



## **Form ADV Part 2A: Firm Brochure**

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**February 1, 2015**

*This brochure provides information about the qualifications and business practices of Wealth Analytics Partners, LLC. If you have any questions about the contents of this brochure, please contact us at: 858-794-2100, or by email at: [Gordon@wealthanalytics.com](mailto:Gordon@wealthanalytics.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission, or by any state securities authority.*

*Additional information about the Adviser is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*

## ITEM 2- MATERIAL CHANGES SINCE THE LAST UPDATE

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The Material Changes section of this brochure will be updated annually when material changes occur since the previous release of the Firm Brochure. Wealth Analytics Partners, LLC does not currently have any material changes to disclose since the last update in 2013.

## FULL BROCHURE AVAILABLE

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Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: 858-794-2100 or by email at: [Gordon@wealthanalytics.com](mailto:Gordon@wealthanalytics.com).

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## ITEM 4-ADVISORY BUSINESS

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### **FIRM DESCRIPTION**

Wealth Analytics Partners, LLC, hereinafter ("the Adviser") was founded in 2004 and is an SEC registered investment adviser.

The Adviser is a fee-only investment management and financial planning firm. The firm does not sell securities on a commission basis. It should also be noted that the Adviser does not act as a custodian of client assets and the client always maintains asset control.

As a registered investment adviser we are held to a fiduciary standard. We have the duty always to put our clients' interests before our own, by providing disinterested advice and disclosing any material conflicts of interest to our clients as disclosed herein.

### **PRINCIPAL OWNERS**

Wealth Analytics, Inc and Strategic Asset Management Group, LLC are each 50% owners of Wealth Analytics Partners, LLC. Troy Daum owns 100% of Wealth Analytics, Inc. and Gordon Tudor owns 100% of Strategic Asset Management Group, LLC.

### **MANAGED ASSETS**

As of September 12, 2014, the Adviser manages approximately \$154,419,056 in asset for approximately 282 accounts. The Adviser manages \$122,046,397 on a discretionary basis and \$32,372,658 on non-discretionary basis.

### **INVESTMENT MANAGEMENT AGREEMENT**

As part of the investment management service, advisory personnel review many aspects of the client's financial affairs. Advisory personnel then work with clients to set realistic and measurable goals and to define objectives to reach those goals. As goals and objectives change over time, advisory personnel make recommendations and implement an action plan on an ongoing basis. The Adviser periodically reviews a client's financial situation and portfolio through regular contact with the client which often includes an annual meeting with the client. The Adviser makes use of portfolio rebalancing to maintain client allocations.

The scope of work and fee for an Advisory Service Agreement is provided to the client in writing prior to the start of the relationship. The agreement sets forth the services to be provided and the fees for the service. The agreement may be terminated by either party in writing at any time.

### **FINANCIAL PLANNING AGREEMENT**

The financial plan may include, but is not limited to: a net worth statement; a cash flow statement; a review of investment accounts, including reviewing asset allocation and providing repositioning recommendations; strategic tax planning; a review of retirement accounts and plans including

recommendations; and recommendations for changes, if necessary; one or more retirement scenarios; estate planning review and recommendations; and education planning with funding recommendations. However, the client is under no obligation to accept any of the recommendations of the Adviser or use the services of the Adviser in particular.

#### **HOURLY ENGAGEMENTS**

The Adviser provides hourly services for clients who need advice on a limited scope of work.

#### **ASSET MANAGEMENT**

Investments may include: equities (stocks), corporate debt securities, commercial paper, certificates of deposit, municipal securities, investment company securities (mutual funds shares), U. S. government securities, options contracts, and interests in partnerships.

#### **WRAP PROGRAM**

The Adviser does not sponsor or provide investment management services to a wrap program.

#### **TERMINATION OF AGREEMENT**

The Adviser reserves the right to terminate any financial planning engagement where a client has willfully concealed or has refused to provide pertinent information about financial situations when necessary and appropriate, in the Adviser's judgment, to providing proper financial advice. Any unused portion of fees collected in advance will be refunded.

A Client may terminate any agreement at any time by notifying the Adviser in writing. Clients shall be charged pro rata for services provided through to the date of termination. If the client made an advance payment, the Adviser will refund any unearned portion of the advance payment.

Upon termination, Clients will receive a refund of any unearned fees. An Advisory client will have a period of five (5) business days from the date of signing the investment advisory agreement to unconditionally rescind the agreement and receive a full refund of all fees. Thereafter, the client may terminate the investment advisory agreement by providing the Adviser with thirty (30) days written notice. Upon termination, fees will be prorated to the date of termination and any unearned portion will be refunded to the Client.

