

Item 1 – Cover Page

RSW Investments, LLC

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www.rswinvestments.com

March 21, 2019

This Brochure provides information about the qualifications and business practices of RSW Investments, LLC (“RSW Investments”, “RSW”, the “Firm”, or the “Company”). If you have any questions about the contents of this Brochure, please contact us at (908) 608-9600 or at info@rswinvestments.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.

RSW is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

Additional information about RSW also is available on the SEC’s website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. The CRD number for RSW is 134261.

Item 2 – Material Changes

This Item of the Brochure discusses only specific material changes that are made to the Brochure since our last annual update and provides clients with a summary of such changes. The last annual update of our Brochure was March 14, 2018.

We do not have material changes for our current Brochure, however, please note that we have updated the Assets Under Management information of Item 4 in accordance with the filing of our Annual Updating Amendment on March 21, 2019.

(Brochure Date: 3/21/2019)

(Date of Most Recent Annual Updating Amendment: 03/21/2019)

Currently, our Brochure may be requested by contacting Robert Waas, RSW's Founder, at (908) 608-9600 or at info@rswinvestments.com.

Additional information about RSW is also available via the SEC's web site www.adviserinfo.sec.gov. The SEC's web site also provides information about any persons affiliated with RSW who are registered, or are required to be registered, as investment adviser representatives of RSW.

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Item 4 – Advisory Business

RSW's majority owner is its Founder, Robert S. Waas. RSW has been providing advisory services since February, 2005. As of December 31, 2018, RSW managed approximately \$2.22BB on a discretionary basis.

RSW specializes in the management of municipal bond portfolios, as discussed further below. The vast majority of RSW's clients are referred by a wrap-fee program sponsor or via a third party relationship where RSW has been selected as a sub-adviser. A representative of the applicable Program Sponsor or an independent financial advisor will work with the client to determine the client's investment objectives, risk tolerance, liquidity requirements, investment restrictions and other relevant suitability factors. Based on this information and RSW's investment philosophy and style, the representative or advisor may then recommend placing all or a portion of the client's assets with RSW for management through the Program.

Portfolio Management Services

RSW's fixed-income investment management philosophy focuses on maximizing clients' after-tax total return while employing prudent and predictable risk through focusing on coupon selection and yield curve targeting. Through the use of a Proactive Credit Research Approach, Optimal portfolio structure, and Dynamic Risk Management, RSW attempts to maximize portfolio predictability and dependability.

RSW manages municipal fixed income accounts on a discretionary basis only. RSW broadly distributes 3 general portfolio strategies (Market Duration Portfolio, Low Duration Portfolio, and Enhanced Intermediate Duration Portfolio) which are designed to meet a particular investment goal. Account supervision is guided by the stated objectives of the client (i.e., maximum capital appreciation, growth, income, or growth and income). Once the appropriate portfolio strategy(ies) for a client has been determined by either a client or a client in conjunction with his/her independent financial advisor, RSW continuously manages the client's assets according to the selected strategy(ies). Each client has the opportunity to place reasonable restrictions on the types of investments to be held in the portfolio.

Under certain circumstances, typically for account values in excess of \$5 million (although RSW also provides this service to certain accounts within wrap-fee programs under that minimum), RSW can create a customized investment strategy consistent with the

individual investment objectives and risk tolerances of the client. These separate accounts will be managed versus a customized benchmark.

The Market Duration portfolio has the following characteristics:

- It strives to provide the tax-exempt cash flow of a 10-15 year bond while maintaining a level of volatility that is normally associated with shorter maturity investments.
- A key determinant in RSW's maturity distribution is the slope of the municipal bond yield curve.
- Investment Objective: Maximize after-tax total rate of return.
- Emphasizes high quality (AA Avg.) premium coupon callable municipal bonds with an approximate average maturity of 10-15 years.
- The average call date of each portfolio typically falls within the range of 4 to 6 years.
- Benchmark: Barclays Capital Municipal Bond Index.
- Available Mandates: National, State Preference and State Specific:
 - National Portfolios- comprised of bonds issued in any state without considering the client's state of residence
 - State Preference Portfolios - target a minimum of 50% state specific issues with the remainder invested in out-of-state securities
 - State Specific Portfolios - constructed for clients who reside in a variety of states.
 - RSW's ability to achieve our desired level of investment in a particular state may be impacted by factors such as: high embedded capital gains, the relative value of the target state, and the availability of new issue and/or secondary supply of bonds.
- RSW employs a unique "sale discipline" during periods of rising interest rates. As market yields rise near the bond's stated coupon rate, the price will decline towards par. RSW's strategy targets these "current coupon" bonds for sale as they no longer represent superior income or price stability. RSW then seeks to reinvest the proceeds from the sales in higher coupon callable bonds, thus reinstating the original portfolio structure at current market levels.

