

**Schedule F of  
Form ADV**

**Continuation Sheet for Form ADV Part II**

Applicant:	SEC File Number:	Date:
<b>Ronald Joseph Wagner</b>	<b>801-63145</b>	<b>03-30-2010</b>

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: <b>Wagner, Ronald Joseph</b>	IRS Empl. Ident. No.: <b>127-34-4147</b>
Item of Form (identify)	Answer
	<p><u>Common Definitions:</u></p> <p><b>Timing Services</b></p> <p>An Investment program in which a manager utilizes fundamental and /or technical indicators in the attempt to minimize risk and protect principal during declining markets and achieve greater returns during advancing markets. Using investment company securities (such as mutual funds and variable annuities), debt securities, equities, exchange traded funds (commonly referred to as "ETFs") and other securities, the manager switches from equity portfolios to bond or money market during declining markets, and, conversely, from bond and money market funds to equity funds during rising markets. Clients' pay a periodic fee based on a percentage of the market value of the assets managed.</p> <p><b>Asset Allocation Services</b></p> <p>An investment program in which a manager utilizes fundamental and/or technical data in consideration with a client's investment objectives and constraints to allocate assets among several different types of investments company securities in the attempt to achieve greater risk-adjusted returns. Client pays a periodic fee based on a percentage of the market value of the assets managed.</p> <p><b>Private Portfolio Managers</b></p> <p>An investment program in which the client enters into a direct relationship with a stock and/or bond account manager who, for a fee based on a percentage of the assets in the account, manages the portfolio in accordance with investor's objectives and risk tolerance, among other factors. Clients may also incur transaction, commission, custodial, and other costs, depending upon the management program selected.</p> <p>Although these programs are intended to increase returns and/or reduce risk, no guarantees can be made as to their ability to do so. As with any investment program, past performance is no guarantee of future results.</p> <p>Each program may involve different custodial, Administrative and fee arrangements. However, Adviser will not take custody of a client's funds which are designated for an advisory account. Adviser will be paid fees through a direct contract with the client. Clients should be aware that programs substantially the same as, or similar to, those conducted by Adviser may be available elsewhere at a lower fee.</p>

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1.A(1)	<p><b>VISION2020 Advisor Program</b></p> <p><i>Ronald J. Wagner</i> ("Adviser") offers the <b>VISION2020</b> Advisor Program to suitable Clients who seek to maintain an advisory account of load waived and no-load mutual funds and other equity and debt securities. The <b>VISION2020</b> Advisor Program is offered as either a discretionary account, where the Adviser is authorized to manage all trading in the Account without seeking the Client's consent for each transaction, or a non-discretionary account, where the Adviser trades only as the Client approves each transaction. The <b>VISION2020</b> Advisor Program is offered through SagePoint Financial, Inc. ("SPF"), which sponsors the <b>VISION2020</b> Advisor Program and provides certain software and other services to Adviser to operate the <b>VISION2020</b> Advisor Program. A copy of SagePoint Financials, Inc. Advisory Service Brochure will be delivered to the Client in connection with the recommendation of the <b>VISION2020</b> Advisor Program to the Client. The services available to Clients who select the <b>VISION2020</b> Program are described in detail in the SagePoint Financial, Inc. Advisory Service Brochure.</p> <p>The minimum account size to initiate and maintain a <b>VISION2020</b> Advisor Program Account is \$50,000 for a Non-Wrap Fee account and \$100,000 for a Wrap Fee account, which may be deposited in the form of cash or stocks, bonds or load waived or no-load mutual funds or securities. Exception may be made regarding the minimum account size depending on Client circumstances.</p> <p>Pershing provides all custodial and clearing services for <b>VISION2020</b> Advisor Program Accounts. In no event will Adviser accept or maintain custody of the Client funds or securities for a <b>VISION2020</b> Advisor Program Account.</p> <p>When opening a <b>VISION2020</b> Advisor Program Account, the Investment Adviser Representative ("IAR"), as an agent of Adviser and through its affiliation with Adviser, will obtain financial data from the Client and assist in the selection of suitable investment objectives and will base investment strategy on the specific goals and situation of the Client. The IAR on behalf of Adviser will review the Client's Accounts at least quarterly to review the Client's financial situation and goals. The IAR on behalf of the Adviser must remain apprised as to each investment advisory client's ongoing financial status, suitability requirements and investment objectives by reviewing each client's account at least quarterly. The IAR on behalf of the Adviser must contact each client at least annually to review his/her account. The IAR's recommendations on behalf of Adviser for mutual fund investments will be based on research reports and analysis of mutual fund performance and managers, and certain computerized and other models for asset allocation and investment timing. The IAR's recommendations on behalf of Adviser for other securities will be based on publicly available research and reports.</p> <p>Each Client with a <b>VISION2020</b> Advisor Program Account will receive confirmation of every transaction within the account and monthly statements directly from Pershing for any month in which there was account activity. Detailed quarterly performance reports are also available from Adviser through <b>VISION2020</b> Advisor Program.</p> <p>The <b>VISION2020</b> Advisor Program Account is offered alternatively as an account with separate transaction charges (non-wrap fee) or an account with a single fee covering both advisory fees and transaction charges (wrap fee), as described further below. The annual account fee for the <b>VISION2020</b> Advisor Program Account is subject to negotiation, but is generally set as described below:</p>	

Complete amended pages in full, circle amended items and file with execution page (page 1).

