Rothman Investment Management, LLC
Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of Rothman Investment Management, LLC. If you have any questions about the contents of this brochure, please contact us at (805) 538-9537 or by email at jake@rothmaninvest.com. 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 Rothman Investment Management, LLC is also available on the SEC's website at www.adviserinfo.sec.gov. *Rothman Investment Management, LLC's CRD number is: 173139.*

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

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Item 2: Material Changes

The material changes in this brochure from the last annual updating amendment dated March 18, 2026, are summarized below. These changes relate to Rothman Investment Management, LLC's advisory services, fees, business practices, or conflicts of interest.

- **Item 5.A – Fees and Compensation:** Updated the fee schedule to reflect an increase in the minimum fee for comprehensive financial planning services. Clarified fee waiver provisions, the valuation methodology used for certain illiquid assets, and portfolio management billing practices for certain assets held outside the firm's primary custodian.

- **Item 8.A – Methods of Analysis, Investment Strategies, and Risk of Investment Loss:** Expanded disclosures regarding the firm's investment strategies and portfolio construction methodology, including additional information concerning investment selection, portfolio implementation, and the use of specialized investment strategies.

- **Item 10.C – Other Financial Industry Activities and Affiliations:** Added and expanded disclosures regarding outside activities and potential conflicts of interest involving a supervised person, including a minority ownership interest in a private business venture and an unpaid volunteer role with a church. The disclosure describes the nature of these outside activities and related potential conflicts of interest.

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Item 4: Advisory Business

Business Description

We provide discretionary and non-discretionary investment advisory services to individuals and high-net-worth individuals. This could include investing in exchange-traded funds (ETFs), stocks, mutual funds, fixed income securities, real estate funds (including REITs). As a registered investment adviser, we are held to the highest standard of client care – a fiduciary standard. As a fiduciary, we always put our client's interests first and must fully disclose any potential conflict of interest. We do not have custody of client assets other than deducting fees.

We provide financial planning services including retirement planning, tax planning, estate planning (but not setting up estate documents) and philanthropy planning.

We will consider other financial advice as needed on a case by case basis.

A. Description of the Advisory Firm

Rothman Investment Management, LLC (hereinafter "RIM") is a Limited Liability Company organized in the State of California.

The firm was formed in August 2014, and the principal owner is Jacob Rothman. Larson Patty acquired a minority partnership interest in December of 2024.

B. Types of Advisory Services

Portfolio Management Services

RIM offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. RIM creates an Investment Policy Statement for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels) and then constructs a plan to aid in the selection of a portfolio that matches each client's specific situation. Portfolio management services include, but are not limited to, the following:

- Investment strategy
- Asset selection
- Risk tolerance
- Personal investment policy
- Asset allocation
- Regular portfolio monitoring

RIM evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. RIM. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client. RIM uses its best judgment to manage portfolios on a discretionary basis, and to comply with the Investment Policy Statement.

RIM seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of RIM's economic, investment or other financial interests. To meet its fiduciary obligations, RIM attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, RIM's policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client over another over time. It is RIM's policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent, including initial public offerings ("IPOs") and other investment opportunities that might have a limited supply, among its clients on a fair and equitable basis over time.

Services Limited to Specific Types of Investments

RIM generally uses ETFs in constructing client portfolios, but may also use some other types of investments such as mutual funds, individual securities, REITs (public and private), Delaware Statutory Trusts, and private equity, it may also use private credit, options and annuities, when appropriate.

Financial Planning

RIM offers comprehensive financial planning for a stand-alone fee. This service will include an assessment of the client's goals, objectives, risk tolerance, obligations, revenue sources and special needs, and will result in an actionable financial plan. The process typically takes four meetings.

Consulting

Subject to availability, RIM may provide business or personal financial consulting services for an hourly rate.

Financial Coaching

RIM offers ongoing financial coaching. This includes everything offered in the Financial Planning Service and also ongoing coaching with implementation of the recommendations and accomplishing goals, as well as updating the plan and setting new goals as necessary. Investment management is not included, but financial coaching clients will receive help with asset allocation and implementation recommendations. This service can be payable monthly or quarterly and costs $5,000 per year. Meeting frequency is quarterly.

Written Acknowledgement of Fiduciary Status

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.

C. Client Tailored Services and Client Imposed Restrictions

RIM will tailor a program for each individual client. This will include an interview session to get to know the client's specific needs and requirements as well as a plan that will be executed by RIM on behalf of the client. RIM may use model portfolios – templates based on risk tolerance, outside investments, and specific factors, together with a specific set of recommendations for each client based on their personal restrictions, needs, and targets. RIM also considers tax sensitive investing and liquidity needs when tailoring services for clients. Clients may impose restrictions on investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent RIM from properly servicing the client account, or if the restrictions would require RIM to deviate from its standard suite of services, RIM reserves the right to end the relationship.

D. Wrap Fee Programs

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and other administrative fees. RIM does not participate in any wrap fee programs.

E. Assets Under Management

RIM has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
$ 104,336,181	$ 260,503	December 2025

Item 5: Fees and Compensation

A. Fee Schedule

Advisory fees are not negotiable; however, RIM may, in its sole discretion, reduce or waive fees in certain circumstances. Lower fees for comparable services may be available from other sources.