The Low Duration Portfolio exhibits the same characteristics as the Market Duration Portfolio, with the key differences being it can only invest in premium coupon callable bonds with stated maturities that cannot exceed 10 years (as opposed to 10-15 years for the Market Duration Portfolio). Furthermore, the average call date structure of each portfolio is shorter than the Market Duration mandates, and typically falls in the range of 2

to 4 years. The benchmark for the Low Duration Portfolio is the Barclays Municipal 3-Year Index.

The core discipline of the Enhanced Intermediate Duration strategy is founded on the investment characteristics of RSW's Market Duration strategy (high quality premium coupon callable bonds maturing between 10-15 years.) However, the Enhanced Intermediate Duration strategy is not held to its more stringent "sale discipline" and maintains broader levels of flexibility to preserve principal and enhance total rate of return opportunities, such as:

- Active duration management.
- Investments in bonds maturing up to 20 years.
- Coupon structure: may target discount, par, and premium coupon bonds and participate in "new issue arbitrage" strategies.
- Short-term tactical US Treasury bond exposure as market conditions warrant.

RSW can also manage each of these primary strategies in a tax efficient manner for clients. Deeply embedded within our investment philosophy is an ability to convert a rising interest rate environment into an opportunity to harvest tax losses and increase coupon income. As a result of rising interest rates, certain securities are flagged to be sold as their prices drop to predetermined levels. By executing these transactions and realizing a capital loss, an asset is created since the loss may be used to offset capital gains. This advantage may not have existed if a buy and hold strategy was in place. The benchmark for the Enhanced Intermediate Duration Portfolio is the Barclays Capital Municipal Bond Index.

For all portfolio strategies, RSW will ensure that the following conditions are met and maintained:

1. RSW manages each client's account on the basis of the client's financial situation and investment objectives and any reasonable investment restrictions the client may impose.
2. RSW obtains sufficient client information to be able to provide individualized investment advice to the client. At least annually, RSW (or a representative of a wrap-fee Program Sponsor as described below) will contact the client to determine whether there have been any changes in the client's financial situation or investment objectives and whether the client wishes to impose investment restrictions or modify existing restrictions.
3. RSW is reasonably available to consult with the client.

4. Each client retains indicia of ownership of the securities and funds in the account, e.g., the ability to withdraw securities, vote securities, among others.

Item 5 – Fees and Compensation

Portfolio Management Services

For those accounts participating in a wrap-fee program to which RSW serves as a Portfolio Manager, RSW is compensated based on a percentage of the market value of each account. This amount typically equals 20% to 50% of the total Program Sponsor's fees. The wrap fee collected by the applicable Program Sponsor includes RSW's advisory fee, the Program Sponsor's fee (which may be shared with an independent referring party), the client's portfolio transactions without commission charge (subject to any restrictions), and custodial services for the client's assets. The billing cycle for Model Portfolio Management clients will be dependent on the wrap program sponsor (i.e. forward or in arrears). RSW does not manage wrap-fee accounts in a manner different to other accounts, whether via a sub-advisory relationship or not.

The Program Sponsor may charge certain additional costs. For a complete description of the fee arrangement including billing practices and account termination provisions, clients should review the applicable Schedule H wrap fee brochure provided to the client by the representative of the Program Sponsor.

RSW's annual fee for its portfolio management services for accounts not introduced through a wrap-fee program will be charged as a percentage of assets under management, generally ranging from 0.15% to 0.30%. RSW agrees on an exact percentage with each client based on both the nature and total dollar value of that account prior to accepting management of the account. In certain circumstances, RSW's fees may be negotiable.

RSW typically requires a minimum account size of \$250,000 for the Market Duration and Low Duration Portfolio. The Enhanced Intermediate Duration portfolio minimum account size is \$500,000. These minimums can be waived under certain circumstances.

A client agreement may be canceled at any time, by either party, for any reason, upon receipt of written notice. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable. (This applies to "wrap account" sponsors who pay RSW for the actual days of portfolio management services provided). The client has the right to terminate an agreement without penalty within five business days after entering into the agreement.

While it is not anticipated that mutual funds will be included in the clients' portfolios, money market mutual funds may be used to 'sweep' unused cash balances until they can be appropriately invested. Clients should recognize that all fees paid to RSW for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee.

Clients should note that similar advisory services may (or may not) be available from other registered investment advisers for similar or lower fees.