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	<p><b>Non-Wrap Fee Option:</b> For Accounts with separate transaction charges, the annualized advisory fee as a percentage of assets in the account is as follows:</p> <table><tr><th>Transaction Charge Account</th><th></th><th></th></tr><tr><td></td><th>Max.</th><td></td></tr><tr><th>Account Size</th><th>Client Fee</th><th>Admin Fee</th></tr><tr><td>\$50,000 - \$99,999.99</td><td>2.500%</td><td>0.250%</td></tr><tr><td>\$100,000 - \$249,999.99</td><td>2.300%</td><td>0.200%</td></tr><tr><td>\$250,000 - \$499,999.99</td><td>2.050%</td><td>0.175%</td></tr><tr><td>\$500,000 - \$749,999.99</td><td>1.800%</td><td>0.150%</td></tr><tr><td>\$750,000 - \$1,249,999.99</td><td>1.550%</td><td>0.125%</td></tr><tr><td>\$1,250,000 - \$1,999,999.99</td><td>1.300%</td><td>0.100%</td></tr><tr><td>\$2,000,000 - \$4,999,999.99</td><td>1.050%</td><td>0.075%</td></tr><tr><td>\$5,000,000 - \$24,999,999.99</td><td>1.050%</td><td>0.050%</td></tr><tr><td>Over \$25 MM</td><td>0.800%</td><td>0.025%</td></tr></table>	Transaction Charge Account				Max.		Account Size	Client Fee	Admin Fee	\$50,000 - \$99,999.99	2.500%	0.250%	\$100,000 - \$249,999.99	2.300%	0.200%	\$250,000 - \$499,999.99	2.050%	0.175%	\$500,000 - \$749,999.99	1.800%	0.150%	\$750,000 - \$1,249,999.99	1.550%	0.125%	\$1,250,000 - \$1,999,999.99	1.300%	0.100%	\$2,000,000 - \$4,999,999.99	1.050%	0.075%	\$5,000,000 - \$24,999,999.99	1.050%	0.050%	Over \$25 MM	0.800%	0.025%
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	<p>The advisory fee is payable quarterly in advance. The initial fee is payable when the <b>VISION2020</b> Advisor Program Account is established, pro-rated for the first partial quarter, if any. Thereafter, fees will be payable on the first day of each calendar quarter based on the asset value of the <b>VISION2020</b> Advisor Program Account as of the last business day of the prior quarter. Additional deposits to the account are subject to the same fee procedures. Notwithstanding the foregoing, no Advisory fees will be charged on any mutual funds, unit investment trusts or annuities transferred to the <b>VISION2020</b> Program Account which were purchased within the past two years if a commission was paid to Adviser in its role as a broker-dealer or to Client's IAR at another broker-dealer. In addition to the advisory fee, separate transaction charges are payable pursuant to a fixed schedule for trade execution. These transactions charges are paid to Pershing and are primarily retained by Pershing, although a portion may be re-allowed to SPF. These transaction charges represent payment to SPF and Pershing for brokerage services and to SPF for execution supervisory services. The Client should consider that depending upon the level of the advisory fee charged, the amount of portfolio activity in the Client's account, the value of services that are provided under the Program, and other factors, the Program fee may or may not exceed the aggregate cost of such services if they were to be provided separately. The Client should further consider that if the IAR pays the transaction charges, those charges may be lower than the transaction charges that would otherwise be payable by the Client under a retail brokerage agreement. Also, if the IAR pays the transaction charges rather than SPF, the IAR will retain a higher portion of the total advisory fee paid by the Client because the administrative fee paid to SPF will be lower than if SPF directly paid the transaction charges.</p>																																				