Portfolio Management Fees

Asset bracket (marginal fee rate)	Annual Fee
$0 - $ 1,000,000	1.00%, subject to $5,000 annual minimum fee
$1,000,001 - $5,000,000	0.75%
$>$5,000,000	0.50%

Fees are billed in rate tiers. Every client is subject to the first tier (1% of AUM) for their first $1,000,000 of assets and then progresses to the next tier only on assets exceeding the lower tier. RIM uses an average of the daily balances in the client's account throughout the billing period, taking into account deposits and withdrawals, for purposes of determining the market value of the assets upon which the advisory fee is based. Illiquid assets are value based on their initial value at the time of investment, plus reinvested income, unless a different valuation methodology is agreed upon. Fees are assessed quarterly, in arrears, and the fee tiers are calculated quarterly, except for in certain cases where assets are held outside of RIM's primary custodian. In these cases, fees may be assessed monthly. In these cases, RIM will include the existence of monthly billing in the client contract. RIM requires a minimum annual fee of $ 5,000 for portfolio management services. For account values below $ 500,000, this will equate to a fee greater than 1%. The minimum fee is applied quarterly at $ 1,250 and assessed at the end of each calendar year. The minimum fee will not apply unless the client has received advisory services from RIM.

The applicable fee schedule is included in the Investment Advisory Contract. Should the client have more than one account managed by RIM, the accounts will be aggregated, unless instructed otherwise by the client, for the purpose of computing advisory fees. Clients may terminate the agreement without penalty for a full refund of RIM's fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract with 30 days' written notice. Certain illiquid investments may take longer than 30 days to liquidate.

In addition to fees charged by RIM, funds selected by RIM have their own internal fees. RIM does not share in these fees. RIM seeks to get the lowest fees for the client for a specific strategy. RIM may select a fund with a higher fee than other comparable funds if it believes the differences among the funds warrants the higher fee.

The broker/custodian may also charge fees, including commissions for trades. RIM does not receive any fee sharing and is sensitive to commissions when making investment decisions. RIM seeks Best Execution on behalf of clients.

Financial Planning Fees Project Based/Hourly

For clients interested in financial planning we will start with a free consultation. After this, the planner will discuss a possible engagement with the client, and any relevant fees. Fees will be either project-based, or hourly. If an hourly rate is suggested, RIM's hourly rate is $400. Discounts may be available. An estimate of the number of hours required for the project will be provided to the client and work will not proceed until the client agrees. A comprehensive financial plan starts at $4,000 but could vary depending on the situation. The timing of payment is negotiable depending on the arrangement. Factors that will result in increased costs include business planning issues, incentive compensation depending on the complexity, analysis of non-liquid investments, etc.

These fees may be negotiable depending on the situation, and the final fee schedule is included in the Financial Planning Agreement. Clients may terminate the Financial Planning Agreement upon written notice without penalty, for full refund of RIM's fees within five business days of signing the Financial Planning Agreement. However, if this Agreement is terminated prior to completion of the financial planning services, then the Client will be responsible for paying the prorated fee for work completed but unpaid (if any) at the time the termination becomes effective.

Consulting Fee - Hourly

Clients interested in consulting services for business projects, personal finance, or educational events can hire RIM on an hourly basis. RIM will sit down with the client to figure out the scope of project and then put together a proposal for the client. Once the Agreement is signed a 50% deposit will be paid at signing and the rest of the fee will be paid in arrears to the completion of the project. Jacob Rothman's billing rate is $400/hour, and Larson Patty's is $250.

These fees are not negotiable and the final fee schedule is included in the Consulting Agreement. If the client desires a project fee instead of an hourly fee, RIM will estimate the cost of the project and propose a fee, which is negotiable. Clients may terminate the Consulting Fee upon written notice without penalty, for full refund of RIM's fees within five days of signing the Consulting Agreement. However, if this agreement is terminated after five days, but prior to completion of the consulting agreement, then the client will be responsible for paying the prorated fee for the hours of work completed.

Financial Coaching Fee

These fees are not negotiable and the final fee schedule is included in the Coaching Agreement. Financial coaching costs $5,000 per year, payable quarterly. If clients wish to end the coaching relationship, the termination will be considered effective at the end of the last quarter in which the client and coach met. Virtual meetings count as meetings.

B. Payment of Fees

Payment of Asset-Based Portfolio Management Fees

Asset-based portfolio management fees are withdrawn directly from the client's accounts with the client's written authorization on a quarterly basis. However, a client may decide to be invoiced and billed directly on a quarterly basis. Fees are paid quarterly, in arrears.

Payment of Financial Planning Fees

Financial planning fees are paid via check, cash, or electronically.

Hourly financial planning fees are paid in arrears upon completion of the plan or project.

Consulting Fee

Hourly consulting fee is paid in arrears of service and can be paid via check, cash, or electronically.

Financial Coaching Fees

Financial Coaching Fees are paid via cash, check or wire.

C. Client Responsibility For Third Party Fees

Clients are responsible for the payment of all third-party fees (i.e., custodian fees, commissions, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by RIM. Please see Item 12 of this brochure regarding broker-dealer/custodian.

D. Prepayment of Fees

RIM collects its fees in arrears. It does not collect fees in advance.

E. Outside Compensation For the Sale of Securities to Clients

Neither RIM nor its supervised persons accept any compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

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

RIM does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

Item 7: Types of Clients

RIM generally provides advisory services to the following types of clients:

- Individuals
- High-Net-Worth Individuals 11
- Charitable Organizations

Minimum Account Size

There is no account minimum for any of RIM's services. There is a minimum annual portfolio management fee of $ 5,000. For account values below $ 500,000, this will equate to a fee greater than 1%. Clients who began working with us while our minimum was lower will enjoy the minimum fee in place when they started working with us but will still be subject to the higher of the calculated or minimum fee.

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

A. Methods of Analysis and Investment Strategies

Methods of Analysis

RIM's methods of analysis include fundamental analysis, quantitative analysis and modern portfolio theory.

Fundamental analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

Quantitative analysis deals with measurable factors as distinguished from qualitative considerations such as the character of management or the state of employee morale, such as the value of assets, the cost of capital, historical projections of sales, and so on.

Modern portfolio theory is a theory of investment that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, each by carefully choosing the proportions of various asset.