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

The fee charged is calculated as described above in Item 5 and is not charged on the basis of a share of capital gains upon or capital appreciation of the funds or any portion of the funds of an advisory client (Section 205(a)(1) of the Investment Advisers Act of 1940, as amended).

Item 7 – Types of Clients

RSW specializes in the professional management of separate account municipal bond portfolios for individual investors. RSW may also provide investment advice to trusts, estates, charitable organizations, and other corporations or business entities.

As disclosed under Item 5, RSW requires a minimum account of \$250,000 for a Market Duration or Low Duration portfolio strategy and a minimum of \$500,000 for a Tax-Exempt Enhanced Intermediate Duration portfolio strategy. However, under certain circumstances these minimums may be waived.

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

RSW's investment philosophy avoids placing bets on the direction of interest rates. Instead, RSW embraces the concept of enhancing wealth by emphasizing three key disciplines:

- Proactive Research Approach

- Optimal Portfolio Structure
- Dynamic Risk Management

Our “Buy Discipline” stresses research efforts which are concentrated on assessing value among high quality bonds by utilizing yield curve, roll down, embedded call option, and horizon analysis. By applying these research techniques, we believe higher stable and consistent returns can be achieved than by lowering our credit quality standards to attain negligible, incremental returns.

RSW utilizes various other tools as sources of information such as Bloomberg and Investor Tools.

While RSW typically follows a long-term investment strategy, on occasion (dependent on the needs of a specific client) RSW may recommend the use of trading (securities sold within 30 days). Because this strategy involves a certain additional degree of risk, it will only be recommended when consistent with the client's stated tolerance for risk.

RSW's security analysis methods include fundamental and technical analysis. The investment strategies used to implement any investment advice given to clients include long term purchases (securities held at least a year), short term purchases (securities sold within a year), and trading (securities sold within 30 days).

Investing in securities involves risk of loss that clients should be prepared to bear.

Risks Specific to Fixed Income Management:

Historically, bonds have indeed provided less volatility and less risk of loss of capital than equity investing. However, there are many factors that may affect the risk and return profile of a fixed income portfolio. The two most prominent factors are interest-rate movements and the credit-worthiness of the bond issuer. Bonds issued by the U.S. government have significantly less risk of default than those issued by corporations and municipalities. However, the overall return on government bonds tends to be less than these other types of fixed-income securities.

Asset-backed securities and mortgage-backed securities are created by pooling loans from a variety of sources and issuing bonds that are backed by these loans. Creditworthiness stems from the credit quality of the underlying loans, as opposed to corporate bonds in which creditworthiness is derived from the earning power of the issuing company. The primary risk of these securities is interest-rate risk. Rising interest rates might cause loan principal prepayments to slow, resulting in less available principal to invest at prevailing higher rates. Conversely, rate decreases might accelerate prepayments, leaving more

dollars to invest at lower rates. Investment grade refers to fixed-income securities rated BBB or better by Standard & Poor's or Baa or better by Moody's.

Convertible securities and preferred stock combine the fixed-income characteristics of bonds with some of the potential for capital appreciation of equities and, thus, may be subject to greater risk than pure fixed-income instruments. Unlike bonds, preferred stock and some convertible securities do not have a fixed par value at maturity, and in this respect may be considered riskier than bonds. Convertible securities may include convertible bonds, convertible preferred stocks and other fixed-income instruments that have conversion features.

Investments in high-yield bonds and convertible securities are subject to the client's authorization, as set forth in the Investment Management Agreement. Such investments may be subject to greater risks than other fixed-income investments. The lower rating of high-yield bonds (less than investment grade) reflects a greater possibility that the financial condition of the issuer or adverse changes in general economic conditions may impair the ability of the issuer to pay income and principal. Periods of rising interest rates or economic downturns may cause highly leveraged issuers to experience financial stress, and thus markets for their securities may become more volatile. Moreover, to the extent that no established secondary market exists, there may be thin trading of high-yield bonds, which increases the potential for volatility.

Item 9 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of RSW or the integrity of the Firm's management. RSW does not have any disciplinary information applicable to this Item to disclose.

Item 10 – Other Financial Industry Activities and Affiliations

Neither RSW nor its management has any affiliations or other financial industry activities.