If the Agreement is terminated prior to the end of the quarter, fees will be prorated for services performed. If the Client is an individual person, the Agreement shall terminate upon receipt by the Adviser of written notice of the death or mental disability of the Client. Termination of the Agreement shall not, in any case, affect or preclude the consummation of any prior transaction.

#### **ASSIGNMENT OF INVESTMENT MANAGEMENT AGREEMENTS**

Agreements may not be assigned without client consent.

## ITEM-5 FEES/SERVICES AND COMPENSATION

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### INVESTMENT MANAGEMENT

The Adviser provides investment supervisory services, also known as asset management services and furnishes investment advice through consultations. On more than an occasional basis, the Adviser furnishes advice to clients on matters not involving securities.

The Adviser bases its fees on a percentage of assets under management, hourly charges, and fixed fees (not including subscription fees).

Wealth Analytics Partners, LLC (“the Adviser”) charges fees for financial planning and investment advice. Fees are charged quarterly in advance based on the total market value of the account including cash, as of the last trading day of the preceding calendar quarter. Fees for asset management services are negotiable and generally range from .50% to 1.25% per year of the assets under management. Fees are typically based on the amount of assets under management and the range of services being provided. In some cases, clients with the similar services may be subject to different fee schedules. In addition, fees may be adjusted upon thirty days’ written notice to the client.

### HOURLY ENGAGEMENTS AND FINANCIAL PLANNING

The hourly fee is up to \$250 and is paid after the consultations. Fixed fees refer to written financial plans, which range from \$500.00 to \$50,000, depending on the nature and complexity of a client’s financial situation. Half the fee is due up front, the rest upon presentation of the plan. If a client cancels, any prepaid fees will be refunded on a pro-rated basis and/or the Adviser may deduct fees based upon the amount of time spent at a rate of \$250 per hour.

When multiple services are offered, there is a conflict of interest since there is an incentive for the party offering financial planning services to recommend products or services for which the Adviser, or a related party, may receive compensation. However, financial planning clients are under no obligation to act upon any recommendations of the Adviser or to effect any transactions through the Adviser if they decide to follow the recommendations.

### THIRD-PARTY MANAGERS

The Adviser may select and monitor other money managers. These third-party money managers pay the Adviser a portion of the fees generated by the referred client; clients do not directly pay for this service. It should be noted that clients may be able to obtain similar services elsewhere for less cost and may cancel at any time.

## ITEM 6- PERFORMANCE BASED FEES

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Fees are not based on a share of the capital gains or capital appreciation of managed securities. The Adviser does not use a performance-based fee structure.

## ITEM 7-TYPES OF CLIENTS

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The Adviser generally provides investment advice to individuals, institutions, pension and profit sharing plans, trusts, estates, or charitable organizations, corporations or business entities.

### ACCOUNT MINIMUMS

The Adviser requires a minimum of \$1,000,000 to establish a new advisory account; however, the minimum may be waived at the sole discretion of the Adviser. In addition, the Adviser may continue to service existing clients that have values that are below the minimum.

## ITEM 8-METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

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### METHODS OF ANALYSIS

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The Adviser's security analysis methods include fundamental analysis.

The main sources of information include financial newspapers and magazines, research materials prepared by others, corporate rating services, annual reports, prospectuses, filings with the Securities and Exchange Commission, and company press releases.

### INVESTMENT STRATEGIES

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Strategies may include long-term purchases, short-term purchases and margin transactions. Portfolios are generally globally diversified to control the risk associated with traditional markets.

### MARKET, SECURITY AND REGULATORY RISKS

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Any investment with the Adviser or any other Adviser involves significant risk, including a complete loss of capital and conflicts of interest. All investment programs have certain general risks that are borne by the investor which are described below:

#### MARKET RISKS:

**Competition.** The securities industry and the varied strategies and techniques to be engaged in by the Adviser are extremely competitive and each involves a degree of risk. The Adviser will compete with firms, including many of the larger securities and investment banking firms, which have substantially greater financial resources and research staffs.

**Market Volatility.** The profitability of the Adviser substantially depends upon it correctly assessing the future price movements of stocks, bonds, options on stocks, and other securities and the movements of interest rates. The Adviser cannot guarantee that it will be successful in accurately predicting price and interest rate movements.

