

## **Item 1 – Cover Page**

### **MASCAGNI WEALTH MANAGEMENT**

**205 E. Main Street  
Clinton, MS 39056**

**601-925-8099**

**[www.mascagniwealth.com](http://www.mascagniwealth.com)**

**March 31, 2011**

This Brochure provides information about the qualifications and business practices of MASCAGNI WEALTH MANAGEMENT. If you have any questions about the contents of this Brochure, please contact us at 601-925-8099 and/or [randy@mascagni.com](mailto:randy@mascagni.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.

MASCAGNI WEALTH MANAGEMENT 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 MASCAGNI WEALTH MANAGEMENT also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Item 2 – Material Changes**

On July 28, 2010, the United State Securities and Exchange Commission published “Amendments to Form ADV” which amends the disclosure document that we provide to clients as required by SEC Rules. This Brochure dated March 31, 2011 is a new document prepared according to the SEC's new requirements and rules. As such, this Document is materially different in structure and requires certain new information that our previous brochure did not require.

In the future, this Item will discuss only specific material changes that are made to the Brochure and provide clients with a summary of such changes. We will also reference the date of our last annual update of our brochure.

In the past we have offered or delivered information about our qualifications and business practices to clients on at least an annual basis. Pursuant to new SEC Rules, we will ensure that you receive a summary of any materials changes to this and subsequent Brochures within 120 days of the close of

our business' fiscal year. We may further provide other ongoing disclosure information about material changes as necessary.

We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, our Brochure may be requested by contacting Julie Sanders, Vice President of Client Administrative Services at 601-925-8099 or [julie@mascagni.com](mailto:julie@mascagni.com).

Additional information about MASCAGNI WEALTH MANAGEMENT is also available via the SEC's web site [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC's web site also provides information about any persons affiliated with MASCAGNI WEALTH MANAGEMENT who are registered, or are required to be registered, as investment adviser representatives of MASCAGNI WEALTH MANAGEMENT.

### Item 3 -Table of Contents

Item 1 – Cover Page.....	i
Item 2 – Material Changes.....	i
Item 3 -Table of Contents.....	iii
Item 4 – Advisory Business .....	1
Item 5 – Fees and Compensation .....	1
Item 6 – Performance-Based Fees and Side-By-Side Management .....	1
Item 7 – Types of Clients .....	1
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss .....	2
Item 9 – Disciplinary Information .....	2
Item 10 – Other Financial Industry Activities and Affiliations .....	2
Item 11 – Code of Ethics .....	2
Item 12 – Brokerage Practices .....	3
Item 13 – Review of Accounts .....	4
Item 14 – Client Referrals and Other Compensation .....	4
Item 15 – Custody.....	4
Item 16 – Investment Discretion.....	4
Item 17 – Voting Client Securities .....	4
Item 18 – Financial Information.....	4

Brochure Supplement(s)

#### **Item 4 – Advisory Business**

---

MASCAGNI WEALTH MANAGEMENT provides comprehensive financial planning services for its client. The firm has been in business since 1990 with J. Randall Mascagni as primary owner and Principal.

#### **Item 5 – Fees and Compensation**

---

The percentages stated are estimates.

Client fees are based on an estimate of the planning time required and are quoted prior to engaging services, minimum 1 hour of service. Hourly rates are as follows: \$90/hour for planner time (\$125/hour for corporate-business planner time); \$65/hour for paraplanner time (\$75/hour for corporate-business paraplanner time). Fees are collected on a monthly basis as incurred. However, an initial retainer fee, approximately 40% of the first year estimate, maximum \$500, (which is credited towards final total fees) is collected at the fact-finding session after signing fee agreement. All fees are fully refundable during the first five days. Thereafter fees are refundable based on the semi-annual fee over \$200 on a pro-rata basis to work performed.

The following fees apply for Financial Advisory Services beginning the second year (beginning the first business days after the end of previous year of service or alternative date agreed upon by the client); not to exceed both \$500 and 6-months in advance of service based on client's total investment assets, not to include residence, personal property and personally owned real estate.

Under \$30,000	Quote (minimum of \$125)
\$30,000 - \$49,999	\$450
The first \$250,000	0.75 percent (minimum of \$500)
The next \$500,000	0.50 percent
The next \$2,500,000	0.25 percent
Balance over \$2,500,000	0.15 percent

The above stated fees are negotiable prior to engagement. Advisory fees are calculated on a per volume category basis. The term of this agreement is for 12-months beginning the date of the clients signing of the Fee Agreement or an alternative date agreed upon by the client.

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

---

MASCAGNI WEALTH MANAGEMENT does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

#### **Item 7 – Types of Clients**

---

MASCAGNI WEALTH MANAGEMENT provides portfolio management services to individuals, high net worth individuals, corporate pension and profit-sharing plans, trusts, estates, and or charitable organizations.