Item 11 – Code of Ethics

RSW has adopted a Code of Ethics which sets forth high ethical standards of business conduct that RSW requires of its employees, including compliance with applicable federal securities laws. Our Code of Ethics also includes policies and procedures for the review of quarterly securities transactions reports as well as initial and annual securities holdings reports that must be submitted by RSW's covered persons. Among other things, RSW's Code of Ethics also requires the prior approval of any acquisition of securities in a limited offering (e.g., private placement) or an initial public offering. Our code also includes oversight, enforcement, and recordkeeping provisions. A copy of RSW'S Code of Ethics is available to RSW'S advisory clients upon request to the Chief Compliance Officer at RSW'S principal office address.

RSW's Code of Ethics prohibits investment at any time in the same securities that are purchased for client accounts.

Item 12 – Brokerage Practices

RSW will endeavor to select those brokers or dealers which will provide the best services at the lowest commission rates possible. In instances where RSW is aware that the same security is offered by more than one broker/dealer at the same price the following apply: The reasonableness of the commissions are based on the broker's ability to provide professional services, competitive rates, research and other services which will help RSW in providing investment management services to clients.

RSW may at times invest client assets in new issue municipal bonds due to favorable pricing opportunities. As such, RSW's broker/dealer execution selection will be limited to the broker/dealers who are syndicate members of the new issue. While RSW will make every effort to attain best execution on these transactions, the Firm's ability to get multiple quotes will be limited. When secondary municipal bond offerings are utilized in client accounts, RSW as a matter of policy will seek the best execution possible taking into account current market conditions and other alternative investment opportunities. With respect to sale transactions, under normal market conditions, a competitive bidding process is utilized for those securities deemed to be liquid by RSW Investments. Execution via a negotiated sale is permitted for all other instances. In the event that two or more brokers competitively bid identical price levels, RSW will go back to each and request a re-bid. If all brokers again return identical new bids, then a broker is selected randomly.

RSW does not have any soft dollar relationships.

RSW will block trades where possible and when advantageous to clients. This blocking of trades permits the trading of aggregate blocks of securities composed of assets from

multiple clients' accounts so long as transaction costs are shared equally and on a pro-rated basis between all accounts included in any such block. Block trading allows RSW to execute fixed income trades in a more timely, equitable manner and to reduce overall commission charges to clients. However, as per RSW's Code of Ethics (please refer to disclosure under Item 11), no personal trades will ever be included in any client blocks.

“Investible Cash” and Portfolio Restructurings:

Below are the methods that will be employed to allocate bonds for both the investment of “investable cash” and portfolio restructurings. Neither one will have preferential treatment over the other in receiving bonds purchased.

Portfolios with “Investable Cash”: Portfolios with the highest level of cash are “flagged” and analyzed to determine whether they will be allotted any new bonds purchased. Additionally, the following risk parameters are also to be considered in RSW making allocation decisions:

- State exposure (dependent on National / Preference account type)
- Issuer exposure
- Underlying credit quality
- Yield curve exposure
- Sector exposure
- Annual realized / unrealized gain and loss amounts
- Duration (OAD / MDW)

Each targeted portfolio will receive a full allocation of a “block” or “aggregated” purchase as deemed so by RSW based on either the portfolio’s percentage of available cash or the risk parameters above. In the event that a block is too small to accommodate a “full allocation” for all of the selected portfolios’, RSW fills client accounts with the highest cash levels, while also making considerations for the risk parameters (above) and continues allocating bonds until the process is complete.

Portfolios “Flagged” for Restructuring: Additionally, portfolios that are fully invested may be targeted to participate in an exchange of an existing / partial holding(s) for the newly purchased bond. The criteria and order in which portfolios are selected will be determined by factors such as: deviation from the desired level within each of the risk parameters mentioned below (i.e. the portfolios with the greatest deviation are targeted first, etc.)

- State exposure (dependent on National / Preference account type)
- Issuer exposure
- Underlying credit quality
- Yield curve exposure

- Sector exposure
- Annual realized / unrealized gain and loss amounts
- Duration (OAD / MDW)

Restructuring trades are entirely dependent on whether RSW can create capacity for a particular bond in accounts where such bond could be a potential fit. Due to market liquidity, RSW cannot always get an acceptable bid (price) on certain existing client holdings, and without an acceptable offer (quote) RSW cannot sell existing client bonds in order to create capacity in client portfolios for the bonds to be purchased. Therefore RSW quite often selects a larger group of portfolios and securities to potentially sell/restructure than it intends to execute. Only when RSW evaluates the bids received can we determine the most appropriate securities to sell. Those portfolios selected will then receive a full allocation of the “block” or “aggregated” purchase consistent with the percentage of cash capacity created and risk parameters mentioned above. In the event that enough bonds do not exist for a portfolio to receive a “full” allocation, that portfolio will simply receive the final allocation of the balance of the bonds that remain to be allocated.