**Wealth Analytics Partners LLC's Investment Activities.** The Adviser's investment activities involve a significant degree of risk. The performance of any investment is subject to numerous factors which are neither within the control of nor predictable by the Adviser. Such factors include a wide range of economic, political, competitive, technological and other conditions (including acts of terrorism and war) that may affect investments in general or specific industries or companies. The securities markets may be volatile, which may adversely affect the ability of the Adviser to realize profits. Additionally, specific investments under the Adviser's strategy may require significant time to realize the expected return and may experience a pricing correction in a faster-than-expected time, subjecting the Adviser to reinvestment risk. Likewise, the investment strategy of the Adviser is partially dependent on its ability to correctly identify and assess technology's impact on a company's business. As a result of the nature of the Adviser's investing activities, it is possible that its financial performance may fluctuate substantially over time and from period to period.

**Material Non-Public Information.** By reason of their responsibilities in connection with other activities of the Adviser and/or its affiliates, certain principals or employees of the Adviser and/or its affiliates may acquire confidential or material non-public information or be restricted from initiating transactions in certain securities. The Adviser will not be free to act upon any such information. Due to these restrictions, the Adviser may not be able to initiate a transaction that it otherwise might have initiated and may not be able to sell an investment that it otherwise might have sold.

**Accuracy of Public Information.** The Adviser selects investments, in part, on the basis of information and data filed by issuers with various government regulators or made directly available to the Adviser by the issuers or through sources other than the issuers. Although the Adviser evaluates all such information and data and sometimes seeks independent corroboration when it's considered appropriate and reasonably available, the Adviser is not in a position to confirm the completeness, genuineness or accuracy of such information and data, and in some cases, complete and accurate information is not available. Investments may not perform as expected if information is inaccurate.

**Small Companies.** The Adviser may invest a portion of its assets in small and/or unseasoned companies with small market capitalization. While smaller companies generally have potential for rapid growth, they often involve higher risks because they may lack the management experience, financial resources, product diversification and competitive strength of larger companies. In addition, in many instances, the frequency and volume of their trading may be substantially less than is typical of larger companies. As a result, the securities of smaller companies may be subject to wider price fluctuations. When making large sales, the Adviser may have to sell portfolio holdings at discounts from quoted prices or may have to make a series of small sales over an extended period of time due to the lower trading volume of smaller company securities.

**Volatility of Currency Prices.** The profitability of the Adviser's portfolios depends, in part, upon the Adviser correctly assessing the future price movements of currencies. However, price movements of currencies are difficult to predict accurately because they are influenced by, among other things, changing supply and demand relationships; governmental, trade, fiscal, monetary and exchange control programs and policies; national and international political and economic events; and changes in interest rates. Governments from time to time intervene in certain markets in order



to influence prices directly. The Adviser cannot guarantee that it will be successful in accurately predicting currency price and interest rate movements.

**Market or Interest Rate Risk.** The price of most fixed income securities move in the opposite direction of the change in interest rates. For example, as interest rates rise, the price of fixed income securities falls. If the Adviser holds a fixed income security to maturity, the change in its price before maturity may have little impact on the Adviser's performance; however, if the Adviser has to sell the fixed income security before the maturity date, an increase in interest rates could result in a loss to the Adviser.

**Maturity Risk.** In certain situations, the Adviser may purchase a bond of a given maturity as an alternative to another bond of a different maturity. Ordinarily, under these circumstances, the Adviser will make an adjustment to account for the interest rate risk differential in the two bonds. This adjustment, however, makes an assumption about how the interest rates at different maturities will move. To the extent that the yield movements deviate from this assumption, there is a yield-curve or maturity risk. Another situation where yield-curve risk should be considered is in the analysis of bond swap transactions where the potential incremental returns are dependent entirely on the parallel shift assumption for the yield curve.

**Inflation Risk.** Inflation risk results from the variation in the value of cash flows from a security due to inflation, as measured in terms of purchasing power. For example, if the Adviser purchases a 5-year bond in which it can realize a coupon rate of 5%, but the rate of inflation is 6%, then the purchasing power of the cash flow has declined. For all but inflation-linked bonds, adjustable bonds or floating rate bonds, the Adviser is exposed to inflation risk because the interest rate the issuer promises to make is fixed for the life of the security. To the extent that interest rates reflect the expected inflation rate, floating rate bonds have a lower level of inflation risk.

**Risk of Default or Bankruptcy of Third Parties.** The Adviser may engage in transactions in securities, commodities, other financial instruments and other assets that involve counterparties. Under certain conditions, the Adviser could suffer losses if a counterparty to a transaction were to default or if the market for certain securities, commodities, other financial instruments and/or other assets were to become illiquid. In addition, the Adviser could suffer losses if there were a default or bankruptcy by certain other third parties, including brokerage firms and banks with which the Adviser does business, or to which securities, commodities, other financial instruments and/or other assets have been entrusted for custodial purposes. For example, if the Adviser's prime broker and custodian were to become insolvent or file for bankruptcy, the Adviser could suffer significant losses with respect to any securities held by such firm.