Investment Strategies

RIM uses long term-oriented investment strategies. It may engage in short sales, margin transactions and options trading (including covered options, uncovered options, or spreading strategies), but these are not core to the investment approach, and clients will be notified before any of these strategies are used. Clients may be allocated to in-house strategies when the portfolio manager believes it is appropriate, but the client will not be charged an additional fee. Currently, RIM runs a small cap value strategy, an asset profitability, and a dividend strategy in-house. RIM generally prefers rules-based (quantitative) strategies, and utilizes quantitative value ETFs, quantitative momentum ETFs, and other fundamentals-based ETFs. It also uses other strategies as appropriate, including special situations Mortgage-Backed Securities fund, Return-Stacked® ETFs, and ETFs holding commodities, CLOs, and other investments. RIM also utilizes a non-traded Private Capital fund and non-traded REIT when appropriate for clients. From time to time, we may add other strategies that we recommend for clients based on our research and client objectives. We believe these strategies offer a positive risk/reward balance, but carry significant tracking error risk relative to their benchmarks. Because our focus is long term, we believe that deviations from benchmarks are an acceptable price for the prospects of better returns over the long-term. From time to time, we add other strategies and funds to our client portfolios, either to replace existing ones or to complement the legacy portfolio. Strategies are added based on long-term excess returns (in live or simulated data) with intuitive explanations for why such returns were or would have been experienced and for why they should persist. Strategies should bring an incremental benefit to the portfolio when added to what is already in the portfolio. Finally, cost of execution is considered. Due to tax and operational efficiency, strategies are usually expressed through an ETF, but the firm may consider using a Mutual Fund or even directly executing a strategy when appropriate.

The purpose of the wide variety of strategies is to offer diversification beyond the broad stock and bond markets.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

B. Material Risks Involved

Methods of Analysis

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued relative to certain financial metrics. There is risk that company financials may be deteriorating, justifying the price discount.

Quantitative Model Risk: Investment strategies using quantitative models may perform differently than expected as a result of, among other things, the factors used in the models, the weight placed on each factor, changes from the factors' historical trends, and technical issues in the construction and implementation of the models.

Modern Portfolio Theory assumes that investors are risk adverse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio exists with a more favorable risk-expected return profile – i.e., if for that level of risk an alternative portfolio exists which has better expected returns. While modern portfolio theory has some weaknesses in execution, it is a good starting point for understanding the relationship between risk and expected return.

Investment Strategies

Primarily through quantitative (i.e. computer-driven) funds, RIM invests in value,. momentum and quality strategies, as well as indexing, and other strategies that attempt to add value for investors. Each of these strategies has its own risk. New strategies are evaluated from time to time and may be included if they add diversification and if management believes the risk/return of the entire portfolio is improved. RIM expects that the use of multiple strategies with positive long-term results diversifies portfolios, but such benefit may not materialize. The performance of diverse strategies could become more correlated than they were historically.

RIM's use of short sales, margin transactions and options trading generally holds greater risk, and clients should be aware that there is a material risk of loss using any of those strategies. RIM will not directly engage in these activities without first explaining their purpose to the client and getting approval, with the exception of options that reduce the overall risk of the portfolio. Most client portfolios will not include these tools, and those that do will be kept to small position sizes. However, RIM does use ETFs that employ long and short options and futures.

RIM does use inverse and leveraged inverse funds to hedge the core portfolio holdings according to the rules-based risk mitigation overlay system.

Short sales entail the possibility of infinite loss. An increase in the applicable securities' prices will result in a loss and, over time, the market has historically trended upward.

Margin transactions use leverage that is borrowed from a brokerage firm as collateral. When losses occur, the value of the margin account may fall below the brokerage firm's threshold thereby triggering a margin call. This may force the account holder to either allocate more funds to the account or sell assets on a shorter time frame than desired.

Options transactions involve a contract to purchase or sell a security at a predetermined price. This strategy includes the risk that an option may expire out of the money resulting in minimal or no value, as well as the possibility of leveraged loss of trading capital due to the leveraged nature of stock options.

Non-traded private funds invest in assets not traded on an exchange. This presents additional risks. In addition to the risk of a loss of value due to business failure, non-traded funds carry illiquidity risk. Investors may not be able to access funds invested in non-traded, private funds until the fund liquidates. Further, funds invested in illiquid assets such as non-traded private funds cannot be used for rebalancing a portfolio. Private funds are usually less diversified than public funds and may be subject to financing risk.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear. We seek to limit risk exposure to what the client can tolerate.

C. Risks of Specific Security Types

RIM's use of short sales, margin transactions and options trading generally holds greater risk of capital loss. Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below (aside from Treasury Inflation Protected/Inflation Linked Bonds) are not guaranteed or insured by the FDIC or any other government agency. These types of investments are not used for most clients and not without first explaining the rationale to the clients, with the exception of options used for protection to reduce the risk of the overall portfolio. Risk is considered in the context of the overall portfolio, so at times RIM will add positions that are individually risky but that reduce the overall risk of the portfolio, or only slightly increase the overall risk while having an outsized impact on expected returns.

Mutual Funds: Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond "fixed income" nature (lower risk) or stock "equity" nature.

Equity investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

Fixed income investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

Exchange Traded Funds (ETFs): An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100%). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed "electronic shares" not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors.

Real Estate funds (including REITs) face several kinds of risk that are inherent in the real estate sector, which historically has experienced significant fluctuations and cycles in performance. Revenues and cash flows may be adversely affected by: changes in local real estate market conditions due to changes in national or local economic conditions or changes in local property market characteristics; competition from other properties offering the same or similar services; changes in interest rates and in the state of the debt and equity credit markets; the ongoing need for capital improvements; changes in real estate tax rates and other operating expenses; adverse changes in governmental rules and fiscal policies; adverse changes in zoning laws; the impact of present or future environmental legislation and compliance with environmental laws.