Electronic Trading Platforms

RSW has begun to execute sales transactions on a regular basis utilizing electronic trading platforms. Given the increasing popularity and related increases in trading volume, a greater share of RSW’s sales transactions will be executed through these platforms. Additionally, the electronic platforms allow RSW to submit a bid “in competition” along with the broker/dealer community if it is decided a particular bond(s) “fit” RSW’s investment criteria at that time a bid list is compiled. This process benefits the seller of the bonds by enhancing best execution, as well as the buyer, who, has the opportunity to purchase bonds that may be relatively scarce in the market place.

Portfolio Management Services Through Various Wrap Fee Programs:

For Program clients, RSW requests that it be provided with written authority to determine the securities to be bought or sold and the amounts of securities to be bought or sold in the client’s Program account. Any limitations on this discretionary authority shall be included in this written authority statement. Clients may change/amend these limitations as required. Such amendments shall be submitted in writing.

Clients participating in wrap-fee Programs to which RSW acts as a Portfolio Manager also agree to direct brokerage in their Program account(s) through the applicable Program Sponsor. Within the various Programs, RSW has the ability to trade away from the Sponsor, which RSW predominately does to enable it access to a greater bond inventory than is typically held by the Sponsor. (While the Program Sponsor typically charges an

additional fee for such trade-aways above and beyond the Program fee, as RSW trades solely in fixed income bonds each Program client receives the same execution on trades placed by RSW through brokers other than the Sponsor as the client would if RSW placed all trades through the Sponsor, and no additional trade away fee is levied to the Program client's account as a result).

The client should, however, consider that, depending upon the level of the wrap fee charged by the broker dealer, the amount of portfolio activity in the client's account, the value of custodial and other services which are provided under the arrangement, and other factors, the wrap fee may or may not exceed the aggregate cost of such services if they were to be provided separately.

Item 13 – Review of Accounts

While the underlying securities within Portfolio Management client accounts are continuously monitored, these accounts will be formally reviewed at least monthly by Rob Waas, Managing Member of RSW Investments, LLC. Various reports and filters are used to highlight deviations from the strategy or desired investment parameters. Reviews focus primarily on the levels of cash, duration, maturity profile, and dollar price of securities. In addition, a comprehensive portfolio attribution analysis is performed for each portfolio that falls outside of a two standard deviation threshold. More frequent reviews may be triggered by material changes in variables such as the client's individual circumstances, or the market, political, or economic environment.

RSW performs the same reviews for any accounts managed within a wrap-fee program to which RSW acts as Portfolio Manager.

In addition to the at least quarterly statements and confirmations of transactions that Portfolio Management clients receive from their broker dealer, RSW will provide a quarterly general market commentary.

Clients of accounts managed within a wrap-fee program to which RSW acts as Portfolio Manager are requested to refer to the applicable Program disclosure document for information on the reports they are to receive from the Program Sponsor. Typically, RSW does not provide any reports to wrap-fee Program clients.

Item 14 – Client Referrals and Other Compensation

RSW does not maintain any solicitation relationships. As disclosed throughout this brochure, RSW acts as a Portfolio Manager within various wrap-fee programs sponsored by third-party companies, as well as providing portfolio management services via sub-advisory relationships, also with third-party companies. For such services, RSW receives a portion of the wrap fee or fee for sub-advisory services.

Item 15 – Custody

RSW does not maintain custody of client funds or securities. Clients should receive at least quarterly statements from the broker/dealer, bank or other qualified custodian that holds and maintains client's investment assets. Upon request RSW may also provide certain account details to the client. Records may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Item 16 – Investment Discretion

RSW requests that it be provided with written authority to determine which securities and the amounts of securities that are bought or sold, as well as the broker dealer to be used and the commission rates to be paid (or markups/markdowns in the case of fixed income investments).

However, as discussed under Item 12, clients participating in wrap-fee Programs to which RSW acts as a Portfolio Manager typically agree to direct brokerage in their Program account(s) through the applicable Program Sponsor. Within the various Programs, RSW has the ability to trade away from the Sponsor, which RSW predominantly does to enable it access to a greater bond inventory than is typically held by the Sponsor. (While the Program Sponsor typically charges an additional fee for such trade-aways above and beyond the Program fee, as RSW trades solely in fixed income bonds each Program client receives the same execution on trades placed by RSW through brokers other than the Sponsor as the client would if RSW placed all trades through the Sponsor, and no additional trade away fee is levied to the Program client's account as a result).

Item 17 – Voting Client Securities

As a matter of firm policy and due to the predominant use of municipal bonds as investment vehicles for client accounts, RSW does not vote proxies on behalf of clients. Clients are responsible for voting their own proxies (as applicable).