#### **REGULATORY RISKS:**

**Strategy Restrictions.** Certain institutions may be restricted from directly utilizing investment strategies of the type in which the Adviser may engage. Such institutions, including entities subject to ERISA, should consult their own advisors, counsel and accountants to determine what restrictions may apply and whether an investment in the Adviser is appropriate.

**Trading Limitations.** For all securities, instruments and/or assets listed on an exchange, including options listed on a public exchange, the exchange generally has the right to suspend or limit trading under certain circumstances. Such suspensions or limits could render certain strategies difficult to

complete or continue and subject the Adviser to loss. Also, such a suspension could render it impossible for the Adviser to liquidate positions and thereby expose the Adviser to potential losses.

**Tax Risk.** The tax aspects of an investment in the Adviser are complicated and each investor should have them reviewed by professional advisers familiar with such investor's personal tax situation and with the tax laws and regulations applicable to the investor and private investment vehicles as applicable.

**Conflicts of Interest:** In the administration of client accounts, portfolios and financial reporting, the Adviser faces inherent conflicts of interest which are described in this brochure. Generally, the Adviser mitigates these conflicts through its Code of Ethics which provides that the client's interest is always held above that of the Firm and its associated persons.

**Supervision of Trading Operations.** The Adviser, with assistance from its brokerage and clearing firms, intends to supervise and monitor trading activity in the portfolio accounts to ensure compliance with firm and client objectives. Despite the Adviser's efforts, however, there is a risk that unauthorized or otherwise inappropriate trading activity may occur in portfolio accounts.

Depending on the nature of the investment management service selected by a client and the securities used to implement the investment strategy, clients will be exposed to risks that are specific to the securities in their particular investment portfolio.

#### **SECURITY SPECIFIC RISKS:**

**Liquidity:** Liquidity is the ability to readily convert an investment into cash. Securities where there is a ready market that is traded through an exchange are generally more liquid. Securities traded over the counter or that do not have a ready market or are thinly traded are less liquid and may face material discounts in price level in a liquidation situation.

**Currency:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.

## **ITEM 9-LEGAL AND DISCIPLINARY**

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The firm and its employees have not been involved in legal or disciplinary events related to past or present investment clients.

## **ITEM 10-OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS**

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### **AFFILIATIONS**

Certain advisory personnel are licensed to sell insurance products. However, it should be noted that none of these individuals will use this license to sell insurance products at this time. Therefore, advisory personnel do not receive commissions related to the sales of insurance products other

than residual commissions from previous transactions unrelated to advisory clients. Neither the Adviser nor its representatives currently sell insurance products in an effort to minimize conflicts of interest.

The Adviser participates in a program called Adviser's Choice. Adviser's Choice is a platform, which allows the Adviser to purchase transaction fee and no transaction fee mutual funds for clients. The Adviser does not bear the transaction costs of the trades.

As previously disclosed in Item 4, Mr. Troy Daum is associated with Wealth Analytics, Inc. and Mr. Gordon Tudor is associated with Strategic Asset Management Group. Each of these organizations is a 50% owner of the Adviser.

Mr. Gordon Tudor is also a licensed real estate broker in the state of California.

## ITEM 11-CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

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### CODE OF ETHICS

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The Adviser has adopted a Code of Ethics for the purpose of instructing its personnel in their ethical obligations and to provide rules for their personal securities transactions. The Adviser and its personnel owe a duty of loyalty, fairness and good faith towards their clients, and the obligation to adhere not only to the specific provisions of the Code but to the general principles that guide the Code.

The Code covers a range of topics that may include: general ethical principles, reporting personal securities trading, exceptions to reporting securities trading, reportable securities, initial public offerings and private placements, reporting ethical violations, distribution of the Code, review and enforcement processes, amendments to Form ADV and supervisory procedures. The Adviser will provide a copy of the Code to any client or prospective client upon request.

### PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS

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On occasion, the Adviser's members and investment adviser representatives may buy or sell securities that they recommend to clients. There is no conflict of interest as the securities are widely held and publicly traded, and the size of the transactions is too small to affect the market. In addition, they always place client interests before their own interests.

### PERSONAL TRADING

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The Chief Compliance Officer of the Adviser is Gordon Tudor. He reviews all employee trades each quarter (except for his own trading activity which is reviewed by another Principal at the Adviser). The personal trading reviews ensure that the personal trading of employees does not affect the markets, and that clients of the firm receive preferential treatment.