Commodities are tangible assets used to manufacture and produce goods or services. Commodity prices are affected by different risk factors, such as disease, storage capacity, supply, demand, delivery constraints and weather. Because of those risk factors, even a well-diversified investment in commodities can be uncertain.

Options are contracts to purchase a security at a given price, risking that an option may expire out of the money resulting in minimal or no value. An uncovered option is a type of options contract that is not backed by an offsetting position that would help mitigate risk. The risk for a "naked" or uncovered put is not unlimited, whereas the potential loss for an uncovered call option is limitless. Spread option positions entail buying and selling multiple options on the same underlying security, but with different strike prices or expiration dates, which helps limit the risk of other option trading strategies. Option transactions also involve risks including but not limited to economic risk, market risk, sector risk, idiosyncratic risk, political/regulatory risk, inflation (purchasing power) risk and interest rate risk.

Non-U.S. securities present certain risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available.

Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Item 9: Disciplinary Information

A. Criminal or Civil Actions

There are no criminal or civil actions to report.

B. Administrative Proceedings

There are no administrative proceedings to report.

C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

A. Registration as a Broker/Dealer or Broker/Dealer Representative

Neither RIM nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither RIM nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

All material conflicts of interest under Section 260.238 (k) of the California Corporations Code are disclosed regarding the investment adviser, its representatives or any of its employees, which could be reasonably expected to impair the rendering of unbiased and objective advice.

Larson Duncan Patty holds real estate licenses in the states of Texas and Wyoming.

Larson Duncan Patty is also a partner in several LLCs primarily used to hold real estate investments for lease.

Larson Duncan Patty is a minority owner in a private business venture and may perform limited administrative activities associated with the venture. This activity is separate from his responsibilities with RIM.

Larson Duncan Patty also serves in an unpaid volunteer capacity assisting a church with its Elder Fund. In this role, he evaluates requests for financial assistance, makes recommendations regarding charitable support, and may have signing authority over the Elder Fund's cash account. The Elder Fund is held entirely in cash and is not managed or advised by RIM. RIM separately provides investment advisory services for a different church account.

D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections

RIM does not utilize nor select third party investment advisers, with the exception of the Tax-Aware Long/Short strategy. In this case, the third-party manager bills the client account directly, in addition to the fee that RIM charges. RIM receives no benefit from the third-party manager.

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

A. Code of Ethics

Our Code of Ethics ("Code") is based on the principle that we have an overarching fiduciary duty to our clients. As a fiduciary, it is RIM's responsibility to provide fair and full disclosure of all material facts and to act solely in the best interest of each of our clients at all time and to place their interests ahead of our own. All personnel of RIM must adhere to the policies and procedures placed in our Code. This Code includes insider trading policy, business standards of conduct, personal securities transactions, exempted transactions, reporting requirements, prohibited transactions, improper transactions, exemptions, conflicts of interest, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, confidentiality, compliance with laws and regulations, procedures and reporting, reporting violations, compliance officer duties, training and education, and recordkeeping. All supervised persons at RIM must acknowledge the terms of the Code of Ethics annually, or as amended. Upon request, RIM will provide any client or prospective client a copy of the firm's Code of Ethics.

B. Recommendations Involving Material Financial Interests

RIM does not recommend that clients buy or sell any security in which a related person to RIM or RIM has a material financial interest.

C. Investing Personal Money in the Same Securities as Clients

RIM may manage employee accounts but these are conducted in a manner that seeks to avoid any conflict of interest. Employees and Portfolio managers are required to avoid serving their own

personal interest ahead of the interests of the RIM's Advisory Clients. The Portfolio manager ensures that no client is preferred over any other client. Portfolio Managers trade accounts by their mandates using pro rata, block trading, or randomization to order trades in a way that treats all accounts equally. Employee accounts managed by RIM will trade after all client accounts have traded if they are not included in the block trades. Furthermore, all accounts managed by RIM must be in full compliance and adhere to the Code of Ethics. Any doubtful situations will be resolved in favor of the Advisory Client.

D. Trading Securities At/Around the Same Time as Clients' Securities

RIM maintains policies and procedures to ensure that all clients are treated fairly, without regard for client size, employment with the firm, or relation to RIM employees. If RIM manages an employee account and desires to make a trade on the same day in the same security as a client, including options through the same broker, the employee trade may be executed as part of an aggregated block trade with the client accounts through the broker. A block execution gives the same average price to all clients and employees transacting in a given security. However, if the entire block order is not filled, then the Portfolio Manager will allocate the fills on a pro rata basis, with employee accounts receiving no allocation. Sometimes RIM may use a randomization method instead of block trading. This randomization is done by listing the accounts in an excel spreadsheet and each client assigned a number. A random number generator is then used to select which account will trade next. Also, any excluded trades for employees will be subject to a three-day calendar black-out period, unless they meet another exemption listed in our policies and procedures. Commissions may be assessed by the broker on a per-trade, per-account basis.

RIM portfolios are managed according to pre-established models, which are adjusted from time to time. These various models have different proportions of investments and are maintained consistently across all models by the same underlying proportions, subject to each individual client constraints. Large accounts and small accounts will sometimes use different specific securities to be efficient with expenses. For instance, our in-house small cap value strategy purchases individual micro, small and mid-cap stocks, with an expected average holding period of about a year. An allocation of less than $50,000 to this specific strategy does not warrant the higher transaction costs. In general, smaller accounts are simplified, but attempt to capture the same basic allocation of a larger account, albeit with less nuance and less expense.

RIM's employees may have separate accounts managed by outside advisors. If so, these accounts are required to have written confirmation from the manager, investment adviser, or trustee managing the account that the employee or spouse does not exercise investment discretion or have any direct or indirect influence or control over investment decisions.