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	<p><b><u>TRANSACTION CHARGES</u></b></p> <p>In addition to the advisory fee, the following transaction charges will apply on all securities transactions conducted within the Account:</p> <table border="1"> <thead> <tr> <th></th> <th><b>VISION2020 Advisor</b></th> </tr> <tr> <th></th> <th>Client Schedule</th> </tr> </thead> <tbody> <tr> <td><b><u>Stock &amp; Bond Transactions:</u></b></td> <td></td> </tr> <tr> <td><b><u>Listed Equities</u></b></td> <td>\$25.00</td> </tr> <tr> <td><b><u>OTC Equities</u></b></td> <td>\$25.00</td> </tr> <tr> <td><b><u>Options Equity &amp; Index</u></b></td> <td>\$30.00</td> </tr> <tr> <td><b><u>Exercises &amp; Assignments</u></b></td> <td>same as OTC</td> </tr> <tr> <td><b><u>Listed Bonds</u></b></td> <td>\$35.00</td> </tr> <tr> <td><b><u>Bonds (Corp., Treas., Muni., MM)</u></b></td> <td>\$35.00</td> </tr> <tr> <td><b><u>CDs</u></b></td> <td>\$35.00</td> </tr> <tr> <td><b><u>UITs</u></b></td> <td>\$35.00</td> </tr> <tr> <td><b><u>Load Mutual Funds:</u></b></td> <td></td> </tr> <tr> <td><b><u>Purchase/Redemption</u></b></td> <td>\$15.00</td> </tr> <tr> <td><b><u>Dollar Cost Avg.</u></b></td> <td>\$1.50</td> </tr> <tr> <td><b><u>Systematic Redemption</u></b></td> <td>\$1.50</td> </tr> <tr> <td><b><u>Internal Exchanges</u></b></td> <td>\$5.00</td> </tr> <tr> <td><b><u>No Load Mutual Funds:</u></b></td> <td></td> </tr> <tr> <td><b><u>Purchase/Redemption</u></b></td> <td>\$20.00</td> </tr> </tbody> </table> <p>Ancillary charges such as Account fees or transfer costs are not included in the wrap fee.  <b>Wrap Fee Option:</b> For accounts where a single fee includes all advisory and transactional charges, the annualized advisory fee as a percentage of assets in the account is as follows:</p>		<b>VISION2020 Advisor</b>		Client Schedule	<b><u>Stock &amp; Bond Transactions:</u></b>		<b><u>Listed Equities</u></b>	\$25.00	<b><u>OTC Equities</u></b>	\$25.00	<b><u>Options Equity &amp; Index</u></b>	\$30.00	<b><u>Exercises &amp; Assignments</u></b>	same as OTC	<b><u>Listed Bonds</u></b>	\$35.00	<b><u>Bonds (Corp., Treas., Muni., MM)</u></b>	\$35.00	<b><u>CDs</u></b>	\$35.00	<b><u>UITs</u></b>	\$35.00	<b><u>Load Mutual Funds:</u></b>		<b><u>Purchase/Redemption</u></b>	\$15.00	<b><u>Dollar Cost Avg.</u></b>	\$1.50	<b><u>Systematic Redemption</u></b>	\$1.50	<b><u>Internal Exchanges</u></b>	\$5.00	<b><u>No Load Mutual Funds:</u></b>		<b><u>Purchase/Redemption</u></b>	\$20.00
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	<p>Clients are under no obligation to accept recommendations by Advisor or authorize transactions through Advisor, related persons of Advisor, or SagePoint Financial, Inc.. Clients may be able to purchase recommended no-load mutual funds outside the Advisor's program at little or no transaction cost and without the Advisor's advisory fees.</p> <p>Client's should be aware that, in addition to the investment advisory fees paid by the client in connection with the Advisor's investment management services, each investment company (i.e. mutual fund) also pays it's own separate investment advisory management fees and other expenses.</p> <p>At the Client's option, a quarterly report will be generated by Pershing, which is in addition to monthly account statements. This report provides a market perspective on the most recently completed quarterly activity, and a portfolio performance summary using standard &amp; Poor 500 and Lehman Brothers Bond Indices as benchmark comparisons. The report also reflects holdings by asset type, contributions, withdrawals, and a description of each position held with value, gain and loss, and yield information.</p> <p>The following are specifics regarding the two managed account options available:</p> <p><u><b>OPTION A</b></u></p> <p>This managed account with Pershing has a minimum initial account size of \$50,000. To the extent that general securities transactions (i.e., stocks, bonds, etc.) will be executed only through SagePoint Financial, Inc. and Pershing. General securities transactions are not assessed a commission, but are subject to minimum transaction charges by SagePoint Financial, Inc. and Pershing which are paid by the client according to the following fee schedule:</p> <table border="0"> <tr> <td>Listed Equities</td> <td>\$25, plus .025 per share</td> </tr> <tr> <td>OTC</td> <td>\$27</td> </tr> <tr> <td>Bonds</td> <td>\$45</td> </tr> <tr> <td>Options</td> <td>\$28, plus \$1.50 per contract</td> </tr> </table> <p>*All stock, bond and option trades will incur an additional \$3.50 for confirmation charges.</p> <p>Certain "load" mutual funds may be transacted in the Client's account at Net Asset Value ("NAV") without a commission charged to the client. The NAV load mutual funds hereafter referred to as "NAV Funds." Any Rule 12(b)-1 or service fees paid by NAV Funds, will be retained by SunAmerica. SunAmerica will assess a transaction charge of \$15 to Advisor for each NAV fund transaction in excess of 10 during the referenced twelve-month period. A transition charge of \$20 will be assessed to Advisor for each no-load transaction. The fact that Advisor pays these transaction charges may affect the frequency of transactions recommended by the Advisor to Client.</p> <p>The annual charge for the quarterly reporting service begins at .14% (14/100 of 1%) and is reduced based on size of account. The charge is deducted from management fees charged to the client's account.</p> <p>If the quarterly report option is not elected, an annual charge for the service of automated billing will be deducted from management fees charged to the client's account. The annual charge for this service begins at .06% (6/100 of 1%) and is reduced based on the size of the account. The</p>	Listed Equities	\$25, plus .025 per share	OTC	\$27	Bonds	\$45	Options	\$28, plus \$1.50 per contract
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	<p>annual charge for automated billing is included in the charge for optional quarterly reporting if elected.</p> <p><i>Quarterly reporting is not available for accounts that hold options and/or margins.</i></p> <p><b>OPTION B</b> (This option cannot be used for ERISA or IRA accounts)</p> <p>This managed account with Pershing has a minimum initial account size of \$25,000. To the extent that general securities transactions (i.e., stocks, bonds, etc.) will be executed through SagePoint Financial, Inc. and Pershing. General securities transactions are not assessed a commission, but are subject to minimum transaction charges by SunAmerica and Pershing which are paid by the Client according to the following fee schedule:</p> <table> <tr> <td>Listed Equities</td> <td>\$25, plus .025 per share</td> </tr> <tr> <td>OTC</td> <td>\$27</td> </tr> <tr> <td>Bonds</td> <td>\$45</td> </tr> <tr> <td>Options</td> <td>\$28, plus \$1.50 per contract</td> </tr> </table> <p>*All stock, bond and option trades will incur an additional \$3.50 for confirmation charges.</p> <p>Certain "load" mutual funds may be transacted in the client's account at Net Asset Value ("NAV"). The NAV load mutual funds are hereafter referred to as "NAV Funds". A portion of any Rule 12(b)-1 of service fees paid by NAV Funds to AIG Financial Advisors, Inc. may be re-allowed to the SagePoint Financial, Inc. registered representative on the account. SagePoint Financial, Inc. will assess a transaction charge of \$15 to Client for each NAV Fund transaction. A transaction charge of \$20 will be assessed to Client for each no-load transaction, however certain no-load mutual funds are available without transaction charges.</p> <p>The annual charge for this quarterly reporting service is \$150. The fee is charged \$37.50 per quarter to the client's account.</p> <p><i>Quarterly reporting is not available for accounts that hold options and/or margin.</i></p> <p>There is an annual administrative charge beginning at .25% (1/4 of 1%) and is reduced by the size of the account. This charge is deducted from management fees charged to the client's account.</p> <p><b>FEES:</b> - ongoing fees for the Investment Management Service are calculated as a percentage of assets under management. The maximum fee schedule is as follows:</p> <p><b>OPTION A</b> Minimum Balance of \$50,000</p> <table> <tr> <th><u>Assets under Management</u></th> <th><u>Annual Fee</u></th> <th><u>Minimum Annual Fee</u></th> </tr> <tr> <td>First \$250,000</td> <td>2.2%</td> <td>.50%</td> </tr> <tr> <td>250,000 to 500,000</td> <td>1.8%</td> <td>.50%</td> </tr> <tr> <td>500,000 to 1,000,000</td> <td>1.5%</td> <td>.50%</td> </tr> <tr> <td>over 1,000,000</td> <td>1.2%</td> <td>.50%</td> </tr> </table>		Listed Equities	\$25, plus .025 per share	OTC	\$27	Bonds	\$45	Options	\$28, plus \$1.50 per contract	<u>Assets under Management</u>	<u>Annual Fee</u>	<u>Minimum Annual Fee</u>	First \$250,000	2.2%	.50%	250,000 to 500,000	1.8%	.50%	500,000 to 1,000,000	1.5%	.50%	over 1,000,000	1.2%	.50%
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**Schedule F of  
Form ADV**

**Continuation Sheet for Form ADV Part II**

Applicant:	SEC File Number:	Date:
<b>Ronald Joseph Wagner</b>	<b>801-63145</b>	<b>03-30-2010</b>