## ITEM 12-BROKERAGE PRACTICES

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### BROKERAGE SELECTION AND SOFT DOLLARS

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Clients may specify which broker-dealer to use or the Adviser may make recommendations. Generally, these recommendations are based on the Adviser's perception of the breadth of services offered, and quality of execution. However, the client may pay commissions or fees that are higher or lower than those that may be obtained from elsewhere for similar services.

When the Adviser does suggest brokers or dealers to execute transactions, the Adviser will seek to achieve the best execution possible but this does not require it to solicit competitive bids and does not have an obligation to seek the lowest available commission cost. Adviser is not required to negotiate "execution only" commission rates, thus the client may be deemed to be paying for research and related services (i.e., "soft dollars") provided by the broker which are included in the commission rate. Research and related services furnished by brokers may include, but are not limited to, written information and analyses concerning specific securities, companies or sectors; market, financial and economic studies and forecasts; financial publications; statistical and pricing services, as well as discussions with research personnel, along with hardware, software, data bases and other technical and telecommunication services and equipment utilized in the investment management process. It is the policy and practice of the Adviser to strive for the best price and execution for costs and discounts which are competitive in relation to the value of the transaction and which comply with Section 28(e) of the Securities Exchange Act of 1934, as amended.

Nevertheless, it is understood that the Adviser may pay compensation on a transaction in excess of the amount of compensation that another broker or dealer may charge so long as it is in compliance with Section 28(e), and the Adviser makes no warranty or representation regarding compensation paid on transactions. In negotiating mark-ups or mark-downs, the Adviser will take into account the financial stability and reputation of brokerage firms and the brokerage and research services provided by such brokers, although the client may not, in any particular instance, be the sole direct or indirect beneficiary of the research services provided. The Adviser has no obligation to deal with any broker or group of brokers in executing transactions in portfolio securities.

### TRADE ERRORS

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From time-to time Adviser may make an error in submitting a trade order on your behalf. When this occurs, Adviser may place a correcting trade with the broker-dealer which has custody of your account. If an investment gain results from the correcting trade, the gain will remain in your account unless the same error involved other client account(s) that should have received the gain, it is not permissible for you to retain the gain, or we confer with you and you decide to forego the gain (e.g., due to tax reasons). If a loss occurs greater than \$100, Adviser will pay for the loss. Generally, if related trade errors result in both gains and losses in your account, they may be netted.

## ORDER AGGREGATION

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The nature of the clients and/or trading activity on behalf of client accounts is such that trade aggregation does not garner any client benefit.

## ITEM 13-REVIEW OF ACCOUNTS

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### PERIODIC REVIEWS AND TRIGGERS

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Advisory associates perform reviews of all investment advisory accounts no less than quarterly. Associates take several factors into account when reviewing accounts including consistency with the investment strategy and performance. Changes in an account holder's personal, tax or financial status or macroeconomic and company specific events may also trigger reviews. There is currently no limit on the number of accounts that can be reviewed by an associate.

### REGULAR REPORTS

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The account custodian generates brokerage statements no less than quarterly and send these statements directly to account holders. These reports list the account positions, activity in the account over the covered period, and other related information. The custodian also sends clients confirmations following each brokerage account transaction unless a client elects to not receive confirmations. In addition, the Adviser will supply each client with a quarterly performance report.

Financial plans are reviewed only upon request unless the Adviser is retained to update the plan on a continuous basis.

## ITEM 14-CLIENT REFERRALS AND OTHER COMPENSATION

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### SOLICITATION

The Adviser may employ/engage solicitors to whom it will pay cash or a portion of the fees paid by investors referred to it by those solicitors. These are one time or ongoing arrangements, based on a percentage of the management fee paid by the client, and do not result in an additional charge to advisory clients. The Adviser and its solicitors comply with the requirements of the Cash Solicitation Rule, Rule 206(4)-3 under the Investment Advisers Act of 1940 and the requirements of the jurisdiction where they operate. When applicable the solicitor will be licensed as investment advisers or notice filed in the applicable jurisdiction.

In addition, the Adviser may act as a solicitor on behalf of various independent registered investment advisers. Based on a client's individual circumstances and needs, the Adviser will assist the client in determining which independent adviser's portfolio management services are

appropriate for that client. Factors considered in making this determination, including account size, risk tolerance, and a client's investment experience, are discussed during a consultation between the Adviser and the client.

Contractually, the independent adviser will pay the Adviser based on a percentage of the client's managed assets depending on the size of the account. This payment is included in the independent investment adviser's annual management fee and does not result in additional charges to advisory clients.