Item 18 – Financial Information

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

Robert S. Waas

RSW Investments, LLC

47 Maple Street, Suite 304, Summit, NJ 07901

908-608-9600

March 21, 2019

This Brochure Supplement provides information about Robert Waas that supplements the RSW Investments, LLC (“RSW”) Brochure. You should have received a copy of that Brochure. Please contact Robert Waas, RSW’s Managing Member and Chief Compliance Officer, if you did not receive RSW’s Brochure or if you have any questions about the contents of this supplement.

Additional information about Robert Waas is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Robert S. Waas, born 1960

Post-Secondary Education:

- Graduated from St. John's University in 1982 with a B.S. in Accounting.

Recent Business Background:

- Portfolio Manager of Merrill Lynch Asset Management from 1985 to 1988.
- Senior Portfolio Manager of Colonial Penn Group from 1988 to 1992.
- Portfolio Manager of Van Kampen American Capital from 1992 to 1995.
- Senior Portfolio Manager of Colonial Management from 1995 to 1997.
- Senior Portfolio Manager of Deerfield Capital from 1997 to 2000.
- Managing Director of Prudential Financial from 2000 to 2004.
- CEO/CIO/CCO of RSW Investments, LLC from 2005 to Present.

Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

Item 4- Other Business Activities

None.

Item 5- Additional Compensation

As the majority owner of RSW, Mr. Waas receives an economic benefit on the success of RSW, including new clients and additional assets. He receives no other additional compensation.

Item 6 - Supervision

RSW is a small horizontal organization. As such, we do not conduct our business by appointment at predetermined dates and times. Instead, we converse daily as an investment team about matters that affect our client portfolios. The portfolio management

team is comprised of Robert Waas, team leader, and Matthew Werner. All transactions executed by the team members must conform to the agreed upon strategy. Robert Waas solicits opinions from the team members but is ultimately responsible for setting investment policies. The investment team discusses the vast majority of the bonds before they are purchased or sold, with Robert Waas, CEO/CIO, opining on nearly all transactions before they are executed.

If you need to contact another senior member of RSW regarding Robert Waas, Matthew Werner can be reached at 47 Maple Street, Suite 304, Summit, NJ 07901. Phone number 908-608-9600.

Item 1- Cover Page

Matthew T. Werner, CFA

RSW Investments, LLC

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March 21, 2019

This Brochure Supplement provides information about Matthew Werner that supplements the RSW Investments, LLC (“RSW”) Brochure. You should have received a copy of that Brochure. Please contact Robert Waas, RSW’s Managing Member and Chief Compliance Officer, if you did not receive RSW’s Brochure or if you have any questions about the contents of this supplement.

Additional information about Matthew Werner is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Matthew T. Werner, Born 1979

Post-Secondary Education:

- Graduated from University of Delaware in 2001 with a B.S. in Finance, with minors in Management Information Systems and Economics
- CFA® charterholder since 2017

Recent Business Background:

- Analyst of Prudential Financial from 2001 to 2005.
- Analyst of RSW Investments from 2005 to 2010.
- Portfolio Manager of RSW Investments, LLC from 2010 to 2015.
- Senior Portfolio Manager of RSW Investments, LLC from 2015 to present.

CFA - Chartered Financial Analyst

Issued by: CFA Institute

Prerequisites/Experience Required:

Candidate must meet one of the following requirements:

- Undergraduate degree and 4 years of professional experience involving investment decision-making, or
- 4 years qualified work experience (full time, but not necessarily investment related)

Educational Requirements: Self-study program (250 hours of study for each of the 3 levels)

Examination Type: 3 course exams

Continuing Education/Experience Requirements: None

Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

Item 4- Other Business Activities

None.

Item 5- Additional Compensation

As a minority owner of RSW, Mr. Werner receives an economic benefit on the success of RSW, including new clients and additional assets. With the exception of compensation received as a result of activities described under Item 4 above, Matthew Werner receives no other additional compensation.

Item 6 - Supervision

RSW is a small horizontal organization. As such, we do not conduct our business by appointment at predetermined dates and times. Instead, we converse daily as an investment team about matters that affect our client portfolios. The portfolio management team is comprised of Robert Waas, team leader and Matthew Werner. All transactions executed by the team members must conform to the agreed upon strategy. Robert S. Waas solicits opinions from the team members but is ultimately responsible for setting investment policies. Matthew Werner has the latitude to execute buy and sale transactions that are aligned with RSW's investment philosophy, and account mandate guidelines. In practice however, the investment team discusses the vast majority of the bonds before they are purchased or sold, with Robert Waas, Managing Member, opining on nearly all transactions before they are executed.