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

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	<p><b>OPTION B</b> Minimum Balance of \$25,000</p> <table> <thead> <tr> <th><u>Assets under Management</u></th> <th><u>Annual Fee</u></th> <th><u>Minimum Annual Fee</u></th> </tr> </thead> <tbody> <tr> <td>First \$250,000</td> <td>2.2%</td> <td>.50%</td> </tr> <tr> <td>250,000 to 500,000</td> <td>1.8%</td> <td>.50%</td> </tr> <tr> <td>500,000 to 1,000,000</td> <td>1.5%</td> <td>.50%</td> </tr> <tr> <td>over 1,000,000</td> <td>1.2%</td> <td>.50%</td> </tr> </tbody> </table> <p>Fees for Advisor's Investment Management Services are billed quarterly in advance. Fees are calculated by using the following formula:</p> $\frac{\text{TAV} \times \text{fee schedule \%} \times \text{number of days in quarter}}{\text{Number of days in year (365)}} = \text{Total quarterly Fee}$ <p>The total asset value is based on the market close on the last business day of the immediately completed calendar quarter. The management fee for the first billing will be prorated for accounts that are placed under management after the beginning of the quarter. If assets are deposited after the inception of a quarter, the fee chargeable with respect to such assets as of the next calculation date will be prorated based on the number of days during the quarter the assets were held in the account. For valuation purposes the assets will be treated as if they were held in the account as of the end of the quarter. Client will be entitled to a pro rata refund of any pre-paid quarterly fee based upon the number of days remaining in the quarter after termination.</p> <p>Adviser also offers the SEI Asset Management Program (the "Program") to its clients. The Program is designed as follows:</p> <ol style="list-style-type: none"> <li>1) Determine the investor's risk profile and investment objectives. Adviser determines the investor's investment objectives, investment time horizon, and risk profile by means of an interview process and the completion of a questionnaire.</li> <li>2) Set a relevant asset allocation policy for the investor. The investor chooses one of many mutual fund asset allocation models. The investor may also purchase the individual mutual funds without choosing one of the asset allocation models. If the investor so chooses, automatic re-balancing to model allocation and recommended model allocation changes will not be available.</li> <li>3) Diversify among asset classes and styles. The investment managers of the underlying mutual funds are selected by SEI Investment Management Corporation. SEI utilizes institutional investment styles and performance remains consistent with the objectives of the mutual funds.</li> <li>4) Rebalance the investor's portfolio. Re-balancing maintains the proper allocation to each asset class in the model. Re-balancing occurs automatically if the underlying mutual funds deviate from the prescribed quarterly allocation by greater than a 2% variance. For the tax-managed models, the variance is 3%. Re-balancing occurs monthly with no transaction fees.</li> </ol>		<u>Assets under Management</u>	<u>Annual Fee</u>	<u>Minimum Annual Fee</u>	First \$250,000	2.2%	.50%	250,000 to 500,000	1.8%	.50%	500,000 to 1,000,000	1.5%	.50%	over 1,000,000	1.2%	.50%
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**Schedule F of  
Form ADV**

**Continuation Sheet for Form ADV Part II**

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(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

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1A3	<p>5) Report results. SEI Trust Company (a subsidiary of SEI Investments Company) acts as the transfer agent and custodian for the investor's account. SEI Trust Company provides reporting services including consolidated monthly statements, quarterly performance reports, and year-end tax reports.</p> <table border="0"> <tr> <td>Market Value Breakpoint</td> <td>Adviser Maximum Annual Fee</td> </tr> <tr> <td>On the first \$250,000</td> <td>2.25</td> </tr> <tr> <td>On the next \$250,000</td> <td>2.15</td> </tr> <tr> <td>On the next \$500,000</td> <td>2.05</td> </tr> <tr> <td>On the next \$1,000,000</td> <td>1.95</td> </tr> <tr> <td>Thereafter</td> <td>1.85</td> </tr> </table> <p>SEI Trust Company will debit the investor's account on a quarterly basis for the above-mentioned fees and charges. (See Corporate Investment Advisory Agreement for determination of fees.) The charges to the account will be on an arrears basis and will be remitted quarterly net of any applicable account and performance reporting charges not charged to the customer. Upon written notification, the agreement may be terminated by either Adviser or the investor. Prorated fees will be charged based on market value on the date notice is received.</p> <p>The client will receive statements from the SEI Trust Company indicating holdings. A quarterly report, indicating market value, cash flows, gains and losses, asset allocation, and performance as it relates to market indices, is also available if the investor elects to receive it. Annually, the client will receive a tax report for the account.</p> <p>The SEI Asset Management program is a program whereby an independent investment adviser can make the SEI family of mutual funds available to its clients. SEI is not an investment adviser in this instance and does not have the investment adviser relationship with the client. Although, SEI re-balances the client's portfolio, to maintain the proper asset allocation to each asset class in the percentages chosen by the client SEI does not exercise discretion when providing re-balancing services. SEI rebalances pursuant to the client's written instruction.</p> <p>Adviser charges an advisory fee. SEI charges an expense ratio to the fund; all expense ratios are disclosed in the prospectuses of the funds. SEI Trust Company, a subsidiary of SEI Investments Co. acts as the transfer agent and custodian for the client's account. The advisory fee is debited from the customer account by SEI Trust Company on behalf of the customer and Adviser. SEI does not participate in the advisory fee. SEI Trust Company then forwards the fee to SPF as paying agent for Adviser. SPF deducts its processing fee and forward the advisory fee to Adviser.</p> <p>Clients sign an advisory contract with Adviser and account open tin documentation with SEI. Adviser provides their Form ADV and SEI provides a prospectus for the mutual funds utilized in the fee based account. As custodian, SEI Trust Company provides all reporting functions for the account, and supplies the client with at least a quarterly statement. SEI does not act in the capacity of an investment adviser to the client and therefore does not provide a solicitor's agreement, or their Form ADV Part II. The fee schedule that the Adviser Charges for their advisory services in connection with the SEI Asset Management Program is included in Schedule F and in the SEI Advisory Agreement for client disclosure.</p> <p>If client opens a Tax Controlled Program Investment Account, SEI will remain as the Investment</p>		Market Value Breakpoint	Adviser Maximum Annual Fee	On the first \$250,000	2.25	On the next \$250,000	2.15	On the next \$500,000	2.05	On the next \$1,000,000	1.95	Thereafter	1.85
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**Schedule F of  
Form ADV**

**Continuation Sheet for Form ADV Part II**

Applicant:	SEC File Number:	Date:
<b>Ronald Joseph Wagner</b>	<b>801-63145</b>	<b>03-30-2010</b>

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

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Item of Form (identify)	Answer	
	<p>Adviser on the account, and Adviser will act in solicitor capacity only and have client sign the appropriate documentation.</p> <p><u>Types of Programs provided by Applicant:</u></p> <p>Adviser may reduce risk through the use of cash and other risk lowering strategies during certain market cycles.</p> <p>Adviser provides an investment program in which a manager utilizes fundamental and/or technical data in consideration with a client's investment objectives and constraints to allocate assets among several different types of investments company securities in the attempt to achieve greater risk-adjusted returns. Client pays a periodic fee based on a percentage of the market value of the assets managed or on case-by-case basis a fixed fee may be charged.</p> <p><b><i>Private Portfolio Managers</i></b></p> <p>An investment program in which the client enters into a direct relationship with a stock and/or bond account manager who, for a fee based on a percentage of the assets in the account, manages the portfolio in accordance with investor's objectives and risk tolerance, among other factors. Clients may also incur transaction, commission, custodial, and other costs, depending upon the management programs structure as developed with the client.</p> <p>Important Information Regarding Programs that Provide advice on Investment Company Securities.</p> <p>Certain programs provide assets allocation or market timing advice in regard to investment company securities. In addition, the Adviser's programs provide services relative to a number of no-load mutual funds. The client should be aware that, in addition to the investment advisory fees paid by the client in connection with these programs, each investment company in which program assets are invested also pays its own separate investment advisory fees and other expenses.</p> <p>Adviser offers investment advice in regard to the client's selection of no-load mutual funds. In all other regards, Adviser's advisory function is limited to assistance in the selection of advisers who may manage assets for clients using some or all of the listed types of investments. Clients should refer to the relative adviser's Form ADV, Part II or equivalent disclosure document for information regarding types of investments for which the adviser provides investment advice.</p> <p>Adviser would provide limited financial planning and investment advisory services to clients in the following ways:</p> <p>1. Limited Financial planning is offered when the client's needs are not comprehensive in nature. The plan prepared is narrow in scope and may focus on one or several of the following areas. Examples are objectives, asset/liability analysis, tax planning, cash flow management, investment planning, asset allocation, investment selection, portfolio rebalancing, retirement planning, use of cash as risk avoidance strategy, fringe benefits analysis, estate transfer and business considerations.</p> <p>Clients that request additional services may also arrange to have special reports or analysis prepared. These might include analysis of group benefit programs, qualified retirement plan design, portfolio analysis, etc. Fees for limited planning or to develop reports are based on an</p>	