The Adviser will provide clients with a copy of the Form ADV Part 2 of each independent investment adviser to whom it refers clients. The management fee is disclosed in the independent investment adviser's disclosure document (Part 2A of Form ADV or other disclosure document in lieu of Part 2A).

#### **OTHER COMPENSATION**

Other than the previously described products and services that the Adviser receives from broker-dealers (Item 12), the Adviser does not receive any other economic benefits from non-clients in connection with the provision of investment advice to clients.

### **ITEM 15-CUSTODY**

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The Adviser does not accept or permit the Firm or its associated persons from obtaining custody of client assets including cash, securities, acting as trustee, provide bill paying service, have password access to control account activity or any other form of controlling client assets. An independent custodian has custody of client assets, as previously disclosed in Item 12.

The Adviser may directly debit advisory fees from client accounts. As part of this billing process, the client's custodian is advised of the amount of the fee to be deducted from that client's account. On at least a quarterly basis, the custodian is required to send to the client a statement showing all transactions within the account during the reporting period. Because the custodian does not calculate the amount of the fee to be deducted, it is important for clients to carefully review their custodial statements to verify the accuracy of the calculation, among other issues. Clients should contact the Adviser directly if they believe that there may be an error in their statement.

In addition to the periodic statements that clients receive directly from their custodians, the Adviser also sends performance reports directly to clients on a quarterly basis. The Adviser urges clients to carefully compare the information provided on these reports to the information found on the statements sent by the independent custodian to ensure that all account transactions, holdings and values are correct and current.

## ITEM 16-INVESTMENT DISCRETION

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The Adviser generally will have discretion over the selection and amount of securities to be bought or sold without obtaining specific client consent. Discretionary authority is granted by the Adviser's investment management agreement. From time to time the firm's discretionary authority regarding investments may be subject to certain limitations. Any/all such limitations shall be outlined in the investment management agreement.

The Adviser will consult with the client where discretion is not obtained prior to each trade in order to obtain client approval for the transaction(s).

## ITEM 17-VOTING CLIENT SECURITIES

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The Adviser will not vote nor advise clients how to vote proxies for securities held in client accounts. The client clearly keeps the authority and responsibility for the voting of these proxies. The Adviser does not give any advice or take any action with respect to the voting of these proxies. For accounts subject to the provisions of the Employee Retirement Income Security Act of 1974 ("ERISA"), the plan fiduciary specifically keeps the authority and responsibility for the voting of any proxies for securities held in plan accounts. Clients should receive proxies and other solicitations directly from the custodian (or a service provider contracted by the custodian).

## ITEM 18-FINANCIAL INFORMATION

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The Adviser does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients. The Adviser meets all net capital requirements that it is subject to and the Adviser has never been the subject of a bankruptcy petition.

The Adviser is not required to provide a balance sheet as it does not serve as a custodian for client funds or securities, and does not require prepayment of fees of more than \$1,200 per client, and six months or more in advance without rendering services.

## INFORMATION SECURITY PROGRAM

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### INFORMATION SECURITY

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The Adviser maintains an information security program to reduce the risk that your personal and confidential information may be breached.

### PRIVACY PRACTICES

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#### PRIVACY POLICY

Below is a summary of the Adviser's Privacy Policy regarding client personal information. A complete version of the Privacy Policy is contained in your client advisory agreement and may be obtained by contacting the Compliance Officer of the Adviser.

#### **The Adviser:**

- May collect non-public personal information about its clients from the following sources:
  - Information received from clients on applications or other forms;
  - Information about clients' transactions with the Adviser, its affiliates and others;
  - Information received from our correspondent clearing broker with respect to client accounts; and
  - Information received from service bureaus or other third parties.
- Will not share such information with any affiliated or nonaffiliated third party except:
  - When necessary to complete a transaction in a customer account, such as with the clearing firm or account custodians;
  - When required to maintain or service a customer account;
  - To resolve customer disputes or inquiries;
  - With persons acting in a fiduciary or representative capacity on behalf of the customer;
  - With rating agencies, persons assessing compliance with industry standards, or to the attorneys, accountants and auditors of the firm
- Restricts access to confidential client information to individuals who are authorized to have access to confidential client information and need to know that information to provide services to clients.
- Maintains physical, electronic and procedural security measures that comply with applicable state and federal regulations to safeguard confidential client information.