Employees wishing to trade in their own accounts not managed by RIM must preclear with the CCO or designated person, who will check with portfolio managers to confirm that the firm is not planning on transacting in that security on behalf of clients. If the firm is considering transacting, the CCO will wait until the portfolio manager notifies the CCO that the firm trading is complete, before issuing preclearance. This assures employees do not advantage themselves and disadvantage clients by trading ahead of the clients.

Item 12: Brokerage Practices

A. Factors Used to Select Custodians and/or Broker/Dealers

Custodians/broker-dealers will be recommended based on RIM's duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients will not necessarily pay the lowest commission or commission equivalent, and RIM may also consider the market expertise and research access provided by the broker-dealer/custodian, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers that may aid in RIM's research efforts. RIM will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian.

RIM will require clients to use Charles Schwab & Co., Inc. Advisor Services, unless other arrangements are made. RIM does not have the ability to block trade with multiple brokers at this time. Charles Schwab & Co., Inc. Advisor Services was selected for its combination of good execution, good customer service, ease of use for the client, and tools available to help the firm best manage client funds.

1. Research and Other Soft-Dollar Benefits

While RIM has no formal soft dollars program in which soft dollars are used to pay for third party services, RIM may receive research, products, or other services from custodians and broker-dealers in connection with client securities transactions ("soft dollar benefits"). RIM may enter into soft-dollar arrangements consistent with (and not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended. There can be no assurance that any particular client will benefit from soft dollar research, whether or not the client's transactions paid for it, and RIM does not seek to allocate benefits to client accounts proportionate to any soft dollar credits generated by the accounts. RIM benefits by not having to produce or pay for the research, products or services, and RIM will have an incentive to recommend a broker-dealer based on receiving research or services. Clients should be aware that RIM's acceptance of soft dollar benefits may result in higher commissions charged to the client.

2. Brokerage for Client Referrals

RIM receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

3. Clients Directing Which Broker/Dealer/Custodian to Use

RIM will require clients to use Charles Schwab & Co., Inc. Advisor Services to execute transactions unless other arrangements are agreed to. Not all advisers require their clients to direct brokerage.

B. Aggregating (Block) Trading for Multiple Client Accounts

RIM may in some cases buy or sell the same securities on behalf of more than one client. It may, but is under no obligation to aggregate or bunch (e.g "block trade"), to the extent permitted by applicable law and regulations, the securities to be purchased or sold for multiple Clients in order to seek more equitable and more efficient execution. In such case, RIM would place an aggregate or "block" order with the broker on behalf of all such clients in order to ensure fairness for all clients; provided, however, that trades would be reviewed periodically to ensure that accounts are not systematically disadvantaged by this policy.

Item 13: Reviews of Accounts

A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

All client accounts for RIM's advisory services provided on an ongoing basis are reviewed at least quarterly. Clients' investment policies and risk tolerance levels are reviewed annually or as needed. All accounts at RIM are assigned to this reviewer.

All financial planning accounts are reviewed upon creation and plan delivery by Jacob Rothman, Portfolio Manager/Chief Compliance Officer. Once the client is provided their one-time financial plan concerning their situation, there are no further reports to provide. Clients may request additional services such as other reports and plans for a fee.

B. Factors That Will Trigger a Non-Periodic Review of Client Accounts

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

In regards to financial plans, RIM's financial plan agreement will generally conclude once the plan is delivered to the client.

C. Content and Frequency of Regular Reports Provided to Clients

RIM's ongoing advisory clients will receive a quarterly report detailing the client's account, including assets held, asset value, and calculation of fees withdrawn. This report

will come from RIM's portfolio accounting provider, Advyzon. Information will also be available on a more frequent basis. The custodian will provide monthly statements for each account, which the client can access directly.

Financial Planning clients will receive their plan upon completion.

Item 14: Client Referrals and Other Compensation

A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

Charles Schwab & Co., Inc. Advisor Services provides RIM with access to Charles Schwab & Co., Inc. Advisor Services' institutional trading and custody services, which are typically not available to Charles Schwab & Co., Inc. Advisor Services retail investors. These services generally are available to independent investment advisers on an unsolicited basis, at no charge to them so long as a total of at least $10 million of the adviser's clients' assets are maintained in accounts at Charles Schwab & Co., Inc. Advisor Services. Charles Schwab & Co., Inc. Advisor Services includes brokerage services that are related to the execution of securities transactions, custody, research, including that in the form of advice, analyses and reports, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment. For RIM client accounts maintained in its custody, Charles Schwab & Co., Inc. Advisor Services generally does not charge separately for custody services but is compensated by account holders through commissions or other transaction-related or asset-based fees for securities trades that are executed through Charles Schwab & Co., Inc. Advisor Services or that settle into Charles Schwab & Co., Inc. Advisor Services accounts.

Charles Schwab & Co., Inc. Advisor Services also makes available to RIM other products and services that benefit RIM but may not benefit its clients' accounts. These benefits may include national, regional or RIM specific educational events organized and/or sponsored by Charles Schwab & Co., Inc. Advisor Services. Other potential benefits may include occasional business entertainment of personnel of RIM by Charles Schwab & Co., Inc. Advisor Services personnel, including meals, invitations to sporting events, including golf tournaments, and other forms of entertainment, some of which may accompany educational opportunities. Other of these products and services assist RIM in managing and administering clients' accounts. These include software and other technology (and related technological training) that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts, if applicable), provide research, pricing information and other market data, facilitate payment of RIM's fees from its clients' accounts (if applicable), and assist with back-office training and support functions, recordkeeping and client reporting. Many of these services generally may be used to service all or some substantial number of RIM's accounts. Charles Schwab & Co., Inc. Advisor Services also makes available to RIM other services intended to help RIM manage

and further develop its business enterprise. These services may include professional compliance, legal and business consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, employee benefits providers, and human capital consultants, insurance and marketing. In addition, Charles Schwab & Co., Inc. Advisor Services may make available, arrange and/or pay vendors for these types of services rendered to RIM by independent third parties. Charles Schwab & Co., Inc. Advisor Services may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to RIM. RIM is independently owned and operated and not affiliated with Charles Schwab & Co., Inc. Advisor Services.