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**Schedule F of  
Form ADV**

**Continuation Sheet for Form ADV Part II**

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	<p>hourly rate of \$100 to \$400 per hour. Adviser also has a limited number of fixed fee financial planning clients.</p> <p>Seminars of a general nature may be held. No fees will be charged.</p> <p>2. The Adviser regularly recommends that clients invest in certain "no-load" mutual funds. All mutual fund transactions are executed with the knowledge and authorization of the client. In no case does the Adviser have discretionary authority over the client's investments.</p> <p>The Adviser and Related persons of the Adviser are affiliated with SagePoint Financial, Inc., a NASD member broker/dealer and thus subject to the regulatory jurisdiction of the NASD in regard to the execution of securities transactions. To comply with NASD requirements, all no-load mutual fund transactions effected by the Adviser will be executed through SagePoint Financial, Inc. This will be executed in an account established on a fully disclosed basis with the Pershing Division of Donaldson, Lufkin, &amp; Jenrette Securities Corporation ("Pershing") or through an account established at Charles Schwab and Co., Inc. ("Charles Schwab"). Transaction fees may be charged by Pershing, Charles Schwab and SunAmerica Trust Company for these no-load mutual fund transactions.</p> <p>Adviser and related persons of the Adviser do not participate in transaction fees charged by Pershing and Charles Schwab. in regard to no-load mutual fund transactions. However, a portion of the transaction fee may be re-allowed to SagePoint Financial, Inc.</p> <p>Clients are under no obligation to accept recommendations made by Adviser or effect transactions through Adviser, related persons of Adviser, or SagePoint Financial, Inc. Clients may be able to purchase recommended no-load funds outside of the Adviser's program at little or no transaction cost and without the Adviser's advisory fee.</p> <p>The Adviser provides advice in regard to investment company securities (i.e., "mutual funds"). The client should be aware that, in addition to the investment advisory fees paid by the client in connection with the Adviser's program, each investment company also pays its own separate investment advisory (i.e., management) fees and other expenses. Upon written notification of termination, client will be entitled to a pro rata refund of any pre-paid quarterly fee based upon the number of days remaining in the quarter after termination.</p>	
1.A.7.	Adviser provides Life insurance services as part of a financial or estate plan where and when appropriate.	
1.A.9	<p><b>Adviser</b> may enter into agreements with various third-party investment advisers. Under these agreements, <b>Adviser</b> offers customers various types of programs sponsored by these advisers. All third-party investment advisers to whom <b>Adviser</b> will refer customers will be licensed as investment advisers by the state of California or registered investment advisers with the Securities and Exchange Commission.</p> <p>After gathering information about a customer's financial situation and investment objectives, a</p>	

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**Schedule F of  
Form ADV**

**Continuation Sheet for Form ADV Part II**

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	<p>representative of <b>Adviser</b> will assist the customer in selecting a particular third-party program. <b>Adviser</b> receives compensation pursuant to its agreements with these third-party advisers for introducing customers to these third-party manager, is typically equal to a percentage of the investment advisory fee charged by that third-party adviser or a fixed fee.</p> <p>Because <b>Adviser</b> and its representative receive compensation from the third-party advisers for referring customers and because such compensation may differ depending upon the individual agreement with each third-party adviser, <b>Adviser</b> and/or its representative may have an incentive to recommend one of these third-party advisers over other third-party advisers with which it has less favorable compensation arrangements or other advisory programs offered by third-party advisers with which it has no compensation arrangements.</p> <p>Since the fee for the investment advisory services of <b>Adviser</b> is paid by the independent third-party adviser, the fee paid to <b>Adviser</b> is not negotiable. Fees paid by customers to independent third-party advisers are established and payable in accordance with the Form ADV Part II or other equivalent disclosure provided by each independent third-party adviser to whom <b>Adviser</b> refers its customers, and may or may not be negotiable, as disclosed in the disclosure documents of the third-party adviser.</p> <p>Certain programs may charge a "wrap fee." Selection of a "wrap fee" program may result in the payment of fees by customers in excess of the combined total of separate advisory fees and brokerage commissions paid on a transactional basis. If a "wrap fee" program is not selected, the customer may incur additional fees, in addition to the fees charged by third-party investment advisers, customers may be charged transaction charges by securities broker-dealer with whom certain associated persons of <b>Adviser</b> are associated, may receive transaction charges, a portion of which may be paid to the associated persons of <b>Adviser</b> in their capacities as associated persons of SPF</p> <p>Customers who are referred to third-party investment advisers will receive full disclosure, including services rendered and fee schedules, at the time of the referral, by delivery of a copy of the relevant third-party adviser's Form ADV Part II or equivalent disclosure document at the same time as the Form ADV Part II or equivalent disclosure document of <b>Adviser</b>. In addition, if the investment program recommended to a customer is a wrap fee program, the customer will also receive the SagePoint Financial, Inc. Advisory Service Brochure or equivalent wrap fee brochure provided by the sponsor of the program. <b>Adviser</b> will provide to each customer all appropriate disclosure statements, including disclosure of solicitation fees to <b>Adviser</b> and its Advisory Representatives as required by Securities and Exchange Commission Rule 206(4)-3.</p> <p>Customers will sign an advisory agreement with <b>Adviser</b> and will also sign an advisory agreement directly with the third-party adviser of the program selected. The advisory relationship may be terminated by the customer, <b>Adviser</b> or the third-party adviser in accordance with the provisions of those agreements. The customer will typically receive a pro rata refund of any prepaid advisory fees upon termination of an advisory agreement. Additionally, a customer may terminate its advisory relationship with <b>Adviser</b> without being assessed any penalty within five (5) business days of its signing an advisory agreement.</p> <p>The representative of <b>Adviser</b> will attempt to contact the customer at least quarterly, and inquire about changes in the customer's financial situation and needs or investment objectives. In</p>	