## FORM ADV PART 2B: BROCHURE SUPPLEMENT

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### **Wealth Analytics Partners, LLC.**

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**February 1, 2015**

*This brochure provides information about principals and adviser representatives of Wealth Analytics Partners, LLC and this brochure supplements the Wealth Analytics Partners, LLC brochure. You should have received a copy of that brochure. Please contact Gordon Tudor at 858-794-2100, or by email at:*

*Gordon@wealthanalytics.com if you did not receive Wealth Analytics Partners, LLC brochure or if you have any questions about the contents of this supplement. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission, or by any state securities authority.*

*Additional information about principals and adviser representatives of Wealth Analytics Partners, LLC is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*

## EDUCATION AND BUSINESS STANDARDS

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Wealth Analytics Partners, LLC requires that advisors have a bachelor's degree and/or further coursework demonstrating knowledge of financial planning and tax planning. Additionally, advisors must have work experience that demonstrates their aptitude for financial planning and investment management.

## PROFESSIONAL CERTIFICATIONS

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Some advisory representatives and financial planners have credentials or professional designations; however, no state or federal law requires these credentials.

**CFP®:** A Certified Financial Planner® designation is offered by the Certified Financial Planner Board of Standards, Inc. (CFP Board) to candidates with at least a bachelor's degree and three years of full-time pertinent experience and that complete a CFP-board registered program or hold certain designations, including a CFA. CFP professionals must agree to be bound by the CFP Board's Standards of Professional Conduct and complete 30 hours of continuing education every two years.

**ChFC®:** The Chartered Financial Consultant designation is issued by The American College and is granted to individuals who have at least three years of full-time business experience. The candidate is required to complete seven mandatory courses which include the following disciplines: financial, insurance, retirement and estate planning; income taxation, investments and application of financial planning; as well as two elective courses involving the application of the aforementioned disciplines. Each course has a final proctored exam and once issued, the individual is required to submit 30 hours of continuing education every two years and adhere to ethical standards.

**CLU:** This designation is issued by The American College and is granted to individuals who have at least three years of full-time business experience within the five years preceding the awarding of the designation. The candidate is required to take a series of mandatory courses which include, for example, the following: insurance planning, life insurance law, fundamentals of estate planning, planning for business owners, income taxation, group benefits, planning for retirement needs, and investments. Each course has a final proctored exam and once issued, the individual is required to submit 30 hours of continuing education every two years.

**PFP:** The Personal Financial Planning Certificate Program administered by UC Irvine Extension awards the PFP designation upon completion of eight required courses. The program is registered with the Certified Financial Planner Board of Standards.

The following sections provide information about Wealth Analytic Partners LLC's principals and advisory representatives.

**DAUM, TROY B., CFP®, CLU, ChFC**

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**DATE OF BIRTH:** 1960

**ITEM 2-SCHOOLING, EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE:**

Mr. Daum earned his CFP designation from the College of Financial Planning and the CFP Board of Standards in 1988. He earned his CLU designation from the American College, Pennsylvania in 1994 and his ChFC in 1995. Mr. Daum also attended Georgia State University. He worked as a Registered Representative, Registered Principal and Investment Advisory Associate for Hornor, Townsend and Kent from 2000 to 2004 and AXA Advisors, LLC from 1984 to 2000. He holds a California Life and Disability License. Mr. Daum is the owner of Wealth Analytics, Inc.

**ITEM 3-DISCIPLINARY INFORMATION:** None

**ITEM 4-OTHER BUSINESS ACTIVITIES:** None

**ITEM 5-ADDITIONAL COMPENSATION:** None

**ITEM 6-SUPERVISION:**

The Adviser supervises the activities of its employees to make certain each individual meets his fiduciary obligation to clients. The Adviser has established written policies and procedures ("Compliance Manual) and a Code of Ethics that describe its supervisory procedures. Gordon Tudor is the Chief Compliance Officer and is responsible for maintaining and enforcing these procedures and ensuring that the Adviser is in compliance with its regulatory and fiduciary obligations.

Gordon Tudor's contact information:

Phone: 858-794-2100

Email: [Gordon@wealthanalytics.com](mailto:Gordon@wealthanalytics.com)

## **TUDOR, GORDON, CFP®:**

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**DATE OF BIRTH:** 1957

### **ITEM 2-SCHOOLING, EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE:**

Mr. Tudor is a principal and founder of Wealth Analytics Partners, LLC, and the President and founder of Strategic Asset Management Group, LLC (SAMG). He began his professional career as a commercial real estate broker with Coldwell Banker Commercial Real Estate Services. In 1991 he founded the investment advisory firm of Strategic Asset Management Group specializing in providing comprehensive wealth management and retirement planning services to individuals and companies. Mr. Tudor earned his CFP designation from the College of Financial Planning and the CFP Board of Standards in 1999. He attended Pepperdine University.