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

---

MASCAGNI WEALTH MANAGEMENT's security analysis methods include charting and fundamental analysis. The main sources of information the firm uses are financial newspapers and magazines, research materials prepared by others, corporate rating services and annual reports, prospectuses, and/or filings with the SEC. The investment strategies used to implement any investment advice given to clients include long-term purchases and short-term purchases. Investing in securities involves risk of loss that clients should be prepared to bear.

## **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 MASCAGNI WEALTH MANAGEMENT or the integrity of MASCAGNI WEALTH MANAGEMENT's practice. MASCAGNI WEALTH MANAGEMENT has no information applicable to this item.

## **Item 10 – Other Financial Industry Activities and Affiliations**

---

Individuals associated with MASCAGNI WEALTH MANAGEMENT may be registered representatives who are securities licensed through Investacorp, Inc., a registered broker/dealer, member of FINRA, SIPC. As such, if a client elects to implement securities transactions through these individuals, a commission will be paid by the client to these individuals and a conflict of interest does exist.

Individuals associated with the applicant may also be insurance licensed to offer fixed insurance products through various insurance companies. Clients are again not obligated to execute insurance purchases through these individuals. However, if clients do choose to execute insurance purchases through these individuals, the clients will pay a commission and a conflict of interest may exist.

## **Item 11 – Code of Ethics**

---

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

MASCAGNI WEALTH MANAGEMENT anticipates that, in appropriate circumstances, consistent with clients' investment objectives, it will cause accounts over which Mascagni Wealth Management has management authority to effect, and will recommend to investment advisory clients or prospective

clients, the purchase or sale of securities in which MASCAGNI WEALTH MANAGEMENT, its affiliates and/or clients, directly or indirectly, have a position of interest. MASCAGNI WEALTH MANAGEMENT's employees and persons associated with MASCAGNI WEALTH MANAGEMENT are required to follow MASCAGNI WEALTH MANAGEMENT's Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors and employees of MASCAGNI WEALTH MANAGEMENT and its affiliates may trade for their own accounts in securities which are recommended to and/or purchased for MASCAGNI WEALTH MANAGEMENT's clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of MASCAGNI WEALTH MANAGEMENT will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code certain classes of securities have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of MASCAGNI WEALTH MANAGEMENT's clients. In addition, the Code requires pre-clearance of many transactions, and restricts trading in close proximity to client trading activity. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics, and to reasonably prevent conflicts of interest between MASCAGNI WEALTH MANAGEMENT and its clients.

MASCAGNI WEALTH MANAGEMENT's clients or prospective clients may request a copy of the firm's Code of Ethics by contacting J. Randall Mascagni ([randy@mascagni.com](mailto:randy@mascagni.com)) or Julie Sanders ([julie@mascagni.com](mailto:julie@mascagni.com)) or any officer of the firm.

## **Item 12 – Brokerage Practices**

---

MASCAGNI WEALTH MANAGEMENT has one or more individuals who are securities licensed through Investacorp, Inc., a registered broker/dealer, member FINRA, SIPC. MASCAGNI WEALTH MANAGEMENT has one or more associates that are advisory licensed through Investacorp Advisory Services, Inc., a SEC registered investment advisory firm.

The firm implements all brokerage transactions through Investacorp, Inc. and/or Investacorp Advisory Services, Inc. as directed by clients.

MASCAGNI WEALTH MANAGEMENT does not have authority to determine, , without obtaining specific client consent, securities to be bought or sold, amount of securities to be bought or sold, broker or dealer to be used, and/or commission rates paid.

MASCAGNI WEALTH MANAGEMENT utilizes the following wrap fee programs available through its affiliation with Investacorp Advisory Services, Inc.: Choice, Choice+, Structure, Structure+, Architect, LAMP, and DANA. MASCAGNI WEALTH MANAGEMENT also utilizes certain TPA (third party administrator) and Trustee services in conjunction with qualified retirement plan services.

### **Item 13 – Review of Accounts**

---

MASCAGNI WEALTH MANAGEMENT will review accounts on a quarterly, semi-annual, or annual basis depending on the client's needs. Any necessary changes shall be made only at the client's election.

At the end of each client's fiscal year, an investment update is conducted to provide clients with a report relative to their accounts. In-person meetings are encouraged for this annual review.

### **Item 14 – Client Referrals and Other Compensation**

---

MASCAGNI WEALTH MANAGEMENT does not receive other compensation based on client referrals and/or other advisory services engaged by clients that could involve a conflict of interest.

### **Item 15 – Custody**

---

Clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. MASCAGNI WEALTH MANAGEMENT urges you to carefully review such statements and compare such official custodial records to the account statements that we may provide to you. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

### **Item 16 – Investment Discretion**

---

MASCAGNI WEALTH MANAGEMENT does not accept discretionary authority to manage securities accounts on behalf of clients.

### **Item 17 – Voting Client Securities**

---

As a matter of firm policy and practice, MASCAGNI WEALTH MANAGEMENT does not have any authority to and does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. MASCAGNI WEALTH MANAGEMENT may provide advice to clients regarding the clients' voting of proxies.

### **Item 18 – Financial Information**

---

MASCAGNI WEALTH MANAGEMENT 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.