B. Compensation to Non – Advisory Personnel for Client Referrals

RIM does not compensate non-advisory personnel (solicitors/promoters) for client referrals, but does still compensate Zoe Financial Network for clients gained in the past from a client referral contract that is no longer active.

Item 15: Custody

RIM, with client written authority, has limited custody of client's assets through deducting advisory fees directly from client accounts. Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review their custodial statements to compare them to the statements provided by RIM.

Item 16: Investment Discretion

RIM provides discretionary and non-discretionary investment advisory services to clients. The Investment Advisory Contract established with each client sets forth the discretionary authority for trading. RIM generally manages the client's account and makes investment decisions without consultation with the client as to when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, what securities to buy or sell, or the price per share. In some instances, RIM's discretionary authority in making these determinations may be limited by conditions imposed by a client (in investment guidelines or objectives, or client instructions otherwise provided to RIM. RIM will meet with clients to review the Investment Policy Statement and ensure it stays current. For employer retirement plans, RIM works with the employer to develop the menu of investment choices, but participants select their own allocation.

Item 17: Voting Client Securities (Proxy Voting)

RIM will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

Item 18: Financial Information

A. Balance Sheet

RIM neither requires nor solicits prepayment of more than $500 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither RIM nor its management has any financial condition that is likely to reasonably impair RIM's ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years

RIM has not been the subject of a bankruptcy petition in the last ten years.

Item 19: Requirements for State Registered Advisers

A. Principal Executive Officers and Management Persons; Their Formal Education and Business Background

RIM currently has two management persons: Jacob Rothman and Larson Patty. Education and business background can be found on the individual's Form ADV Part 2B brochure supplement.

B. Other Businesses in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (If Any)

Other business activities for each relevant individual can be found on the Form ADV Part 2B brochure supplement for each such individual.

C. Calculation of Performance-Based Fees and Degree of Risk to Clients

RIM does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

D. Material Disciplinary Disclosures for Management Persons of this Firm

There are no civil, self-regulatory organizations, or arbitration proceedings to report under this section.

E. Material Relationships That Management Persons Have With Issuers of Securities (If Any)

See Item 10.C and 11.B.

This brochure supplement provides information about Jacob Timothy Rothman that supplements the Rothman Investment Management, LLC brochure. You should have received a copy of that brochure. Please contact Jacob Timothy Rothman if you did not receive Rothman Investment Management, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Jacob Timothy Rothman is also available on the SEC's website at www.adviserinfo.sec.gov.

Rothman Investment Management, LLC

Form ADV Part 2B – Individual Disclosure Brochure

for

Jacob Timothy Rothman

Personal CRD Number: 6399323

Investment Adviser Representative

9700 El Camino Real, Suite 301
Atascadero, CA, 93422
(805) 538-9537
jake@rothmaninvest.com
www.rothmaninvest.com

Rev. 09/03/2026

Item 2: Educational Background and Business Experience

Name: Jacob Timothy Rothman **Born:** 1976

Educational Background and Professional Designations:

Education:

Bachelor of Science, Business Administration from California Polytechnic State University – 1997
Master of Business Administration (MBA) from Darden Graduate School of Management, University of Virginia – 2005
Master of Arts in Religion (MAR) from Liberty Baptist Theological Seminary - 2011

Designations:

CFA – Chartered Financial Analyst

The Chartered Financial Analyst (CFA) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute - the largest global association of investment professionals.

There are currently more than 90,000 CFA charterholders working in 134 countries. To earn the CFA charter, candidates must: 1) pass three sequential, six-hour examinations; 2) have at least four years of qualified professional investment experience; 3) join CFA Institute as members; and 4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

High Ethical Standards
The CFA Institute Code of Ethics and Standards of Professional Conduct, enforced through an active professional conduct program, require CFA charterholders to:

- Place their clients' interests ahead of their own
- Maintain independence and objectivity
- Act with integrity
- Maintain and improve their professional competence
- Disclose conflicts of interest and legal matters

Global Recognition
Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study per level). Earning the CFA charter demonstrates mastery of many of the advanced skills needed for investment analysis and decision making in today's quickly evolving global financial industry. As a result, employers and clients are increasingly seeking CFA charterholders-often making the charter a prerequisite for employment.

Additionally, regulatory bodies in 22 countries and territories recognize the CFA charter as a proxy for meeting certain licensing requirements, and more than 125 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.

Comprehensive and Current Knowledge
The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.

The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession.

To learn more about the CFA charter, visit www.cfainstitute.org.

CPA - Certified Public Accountant

- CPAs are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include minimum college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting), minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA), and successful passage of the Uniform CPA Examination.

- In order to maintain a CPA license, states generally require the completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a two year period or 120 hours over a three year period). Additionally, all American Institute of Certified Public Accountants (AICPA) members are required to follow a rigorous Code of Professional Conduct which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interest (and obtain client consent if a conflict exists), maintain client confidentiality, disclose to the client any commission or referral fees, and serve the public interest when providing financial services. The vast majority of state boards of accountancy have adopted the AICPA's Code of Professional Conduct within their state accountancy laws or have created their own.