Mr. Tudor was a Registered Representative, Registered Principal with NEXT Financial Group, Inc., June 2004 to April 2009. In addition, he worked as a Registered Representative, Registered Principal and Investment Advisory Associate at AXA, Advisors LLC from 1995 to 2004. He has a California Life and Disability License. In addition, Mr. Tudor is a licensed California Real Estate Broker.

**ITEM 3-DISCIPLINARY INFORMATION:** None

### **ITEM 4-OTHER BUSINESS ACTIVITIES:**

Mr. Gordon Tudor is a member of Strategic Asset Management Group (no longer registered as an investment adviser) and a licensed real estate broker. These activities account for approximately 25% of his time and compensation.

**ITEM 5-ADDITIONAL COMPENSATION:** None

### **ITEM 6-SUPERVISION:**

The Adviser supervises the activities of its employees to make certain each individual meets his fiduciary obligation to clients. The Adviser has established written policies and procedures ("Compliance Manual") and a Code of Ethics that describe its supervisory procedures. Gordon Tudor is supervised by Troy Daum, Principal. He reviews Gordon Tudor's work through frequent office interactions.

Troy Daum's contact information:

Phone: 858-794-2100 Email: [Troy@wealthanalytics.com](mailto:Troy@wealthanalytics.com)

## **GALLAHER, AUSTIN, PFP**

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**DATE OF BIRTH:** 1951

**ITEM 2-SCHOOLING, EDUCATIONAL BACKGROUND BUSINESS EXPERIENCE:**

Mr. Gallaher graduated from Revelle College at UCSD in 1974, with a major in English/ American Literature and a minor in Mathematics. He is a graduate of the University Extension program in Personal Financial Planning at UC Irvine. Prior to joining Wealth Analytics Partners in 2004, Mr. Gallaher worked as the financial plan designer for the Comprehensive Financial Group in San Diego from January of 2001 until June of 2004.

**ITEM 3-DISCIPLINARY INFORMATION:** None

**ITEM 4-OTHER BUSINESS ACTIVITIES:** None

**ITEM 5-ADDITIONAL COMPENSATION:** None

**ITEM 6-SUPERVISION:**

The Adviser supervises the activities of its employees to make certain each individual meets his fiduciary obligation to clients. The Adviser has established written policies and procedures ("Compliance Manual) and a Code of Ethics that describe its supervisory procedures. Austin Gallaher is supervised by Troy Daum, Principal. He reviews Austin Gallaher's work through frequent office interactions.

Troy Daum's contact information:

Phone: 858-794-2100 Email: [Troy@wealthanalytics.com](mailto:Troy@wealthanalytics.com)

## **MALDONADO, XAVIER**

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**DATE OF BIRTH:** 1977

**ITEM 2-SCHOOLING, EDUCATIONAL BACKGROUND BUSINESS EXPERIENCE:**

Mr. Maldonado joined Wealth Analytics Partners, LLC in October of 2010 as an Investment Advisory Associate. He graduated from Alliant International University with a Bachelor's Degree in International Business. In addition, Mr. Maldonado is currently enrolled in San Diego State University to earn a Master's Degree in Financial Service.

Prior to his employment with Wealth Analytics Partners, Mr. Maldonado worked as an Investment Adviser Representative for Advanced Wealth Planning from July 2008 to June 2010. From April 2008 to June 2010 Mr. Maldonado also worked as registered representative for First Allied Securities. Additionally, Mr. Maldonado was also employed with Lincoln Financial Advisors from February 2006 to April of 2008. Mr. Maldonado was previously employed by Lincoln National Life Insurance Company in 2006 in which he held the position of Sales Agent and Registered Representative and worked as a sales representative for U.S. Financial Management from 2005 to 2006.

**ITEM 3-DISCIPLINARY INFORMATION:** None

**ITEM 4-OTHER BUSINESS ACTIVITIES:** None

**ITEM 5-ADDITIONAL COMPENSATION:** None

**ITEM 6-SUPERVISION:**

The Adviser supervises the activities of its employees to make certain each individual meets his fiduciary obligation to clients. The Adviser has established written policies and procedures ("Compliance Manual") and a Code of Ethics that describe its supervisory procedures. Xavier Maldonado is supervised by Troy Daum, Principal. He reviews Xavier Maldonado's work through frequent office interactions.

Troy Daum's contact information:

Phone: 858-794-2100 Email: [Troy@wealthanalytics.com](mailto:Troy@wealthanalytics.com)