

# Rothman Investment Management Firm Brochure - Form ADV Part 2A

*This brochure provides information about the qualifications and business practices of Rothman Investment Management. If you have any questions about the contents of this brochure, please contact us at (805) 286-6378 or by email at [jake@rothmaninvest.com](mailto: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 is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Rothman Investment Management'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 of Rothman Investment Management on 03/10/2021 are described below. Material changes relate to Rothman Investment Management's policies, practices or conflicts of interests.

- Rothman Investment Management has updated fees and compensation (Item 5).

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## Item 4: Advisory Business

### *Business Description*

We provide 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 (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 Timothy Rothman.

### **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 allocation
- Risk tolerance
- Personal investment policy
- Asset selection
- 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, 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 \$4,000 per year. Meeting frequency is quarterly.

## **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 in 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:
\$11,932,940.00	\$0.00	December 2020

### **Item 5: Fees and Compensation**

#### **A. Fee Schedule**

Lower fees for comparable services may be available from other sources.

##### ***Portfolio Management Fees***

Total Assets Under Management	Annual Fee
\$0 - \$ 1,000,000	1.00%, subject to \$3,000 annual minimum fee
\$1,000,000 and above	0.75% on incremental assets

RIM uses an average of the daily balances in the client's account throughout the billing period, after taking into account deposits and withdrawals, for purposes of determining the market value of the assets upon which the advisory fee is based. RIM does require a minimum annual fee of \$ 3,000 for portfolio management services. For account values below \$ 300,000, this will equate to a fee greater than 1%. The minimum fee is assessed at the end of each calendar year. The minimum fee will not apply unless the client has received advisory services from RIM

These fees are generally negotiable and the final 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.

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. If RIM selects a fund that has a higher fee than other comparable funds, it is because RIM believes the selected fund has characteristics that warrant the fee differential. Clients are notified of this and it is documented.

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 the 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 \$250. 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 \$3,000 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.

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***

Clients interested in consulting services for business projects, personal finance, or educational events the fee is \$250 per hour. 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.

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***

Financial coaching costs \$4,000 per year, payable quarterly, monthly or in advance. 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 wire.

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, credit card, or wire.

### ***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 Management**

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
- ❖ 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 \$ 3,000. For account values below \$ 300,000, this will equate to a fee greater than 1%.

## **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 trading, short sales, margin transactions and options trading (including covered options, uncovered options, or spreading strategies). 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, and two alternatives strategies in-house. RIM generally prefers quantitatively run strategies, and utilizes quantitative value ETFs, quantitative momentum ETFs, and an ETF that mimic the investments of top-performing hedge fund managers as they report their holdings to the SEC. RIM also utilizes a non-traded Private Capital fund when appropriate for clients. 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.

**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.

## ***Investment Strategies***

Primarily through quantitative (i.e. computer-driven) funds, RIM invests in value and momentum strategies, as well as indexing, and a strategy that seeks to replicate top-tier 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 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.

**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.

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

### **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 (leaving aside 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% loss in the case of a stock holding bankruptcy). 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.

## **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.

# **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. In order to do this, 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. 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 will 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 are manages 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 TD Ameritrade, unless other arrangements are made. RIM does not have the ability to block trade with multiple brokers at this time. TD Ameritrade 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 TD Ameritrade 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 might, 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, Black Diamond. 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)**

RIM participates in the institutional division (Institutional Program) offered by TD Ameritrade. TD Ameritrade offers this service to independent advisors which include custody of securities, trade execution, clearance and settlement of transactions and financial products. RIM receives some benefits from TD Ameritrade through its participation in the Institutional Program.

RIM recommends clients to use TD Ameritrade for custody and brokerage services. There is no direct link between RIM participation in the Institutional Program and the investment advice it gives to its clients. However, RIM does receive certain economic benefit through its participation in the Institutional Program that are typically not available to TD Ameritrade retail investors. These benefits include various technological tools, items, and products that assist RIM in managing and servicing its clients such as, receipt of duplicate client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving RIM participants; access to block trading; the ability to have RIM's fees deducted directly from client accounts; access to an electronic communication 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, and services provided to RIM by third party vendors. TD Ameritrade may also pay for business consulting and professional services received by RIM related person. RIM's receipt of these benefits does not depend on the amount of brokerage transactions directed to TD Ameritrade. Some of the products and services made available by TD Ameritrade through the Institutional Program may benefit RIM but may not benefit the client accounts. These products or services may assist RIM in managing and administering client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help RIM manage and further develop its business enterprise. As part of its fiduciary duties to clients, RIM endeavors at all times to put the interests of

its clients first. Clients should be aware, that the receipt of economic benefits by RIM or its related persons in and of itself creates conflict of interest and may indirectly influence RIM's choice of TD Ameritrade for custody and brokerage services.

### **B. Compensation to Non – Advisory Personnel for Client Referrals**

RIM 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 by RIM. RIM pays the solicitor out of its own funds – specifically, RIM 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 a solicitors is strictly regulated under applicable federal and state law. RIM'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. RIM 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 17 fee-only personal investment management services or financial planning services to independent investment advisors. Zoe Financial does not supervise RIM and has no responsibility for RIM's management of client portfolios or RIM's other advice or services. RIM 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 RIM ("Solicitation Fee"). RIM will not charge clients referred through ZAN 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.

### **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 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.

### **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 only one management person: Jacob Timothy Rothman. 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 organization, 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 brochure. You should have received a copy of that brochure. Please contact Jacob Timothy Rothman if you did not receive Rothman Investment Management'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](http://www.adviserinfo.sec.gov).*

# **Rothman Investment Management**

## **Form ADV Part 2B – Individual Disclosure Brochure**

*for*

**Jacob Timothy Rothman**  
Personal CRD Number: 6399323  
Investment Adviser Representative

Rothman Investment Management  
9700 El Camino Real, Suite 302  
Atascadero, CA 93422  
(805) 286-6378  
[jake@rothmaninvest.com](mailto:jake@rothmaninvest.com)

UPDATED: 03/26/2020

## 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 a 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](http://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.

### **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 CFP 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.

## **Business Background:**

09/2014 - Present	Investment Adviser Representative Rothman Investment Management
04/2014 - 08/2014	Preparation for starting the business - studying the industry
11/2012 - 03/2014	Equity Analyst Madison Investment Advisors
09/2005 - 10/2012	Equity Analyst Mayo Capital Partners

### **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 is a board member of Sierra Vista Hospital. He attends monthly meetings as a community member to oversee safety, licensing and community issues. He spends 3 hours devoted to this activity during trading hours.

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 in exchange for providing clients advisory services through Rothman Investment Management.

### **Item 6: Supervision**

As the only owner and representative of Rothman Investment Management, 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.