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**Schedule F of  
Form ADV**

**Continuation Sheet for Form ADV Part II**

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Item of Form (identify)	Answer	
	addition, the representative will meet with the customer at least annually to review any changes in the customer's financial situation, needs or investment objectives, as well as the performance of the programs managed by the third-party investment adviser. A representative will be available for the customer's consultation during normal business hours.	
1.C.	<p>Fees will not be based upon a share of capital gains or appreciation of the funds or any portion of the funds of an advisory client. All fees paid to the Adviser for advisory services are separate from the fees and expenses charged to shareholders of mutual funds by mutual funds, or by the investment advisor managing the portfolios, and a complete explanation of these expenses charged by the mutual funds are contained in each prospectus. Clients are encouraged to read the fund prospectus.</p> <p>When advisory contract is in place, fees will be reduced for any commissions received by the Principal and/or associates of the Adviser.</p>	
3. K.	Other partnerships include those investing in Equipment Leasing, Research and Development, Cable Television, Television Stations, Trust Deeds and Mortgages, Entertainment (movies), Agriculture and Ranching, and Natural Resources.	
4.A.5 4.B.8	<p>For the Advisory Referral Program, <b>Adviser</b>' recommendations for third-party advisers and programs will be based on research reports and analysis of performance provided by third-party advisers and publicly available research and reports regarding investment strategies and programs generally offered by a variety of third-party investment advisers. Representatives of <b>Adviser</b> may utilize computer software programs provided by such third-party advisers in providing this advice to customers.</p> <p>Adviser, may reduce risk through the use of cash and other risk lowering strategies during certain market cycles.</p> <p>Adviser provides an investment program in which a manager utilizes fundamental and/or technical data in consideration with a client's investment objectives and constraints to allocate assets among several different types of investments company securities in the attempt to achieve greater risk-adjusted returns. Client pays a periodic fee based on a percentage of the market value of the assets managed or on case-by-case basis a fixed fee may be charged.</p>	
4. B.	We subscribe to both general business and industry specific publications, such as The Wall Street Journal, Financial Planning, Morningstar, technical charting services and others. We also review numerous publications provided by companies, primarily in the form of prospectuses from various product companies.	
5.	Persons associated with Adviser generally possess at least a B.A. or B.S. degree and are Registered Representative. In addition individuals may also have advanced credentials or designations such as CFP®.	
6.	<p><b>Ronald J. Wagner was born on January 10, 1944.</b></p> <p><u>Education and Business background.</u></p>	

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**Schedule F of  
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Item of Form (identify)	Answer
	<p>Education:</p> <p>B.S. Management Science, University of Buffalo, N.Y. Internal Consultant Training Chevron USA S65, S63, S24, S7 and CA Insurance Lic # 0A05208</p> <p>Business Background:</p> <p>Current affiliation is with SagePoint Financial, Inc., as a Registered Principal and Past OSJ-Branch Office Manager. Investment Adviser Representative with Ronald Joseph Wagner</p> <p>Past affiliation with Linsco/Private Ledger, Inc. as a Registered Representative.</p> <p>Prior employment history &amp; business background</p> <p><u>Contracts Administrator (Chevron Refinery)</u></p> <p><u>Internal Quality Improvement Consultant (Chevron)</u></p> <p><u>Analyst Planning and Analytical Division (Chevron)</u></p> <p><u>Refinery Superintendent (Pennzoil Company)</u></p> <p><b>Steve D. Loftin was born on February 15, 1941</b></p> <p><u>Education and Business background</u></p> <p>Education:</p> <p>HS Diploma 1959, Wapato High School AA 1961, Yakima Community College B.S. Mechanical Engineer 1964, University of Washington S65, S63, S7 and CA Insurance Lic # 0B15289</p> <p>Business Background</p> <p>Registered Representative with SagePoint Financial, Inc. Investment Adviser Representative with Ronald Joseph Wagner Engineer and Management with Chevron USA from April 1964 thru June of 1992.</p> <p>From April 1964 to June 1992 served in various professional assignments at several facilities of Chevron U. S. A. including the Richmond, California Refinery, one of the world's largest manufacturing complexes.</p> <p>Engineer</p> <ul style="list-style-type: none"> <li>* Responsible for design and construction of Refinery capital projects \$5m to \$3mm.</li> <li>* Engineered and coordinated plant turnarounds of \$100m to \$6mm.</li> </ul>

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Item of Form (identify)	Answer
	<p>Engineering Supervisor * Responsibilities included supervision of 5-10 engineers performing capital projects and turnarounds.</p> <p>Plant Operating Supervisor * Responsible for all facets of manufacturing operation, including budgets, personnel, equipment, plant throughputs and product demands for several different multi-plant complexes valued up to \$500mm.</p> <p>Terminal Superintendent * Responsible for all facets of Refinery Wharf operation * Responsibilities included loading and unloading petroleum products from ships and barges, oil spill cleanup (refinery representative on San Francisco Bay Area oil spill clean-up coop) all personnel items (hiring, labor negotiations shift scheduling, etc) for approx. 10 supervisors and 50 union represented operators, setting and meeting yearly budget of \$5-\$10mm.</p> <p>Maintenance Superintendent * Responsible for 50 supervisors and 300-800 hourly workers. * Planned and executed plant turnarounds of \$50m to \$15mm. * Planned and executed plant construction projects of \$25m to \$2mm. * Responsibilities included setting and coordinating the Refinery maintenance budget \$50- \$120mm per year.  <ul style="list-style-type: none"> <li>Responsibilities included hiring, training, scheduling, serving on personnel committee (salary administration, promotions, training assignments, etc.), and labor negotiations (including disciplinary and termination cases)</li> </ul> </p> <p><b>Jill Ann Guintu was born October 10, 1967.</b></p> <p><u>Education and Business Background.</u></p> <p>Education</p> <p>H.S. Diploma, College Park High School, Pleasant Hill, Ca. AA, Diablo Valley College, Pleasant Hill, Ca. BS. International Business, Cal State University, Fullerton, Ca. CFP designation, Lic. # 059125, 9-24-1997 S65, S63, S24, S7 and CA Insurance Lic # 0C34346</p> <p>Business background</p> <p>Current affiliation with SagePoint Financial, Inc., as Registered Principal and OSJ-Branch Office Manager.</p>

Complete amended pages in full, circle amended items and file with execution page (page 1).