PFS – Personal Financial Specialist

- The Personal Financial Specialist (PFS) credential is awarded by the American Institute of Certified Public Accountants (AICPA) exclusively to licensed Certified Public Accountants (CPAs) who demonstrate specialized knowledge and experience in personal financial planning. To earn the PFS credential, candidates must hold an active CPA license, satisfy education and professional experience requirements in personal financial planning, successfully complete the PFS examination (or qualify through an approved credential pathway), and agree to abide by the AICPA Code of Professional Conduct.

- To maintain the PFS credential, holders must maintain an active CPA license, complete applicable continuing professional education (CPE) requirements, satisfy continuing education requirements specific to the PFS credential, and remain in compliance with the AICPA Code of Professional Conduct and all applicable licensing requirements.

CFP® - Certified Financial Planner

- CFP® professionals are certified through the CFP® board. Certification requires an educational requirement, successful passing of the CFP® Exam and four years of relevant experience. The two-part education requirement includes both (1) completing coursework on financial planning through a CFP Board Registered Program, and (2) holding a bachelor's degree or higher (in any discipline) from an accredited college or university. The average time to complete the coursework is twelve – eighteen months. Professionals who hold a CFA or CPA can waive most of the coursework, but must still successfully pass the Capstone course. The Exam is a six-hour one-day exam. The experience requirement is met with 6,000 hours of professional experience related to the financial planning process. Applicants also must meet the ethics requirement.

- Maintaining a CFP® license requires a minimum of fifteen hours of approved Continuing Education per year, including Ethics training.

CKA® - Certified Kingdom Advisor

- The Certified Kingdom Advisor® (CKA®) designation is awarded by Kingdom Advisors to financial professionals who integrate biblical wisdom with financial planning and investment advice. To earn the designation, candidates must meet minimum professional experience requirements, complete an approved educational curriculum, successfully pass a comprehensive examination, provide pastoral and client references, affirm a Statement of Faith, and agree to abide by the Kingdom Advisors Code of Ethics.

- To maintain the CKA® designation, certificants must remain in good standing with Kingdom Advisors, complete continuing education requirements, reaffirm their commitment to the Kingdom Advisors Code of Ethics and Statement of Faith, and continue to satisfy the organization's ongoing professional standards.

Business Background:

01/2015 - Present	Investment Adviser Representative Rothman Investment Management, LLC

Item 3: Disciplinary Information

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business.

Item 4: Other Business Activities

Jacob Timothy Rothman has no outside business activities.

All material conflicts of interest under Section 260.238 (k) of the California Corporations Code are disclosed regarding the investment adviser, its representatives or any of its employees, which

could be reasonably expected to impair the rendering of unbiased and objective advice.

Item 5: Additional Compensation

Jacob Timothy Rothman does not receive any economic benefit from any person, company, or organization, other than Rothman Investment Management, LLC in exchange for providing clients advisory services through Rothman Investment Management, LLC.

Item 6: Supervision

As the only owner and representative of Rothman Investment Management, LLC, Jacob Timothy Rothman supervises all activities of the firm. Jacob Timothy Rothman's response information is on the cover page of this disclosure document. Jacob Timothy Rothman adheres to all required regulations regarding the activities of an Investment Adviser Representative and follows all policies and procedures outlined in the firm's policies and procedures manual, including the Code of Ethics, and appropriate securities regulatory requirements.

Item 7: Requirements For State Registered Advisers

This disclosure is required by California state securities authorities and is provided for your use in evaluating this investment advisor representative's suitability.

A. Jacob Timothy Rothman has NOT been involved in any of the events listed below.

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.

B. Jacob Timothy Rothman has NOT been the subject of a bankruptcy petition in the past ten years.

This brochure supplement provides information about Larson Duncan Patty that supplements the Rothman Investment Management, LLC brochure. You should have received a copy of that brochure. Please contact Larson Duncan Patty if you did not receive Rothman Investment Management, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Larson Duncan Patty is also available on the SEC's website at www.adviserinfo.sec.gov.

Rothman Investment Management, LLC

Form ADV Part 2B – Individual Disclosure Brochure

for

Larson Duncan Patty

Personal CRD Number: 7604628

Investment Adviser Representative

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Atascadero, CA, 93422
(805) 704-8818 / (307) 752-0759
larson@rothmaninvest.com
www.rothmaninvest.com

Rev. 10/02/2026

Item 2: Educational Background and Business Experience

Name: Larson Duncan Patty **Born:** 1993

Educational Background and Professional Designations:

Education:

Master's of Science Financial Management, Texas A&M - 2017
Bachelor's of Science Agribusiness, Texas A&M - 2016
Bachelor's of Science Animal Science, Texas A&M – 2016

Designations:

CFP® - Certified Financial Planner

- CFP® professionals are certified through the CFP® board. Certification requires an educational requirement, successful passing of the CFP® Exam and four years of relevant experience. The two-part education requirement includes both (1) completing coursework on financial planning through a CFP Board Registered Program, and (2) holding a bachelor's degree or higher (in any discipline) from an accredited college or university. The average time to complete the coursework is twelve – eighteen months. Professionals who hold a CFA or CPA can waive most of the coursework, but must still successfully pass the Capstone course. The Exam is a six-hour one-day exam. The experience requirement is met with 6,000 hours of professional experience related to the financial planning process. Applicants also must meet the ethics requirement.

- Maintaining a CFP® license requires a minimum of fifteen hours of approved Continuing Education per year, including Ethics training.

EA – Enrolled Agent

- An Enrolled Agent (EA) is a tax professional who is federally authorized to represent taxpayers before the Internal Revenue Service (IRS). To become an Enrolled Agent, an individual must either successfully pass the IRS Special Enrollment Examination (SEE), which covers individual and business taxation, representation, and tax procedures, or qualify through qualifying prior experience with the IRS. Candidates must also pass a background check conducted by the IRS.