If you need to contact another senior member of RSW regarding Matthew Werner, Robert Waas can be reached at 47 Maple Street, Suite 304, Summit, NJ 07901. Phone number 908-608-9600.

RSW Investments, LLC: Privacy Policy Statement

Protecting Your Privacy...at the core of our business

You trust us with your financial and other personal information; we in turn are committed to respect your privacy and safeguard that information. By adhering to the practices described herein we affirm our continuing commitment to protecting your privacy.

Collection and use of personal information

In order to provide you with customized service we collect financial and other personalized information about you from information you provide on applications or other forms (for example, your name, address, social security number and birth date) and information about your transactions with us (for example, details of transactions, account balance, and account number).

Keeping information secure

We maintain physical, electronic and procedural safeguards to protect your financial and other personal information, and we continually assess new technology with the aim of adding new safeguards to those we have in place.

Limiting employee access to information

We limit access to personally identifiable information to only those employees with a business reason to know such information.

Use of personal and financial information by us and third parties

We do not sell non-public personal information about current or former customers or their accounts to any third parties, and do not disclose such information to third parties unless necessary to process a transaction, service an account, or as otherwise permitted by law. Those who may receive this information include the companies that provide transfer agent, technology and administrative services, and printers and mailers that assist us in the distribution of investor materials. These companies will use this information for these services for which we hired them and are not permitted to use this information for any other purpose.

For questions about our policy, or for additional copies of this notice, please write RSW Investments at: 47 Maple Street, Suite 304, Summit, New Jersey 07901 or call 908-608-9600.

Privacy

Policy

As a registered investment adviser, RSW Investments, LLC must comply with SEC Regulation S-P (or other applicable regulations), which requires registered advisers to adopt policies and procedures to protect the “nonpublic personal information” of natural person consumers and customers and to disclose to such persons policies and procedures for protecting that information. Nonpublic personal information includes nonpublic “personally identifiable financial information” plus any list, description or grouping of customers that is derived from nonpublic personally identifiable financial information. Such information may include personal financial and account information, information relating to services performed for or transactions entered into on behalf of clients, advice provided by RSW Investments, LLC to clients, and data or analyses derived from such nonpublic personal information. RSW Investments, LLC must also comply with the California Financial Information Privacy Act (SB1) if the firm does business with California consumers.

Background

The purpose of these privacy policies and procedures is to provide administrative, technical and physical safeguards which assist employees in maintaining the confidentiality of nonpublic personal information collected from the consumers and customers of an investment adviser. All nonpublic information, whether relating to an adviser's current or former clients, is subject to these privacy policies and procedures. Any doubts about the confidentiality of client information must be resolved in favor of confidentiality.

Responsibility

Robert Waas is responsible for reviewing, maintaining and enforcing these policies and procedures to ensure meeting RSW Investments, LLC's client privacy goals and objectives while at a minimum ensuring compliance with applicable federal and state laws and regulations. Robert Waas may recommend any disciplinary or other action as appropriate. Robert Waas is also responsible for distributing these policies and procedures to employees and conducting appropriate employee training to ensure employee adherence to these policies and procedures.

Procedure

RSW Investments, LLC has adopted various procedures to implement the firm's policy and reviews to monitor and insure the firm's policy is observed, implemented properly and amended or updated, as appropriate, which include the following:

Non-Disclosure of Client Information

RSW Investments, LLC maintains safeguards to comply with federal and state standards to guard each client's nonpublic personal information. RSW Investments, LLC does not share any nonpublic personal information with any nonaffiliated third parties, except in the following circumstances:

- As necessary to provide the service that the client has requested or authorized, or to maintain and service the client's account;
- As required by regulatory authorities or law enforcement officials who have jurisdiction over RSW Investments, LLC, or as otherwise required by any applicable law; and
- To the extent reasonably necessary to prevent fraud and unauthorized transactions.

Employees are prohibited, either during or after termination of their employment, from disclosing nonpublic personal information to any person or entity outside RSW Investments, LLC, including family members, except under the circumstances described above. An employee is permitted to disclose nonpublic personal information only to such other employees who need to have access to such information to deliver our services to the client.

Safeguarding and Disposal of Client Information

RSW Investments, LLC restricts access to nonpublic personal information to those employees who need to know such information to provide services to our clients. Any employee who is authorized to have access to nonpublic personal information is required to keep such information in a secure compartments or receptacle on a daily basis as of the close of business each day. All electronic or computer files containing such information shall be password secured and firewall protected from access by unauthorized persons. Any conversations involving non public personal information, if appropriate at all, must be conducted by employees in private, and care must be taken to avoid any authorized persons overhearing or intercepting such conversations.