**Schedule F of  
Form ADV**

**Continuation Sheet for Form ADV Part II**

Applicant:	SEC File Number:	Date:
<b>Ronald Joseph Wagner</b>	<b>801-63145</b>	<b>03-30-2010</b>

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: <b>Wagner, Ronald Joseph</b>	IRS Empl. Ident. No.: <b>127-34-4147</b>
Item of Form (identify)	Answer
	<p>Investment Adviser Representative with Ronald Joseph Wagner</p> <p>Customer Service Representative (Bank of America) Served as liaison to customers and branch financial services officers. Work to resolve issues on various loan products.</p> <p>Operations (Bank of America) New account processing Accounting Audit Resolve customer complaints</p> <p><b>Gerald G. Guintu was born October 26, 1968.</b></p> <p><u>Education and Business background</u></p> <p>Education:</p> <p>H.S. Diploma 1986, College Park High School, Pleasant Hill, Ca. AA 1990, Diablo Valley College, Pleasant Hill, Ca. BS Business Marketing 1992, Cal State University, Hayward, Ca. S66, S63, S7, S6 and CA Insurance Lic # 0D86935</p> <p>Business background</p> <p>Current affiliation with SagePoint Financial, Inc., as Registered Representative. Investment Adviser Representative with Ronald Joseph Wagner Chief Compliance Officer</p> <p>Sole Proprietor of Karate Ways, Pleasant Hill, CA. Owner, instructor and responsible for general operations (marketing, accounting, seminars, etc) 1992 - 2006</p> <p><b>Mark C. Loftin was born September 19, 1970.</b></p> <p><u>Education and Business background</u></p> <p>Education:</p> <p>H.S. Diploma 1989, Northgate High School, Walnut Creek, CA BS Business – Finance 1994, Cal State University, Sacramento CA S63, S7, and Chartered Financial Analyst Charter #81121 (2005)</p> <p>Business background</p> <p>Current affiliation with SagePoint Financial, Inc., as Registered Assistant to Steve Loftin.</p>

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**Schedule F of  
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**Continuation Sheet for Form ADV Part II**

Applicant:	SEC File Number:	Date:
<b>Ronald Joseph Wagner</b>	<b>801-63145</b>	<b>03-30-2010</b>

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

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Item of Form (identify)	Answer	
	<p>Investment Adviser Representative with Ronald Joseph Wagner</p> <p>CDO Analyst (SCM Advisors LLC, San Francisco) – 2006-2007 Analyzed new deals and performed surveillance on existing Collateralized Debt and Collateralized Loan deals. Assisted with generating and fine-tuning Excel surveillance models. Participated in conference calls with CDO/CLO portfolio managers.</p> <p>Trading Operation Manager (SCM Advisors LLC, San Francisco) – 2002-2006 Communicated with Trading, Compliance, Accounting, Administration and external brokers and custodian banks to resolve stock and bond trade issues. Reported to Senior Management. Trained new employees. Wrote procedure manuals for Operations Dept.</p> <p>Senior Associate, International Trading Operations (Montgomery Asset Management LLC, San Francisco) – 1997-2000 Utilized various software applications and communicated with International Trading, Reconciliation, Compliance and Administration to resolve trade settlement and system processing issues. Trained new employees.</p> <p>Operations Specialist, Institutional Trading (Montgomery Securities – now Bank of America San Francisco) – 1995-1997 Worked with prime brokers, custodian banks and internal brokers to resolve trade clearing and security segregation issues. Wrote procedure manuals for DTC clearing desk.</p>	
7. A.B.C.	<p>Adviser's associated persons are licensed as insurance agents and securities salespersons, and in the business of selling insurance and securities products. Adviser is principally in the Investment Management and Asset allocation services business.</p> <p>As disclosed elsewhere in this Form ADV, that Adviser's associated persons are registered representatives, affiliated with a NASD broker/dealer, an independent insurance agent. While these are all related activities, they are separated in this fashion in order to be in compliance with investment advisor regulations.</p>	
8.C.1	<p>Adviser's associated persons are associated with SagePoint Financial, Inc. as registered representatives SagePoint Financial, Inc. is a diversified financial services company engaged in the sale of specialized investment products. Adviser and its associated persons may recommend securities or insurance products offered by SagePoint Financial, Inc. If Adviser's client purchases these products through us, Adviser and/or its associated persons will receive the normal commissions. Thus a conflict exists between my interest and those of our advisory clients. The client is under no obligation to purchase products we recommend, or to purchase products either through us or through SagePoint Financial, Inc. unless done in conjunction with an investment management program(s).</p> <p><b>PAYING AGENT DISCLOSURE</b> As disclosed in this Schedule F, Ronald J. Wagner, Steve Loftin, Jill Guintu and Gerald Guintu</p>	

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**Schedule F of  
Form ADV**

**Continuation Sheet for Form ADV Part II**

Applicant:	SEC File Number:	Date:
<b>Ronald Joseph Wagner</b>	<b>801-63145</b>	<b>03-30-2010</b>

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: <b>Wagner, Ronald Joseph</b>		IRS Empl. Ident. No.: <b>127-34-4147</b>
Item of Form (identify)	Answer	
	<p>are registered securities representatives of SagePoint Financial, Inc., a broker dealer and member of the National Association of Securities Dealers, Inc. ("NASD"). Under the rules and regulations of the NASD, SagePoint Financial, Inc. has obligations to maintain records and perform other functions regarding certain aspects of the investment advisory activities of its registered representatives in relation to certain advisory accounts for which its registered representatives provide investment advice. These obligations require SagePoint Financial, Inc. to coordinate with, and have the cooperation of, account custodians.</p> <p>In order to fulfill its obligation, SagePoint Financial, Inc. has established a list of custodian and brokerage firms which it has arranged to obtain the required cooperation, and which therefore may be utilized for custody of accounts directly advised either by registered representatives of SagePoint Financial, Inc. who are investment advisers or other investment adviser entities which are affiliated with registered representatives of SagePoint Financial, Inc. In certain instances, SagePoint Financial, Inc. will collect, as paying agent for <b>Adviser</b>, the investment advisory fee remitted to <b>Adviser</b> by the account custodian, and SagePoint Financial, Inc. will retain a portion as a charge to the Investment Adviser (not the client) for the functions SagePoint Financial, Inc. is required to carry out by the NASD. This fee will not increase execution or brokerage charges to the client of the fee the client has agreed to pay <b>Adviser</b> pursuant to the client's advisory agreement. A portion of the fee retained by SagePoint Financial, Inc. may be re-allowed to other registered representatives of SagePoint Financial, Inc. who, as registered representatives of SagePoint Financial, Inc., are responsible for the supervision of other representatives and assist SagePoint Financial, Inc. with the functions described above.</p> <p>Representatives and principals of <b>Adviser</b> may be associated persons of SPF, a registered full service general securities broker-dealer with the Securities and Exchange Commission ("SEC"), a registered investment adviser, a member of the National Association of Securities Dealers, Inc. ("NASD") and various other regulatory bodies. SPF may provide brokerage services to one or more of the third-party advisers to whom <b>Adviser</b> refers customers, in which capacity SPF may receive brokerage fees for transaction completed on behalf of customers of <b>Adviser</b>, a portion of which may be paid to customer's representative.</p> <p>For brokerage programs provided by SPF, it furnishes certain materials and forms for the programs, including account agreement forms to be used by representatives of SPF when opening customer accounts. SPF reviews and, if applicable, approves the material solely in its capacity as broker-dealer for the account.</p> <p>SPF may also act as paying agent with respect to payments made by third-party advisers to <b>Adviser</b> under solicitor's agreements between them. SPF does not act as an investment adviser with respect to any accounts which are referred directly by <b>Adviser</b> to third party advisers. <b>THE CUSTOMER DOES NOT HAVE AN INVESTMENT ADVISER RELATIONSHIP WITH SPF UNLESS THE CUSTOMER HAS SIGNED A DIRECT ADVISORY CONTRACT WITH SPF, AND THEN ONLY IN RELATION TO THE ASSETS SUBJECT TO THAT CONTRACT.</b></p> <p>An affiliate of SPF, SunAmerica Asset Management Corp. ("SAMC"), is a participating manager in certain wrap fee programs which may be offered by certain third-party managers to whom <b>Adviser</b> may refer customers. Those customers utilizing the services of SAMC should carefully review the conflicts of interest disclosed in that manager's Form ADV Part II or equivalent disclosure document. SAMC also provides individual management and administrative services</p>	