- To maintain the EA credential, Enrolled Agents must complete continuing education requirements established by the IRS, including ethics education, and renew their enrollment every three years.

CKA® - Certified Kingdom Advisor

- The Certified Kingdom Advisor® (CKA®) designation is awarded by Kingdom Advisors to financial professionals who integrate biblical wisdom with financial planning and investment advice. To earn the designation, candidates must meet minimum professional experience requirements, complete an approved educational curriculum, successfully pass a comprehensive examination, provide pastoral and client references, affirm a Statement of Faith, and agree to abide by the Kingdom Advisors Code of Ethics.

- To maintain the CKA® designation, certificants must remain in good standing with Kingdom Advisors, complete continuing education requirements, reaffirm their commitment to the Kingdom Advisors Code of Ethics and Statement of Faith, and continue to satisfy the organization's ongoing professional standards.

Business Background:

07/2022 - Present	Investment Adviser Representative Rothman Investment Management, LLC
09/2021 – 07/2022	Financial Planner Rothman Investment Management, LLC
07/2017 - 07/2021	Credit Analyst/Commercial Lender Independent Financial
07/2012 - 05/2017	N/A Student

Item 3: Disciplinary Information

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business.

Item 4: Other Business Activities

Larson Duncan Patty holds real estate licenses in the states of Texas and Wyoming.

Larson Duncan Patty is also a partner in several LLCs primarily used to hold real estate investments for lease.

Larson Duncan Patty is a minority owner in a private business venture and may perform limited administrative activities associated with the venture. This activity is separate from his responsibilities with Rothman Investment Management, LLC.

Larson Duncan Patty also serves in an unpaid volunteer capacity assisting a church with its Elder Fund. In this role, he evaluates requests for financial assistance, makes recommendations regarding charitable support, and may have signing authority over the Elder Fund's cash account. The Elder Fund is held entirely in cash and is not managed or advised by Rothman Investment Management, LLC. Rothman Investment Management, LLC separately provides investment advisory services for a different church account.

Larson Duncan Patty does not receive any economic benefit from any person, company, or organization, other than Rothman Investment Management, LLC in exchange for providing clients advisory services through Rothman Investment Management, LLC.

Item 5: Additional Compensation

Larson Duncan Patty does not receive any economic benefit from any person, company, or organization, other than Rothman Investment Management, LLC in exchange for providing clients advisory services through Rothman Investment Management, LLC.

Item 6: Supervision

As a representative of Rothman Investment Management, LLC, Larson Duncan Patty is supervised by Jacob Rothman, the firm's Chief Compliance Officer. Jacob Rothman is responsible for ensuring that Larson Duncan Patty adheres to all required regulations regarding the activities of an Investment Adviser Representative, as well as all policies and procedures outlined in the firm's Code of Ethics and compliance manual. The phone number for Jacob Rothman is (805) 538-9537.

Item 7: Requirements For State Registered Advisers

This disclosure is required by state securities authorities and is provided for your use in evaluating this investment advisor representative's suitability.

A. Larson Duncan Patty has NOT been involved in any of the events listed below.

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.

B. Larson Duncan Patty has NOT been the subject of a bankruptcy.

This brochure supplement provides information about Tyler Dale Chandler that supplements the Rothman Investment Management, LLC brochure. You should have received a copy of that brochure. Please contact Tyler Dale Chandler if you did not receive Rothman Investment Management, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Tyler Dale Chandler is also available on the SEC's website at www.adviserinfo.sec.gov.

Rothman Investment Management, LLC

Form ADV Part 2B – Individual Disclosure Brochure

for

Tyler Dale Chandler

Personal CRD Number: 8118569

Paraplanner

9700 El Camino Real, Suite 301
Atascadero, CA, 93422
(805) 859-4352
tyler@rothmaninvest.com
www.rothmaninvest.com

10/02/2026

Item 2: Educational Background and Business Experience

Name: Tyler Dale Chandler **Born:** 2004

Educational Background and Professional Designations:

Education:

Bachelor of Science, Business Administration, concentration in Financial Management, California Polytechnic State University, San Luis Obispo - 2026, cum laude

Designations:

Tyler Dale Chandler does not currently hold any professional designations.

Business Background:

06/2026 - Present	Paraplanner Rothman Investment Management, LLC
07/2025 – 09/2025	Summer Intern TSG Wealth Management
01/2023 - 06/2026	Event Staff Employee Cal Poly Event Staff
09/2022 - 06/2026	Full-Time Student California Polytechnic State University, San Luis Obispo

Item 3: Disciplinary Information

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business.

Item 4: Other Business Activities

Tyler Dale Chandler has no outside business activities.

All material conflicts of interest under Section 260.238 (k) of the California Corporations Code are disclosed regarding the investment adviser, its representatives or any of its employees, which could be reasonably expected to impair the rendering of unbiased and objective advice.

Item 5: Additional Compensation

Larson Duncan Patty does not receive any economic benefit from any person, company, or organization, other than Rothman Investment Management, LLC in exchange for providing clients advisory services through Rothman Investment Management, LLC.

Item 6: Supervision

As an employee of Rothman Investment Management, LLC, Tyler Dale Chandler is supervised by Jacob Rothman, the firm's Chief Compliance Officer. Jacob Rothman is responsible for ensuring that Tyler Dale Chandler adheres to all required regulations regarding the activities of a Paraplanner, as well as all policies and procedures outlined in the firm's Code of Ethics and compliance manual. The phone number for Jacob Rothman is (805) 538-9537.

Item 7: Requirements For State Registered Advisers

This disclosure is required by state securities authorities and is provided for your use in evaluating this paraplanner's suitability.

C. Tyler Dale Chandler has NOT been involved in any of the events listed below.

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.

D. Tyler Dale Chandler has NOT been the subject of a bankruptcy.