Safeguarding standards encompass all aspects of the RSW Investments, LLC that affect security. This includes not just computer security standards but also such areas as physical security and personnel procedures. Examples of important safeguarding standards that RSW Investments, LLC may adopt include:

- All RSW personnel are responsible to sign the RSW Privacy Policy Agreement and an annual basis.
- All files containing confidential and sensitive materials are maintained in a locked file cabinet in Waas' office. Files are strictly prohibited from being removed from this office.
- Duplicate copies are created, backed up, and stored on the server on a nightly basis and maintained in a password protected folder on the RSW Network drive.

- Measures to protect against destruction, loss, or damage of customer information due to potential environmental hazards, such as fire and water damage or technological failures (e.g. use of fire resistant storage facilities and vaults; backup and store off site key data to ensure proper recovery); and
- Information systems security should incorporate system audits and monitoring, security of physical facilities and personnel, and contingency planning.

Any employee who is authorized to possess "consumer report information" for a business purpose is required to take reasonable measures to protect against unauthorized access to or use of the information in connection with its disposal. There are several components to establishing 'reasonable' measures that are appropriate for the firm:

- Assessing the sensitivity of the consumer report information we collect;
- The nature of our advisory services and the size of our operation;
- Evaluating the costs and benefits of different disposal methods; and
- Researching relevant technological changes and capabilities.

Some methods of disposal to ensure that the information cannot practicably be read or reconstructed that RSW Investments, LLC may adopt include:

- Procedures requiring the burning, pulverizing, or shredding of papers containing consumer report information;
- Procedures to ensure the destruction or erasure of electronic media; and
- After due diligence, contracting with a service provider engaged in the business of record destruction, to provide such services in a manner consistent with the disposal rule.

Privacy Notices

RSW Investments, LLC will provide each natural person client with initial notice of the firm's current policy when the client relationship is established. RSW Investments, LLC shall also provide each such client with a new notice of the firm's current privacy policies at least annually. If RSW Investments, LLC shares nonpublic personal information relating to a non-California consumer with a nonaffiliated company under circumstances not covered by an exception under Regulation S-P, the firm will deliver to each affected consumer an opportunity to opt out of such information sharing. If RSW Investments, LLC shares nonpublic personal information relating to a California consumer with a non-affiliated company under circumstances not covered by an exception under SB1, the firm will deliver to each affected consumer an opportunity to opt in regarding such information sharing. If, at any time, RSW Investments, LLC adopts material changes to its privacy policies, the firm shall provide each such client with a revised notice reflecting the new privacy policies. The Compliance Officer is responsible for ensuring that required notices are distributed to the RSW Investments, LLC's consumers and customers.

Massachusetts Encryption Requirements

The Massachusetts encryption law states that any correspondence which contains personal client information regarding a Massachusetts resident be encrypted. Effective 2010, RSW has put the following procedures in place to ensure compliance with the law:

New Accounts:

Once Operations receives notification of a new account, check to see if the client resides in MA:

- a. If “YES” > Utilize secure email correspondence using no more than 1 piece of identifying information in both emails and attachments
- b. If “No” > Continue normal new account procedures

Client Inquiries:

RSW will aim to strictly use account numbers only. In instances when a client number and a name are necessary and the client resides in MA, RSW will encrypt the email correspondence. In instances when a client number and a name are necessary and the client resides outside of MA, RSW will send the presentation as is, making every effort to again, not include 2 pieces of identifying information wherever possible.

Receiving emails (performance requests, redemption requests) with both client name / account on it

- When replying, review history and manually remove client name or any other identifying information other than account number in the response (if responding with history).
- If special circumstances require that history cannot be changed, and the email pertains to a MA client, encrypt email.

Internal Email Correspondence:

- If client is a MA resident, aim to strictly use account number only. Else, proceed normally.

- RSW Investments, LLC's policy of prohibiting any client relationships with any prospective client that is governed by ERISA has been communicated to relevant individuals including management, marketing/sales and portfolio managers, among others.
- Robert Waas periodically monitors the firm's advisory services, existing and new client relationships to help ensure that no client relationships are established with ERISA plans.
- In the event of any change in the firm's policy, any such change must be approved by management, and any client relationships with any entity or plan subject to ERISA would only be allowed after appropriate reviews and approvals, meeting strict regulatory requirements and maintaining appropriate bonding and proper records.