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**Schedule F of  
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**Continuation Sheet for Form ADV Part II**

Applicant:	SEC File Number:	Date:
<b>Ronald Joseph Wagner</b>	<b>801-63145</b>	<b>03-30-2010</b>

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: <b>Wagner, Ronald Joseph</b>		IRS Empl. Ident. No.: <b>127-34-4147</b>
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	<p>to certain investment companies for a fee pursuant to a contract. Various broker-dealers, including SPF sell shares in these investment companies as publicly registered mutual funds. These shares may be purchased in advisory accounts solicited by <b>Adviser</b>, and may also be purchased otherwise by customers with non-advisory account assets.</p> <p>SPF is an indirect subsidiary of American International Group, Inc. ("AIG"), a public corporation listed on the New York Stock Exchange. AIG owns three life insurance companies, SunAmerica Life Insurance Company, Anchor National Life Insurance Company and First SunAmerica Life Insurance Company. The life insurance companies specialize in selling tax-deferred, long-term savings products, primarily fixed and variable annuities. The life insurance companies also charge certain fees in association with their products, such as: mortality and expense, administrative fees and management fees. These variable annuities may be purchased in advisory accounts solicited by <b>Adviser</b>, but only on a non-discretionary basis after the customer has received a prospectus disclosing all terms of the annuities. In addition, variable annuities may be purchased by customers of <b>Adviser</b> with non-advisory account assets.</p>	
8. C. 10	Adviser does business with various TPA's for small 401K Pension plans. Adviser also does business with larger turnkey plan administrators like Putnam and other large Mutual fund companies for larger pension and profit sharing plans.	
9. B, D & E	<p><u><b>PARTICIPATION OR INTEREST IN CLIENTS TRANSACTIONS</b></u></p> <p>On occasion, Adviser's Investment Advisory Representatives may buy or sell securities that they recommend to, purchase for, and/or sell on behalf of clients. There is no conflict of interest in that these securities are widely held and publicly traded. Further, Adviser will ensure that in the case of individual securities transactions, Investment Advisory Representatives of Adviser do not receive a better price on the same day they execute a securities transactions in the same security for their personal account(s) and client account(s).</p> <p><u><b>CODE OF ETHICS</b></u></p> <p>As stated above, Adviser's Investment Advisory Representatives may buy or sell securities identical to those recommended to Adviser's customers for their personal accounts. In addition, any related person(s) may have an interest or position in a certain security(ies) which may also be recommended to clients.</p> <p>It is the expressed policy of Adviser that its investment advisory representatives may not purchase or sell any individual stock or bond prior to a transaction(s) being implemented for an advisory account, and therefore, preventing them from benefiting as a result of transactions placed on behalf of advisory accounts.</p> <p>As these situations represent a conflict of interest, Adviser has established the following restrictions in order to ensure its fiduciary responsibilities to clients are met:</p> <p>1) Adviser's investment advisory representatives shall not buy or sell securities for their personal portfolio(s) where the decision is substantially derived, in whole or in part, by their role as an Adviser advisory representative, unless the information is also available to the investing public on reasonable inquiry. In no case, shall</p>	

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**Continuation Sheet for Form ADV Part II**

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(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: <b>Wagner, Ronald Joseph</b>		IRS Empl. Ident. No.: <b>127-34-4147</b>
Item of Form (identify)	Answer	
	<p>Adviser's investment advisory representatives prefer their own interests to that of Adviser's advisory clients. (1) (2)</p> <p>2) Adviser emphasizes the unrestricted right of its clients to decline to implement any advice rendered.</p> <p>3) Adviser's Investment Advisory Representatives recognize they must act in accordance with all applicable Federal and State regulations governing registered investment advisory practices.</p> <p><b>Footnotes</b></p> <p>(1) This investment policy has been established recognizing that some securities being considered for purchase and sale on behalf of Adviser's Investment Advisory Representatives trade in sufficiently broad markets to permit transactions by clients to be completed without an appreciable impact on the markets of the securities. Under certain circumstances, exceptions may be made to the policies stated above. Records of these trades, including the reasons for the exceptions, will be maintained with Adviser's records in the manner set forth above.</p> <p>(2) Open-end mutual funds and/or the investment sub-accounts which may comprise a variable insurance product are purchased or redeemed at a fixed net asset value price per share specific to the date of purchase of redemption. As such, transactions in mutual funds and/or variable insurance products by Adviser's Investment Advisory Representatives are not likely to have an impact on the prices of the fund shares in which clients invest, and are therefore not prohibited by Adviser's Investment policies and procedures.</p> <p>A complete copy of Adviser's Code of Ethics is available upon request.</p>	
10.	Guidelines set by <b>VISION2020</b> Advisor and Premier Programs.	
12.A.1	The advisory agreement provides the advisor with limited trading discretion.	
12.A.2	Once a general investment strategy has been approved by the client, the advisor may make manager and asset allocation changes to the portfolio without first seeking the approval of client.	

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