@profutures.com if you did not receive Halbert Wealth Management's brochure or if you have any comments about the content of this supplement.

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

Item 2 – Educational Background and Business Experience

Debi Halbert was born in 1955, helped organize the firm and serves as Secretary/Treasurer and Chief Compliance Officer. She attended Richland College. She co-founded Halbert Wealth Management in 1995 and has been active in the securities business for over 30 years.

Item 3 – Disciplinary Information

There is no material disciplinary information to report.

Item 4 – Other Business Activities

Debi Halbert helped organize ProFutures, Inc. ("PF"), a registered CFTC and NFA commodity pool operator, in 1984 and serves as Secretary/Treasurer of the entity. As of December 31, 2015, PF is no longer registered with the CFTC or NFA.

This other business is a related entity of Halbert Wealth and is under common ownership. Debi Halbert devotes minimal time to this other entity.

Item 5 – Additional Compensation

Debi Halbert is paid a salary for her work at the Firm.

Item 6 – Supervision

Debi Halbert is the Secretary/Treasurer and Chief Compliance Officer of the Firm. There are also procedures in place to supervise the advisory activities of all persons at the Firm. All marketing materials used by the Firm are reviewed before they are approved for use. As the Firm's Chief Compliance Officer, she is responsible for the review of these materials.

Notice of Privacy Practices

We consider it our great privilege to serve you. We have always been committed to maintaining customer confidentiality. We are committed to safeguarding client information and take this opportunity to clarify our privacy practices.

The privacy policies described in this notice apply to clients who obtain or apply for a financial product or service, or have done so in the past and are a client of Halbert Wealth Management.

As part of our business, we obtain certain “non-public personal financial information” about you, which for ease of reading we will refer to as “information” in this notice. This includes information such as your social security number, net income, etc., which we receive from you on applications, investment advisory contracts or from other forms, as well as information concerning your transactions with us.

- We do not disclose this information about you or any former customers with any non-affiliated third parties, except as required to process transactions, service your account, comply with regulators and accountants, or as required by law.
- We do not sell or otherwise share this information with third-parties.
- We restrict access to the information to authorized individuals who need to know this information to provide service and products to you.
- We maintain physical, electronic and procedural safeguards to protect the confidentiality of your information.
- Your information may be shared with our affiliates, which are money management companies and other financial service providers.

You do not need to call or do anything as a result of this notice. It is meant to inform you of how we safeguard your non-public personal financial information. You may wish to file this notice with your papers. We reserve the right to change this policy as needed. You can contact us at 800-348-3601 for the latest Policy or you can view it on our website - **www.halbertwealth.com**.

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