

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

Form ADV, Part 2A, Item 1

***Cover Page***

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**WATER DOG ASSET MANAGEMENT, LLC**

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**3617 Precision Drive, H-160  
Fort Collins, CO 80528**

**Tel: (303) 521-1562**

**July 12, 2018**

**FORM ADV PART 2  
FIRM BROCHURE**

**This brochure provides information about the qualifications and business practices of Water Dog Asset Management, LLC. If you have any questions about the contents of this brochure, please contact us at (303) 521-1562. 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 Water Dog Asset Management, LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The searchable IARD/CRD number for Water Dog Asset Management, LLC is 171885.**

**Water Dog Asset Management, LLC is a Registered Investment Adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.**

Form ADV, Part 2A, Item 2

***Material Changes***

Effective July 2018, Water Dog Asset Management, LLC became registered with the State of Colorado and is no longer under the jurisdiction of the Securities and Exchange Commission.

***Table of Contents***

**Table of Contents**

<b><i>Cover Page.....</i></b>	<b><i>1</i></b>
<b><i>Material Changes.....</i></b>	<b><i>2</i></b>
<b><i>Table of Contents.....</i></b>	<b><i>3</i></b>
<b><i>Advisory Business.....</i></b>	<b><i>4</i></b>
<b><i>Fees and Compensation.....</i></b>	<b><i>5</i></b>
<b><i>Performance-Based Fees and Side-By-Side Management.....</i></b>	<b><i>7</i></b>
<b><i>Types of Clients.....</i></b>	<b><i>7</i></b>
<b><i>Methods of Analysis, Investment Strategies and Risk of Loss.....</i></b>	<b><i>7</i></b>
<b><i>Disciplinary Information.....</i></b>	<b><i>9</i></b>
<b><i>Other Financial Industry Activities and Affiliations.....</i></b>	<b><i>9</i></b>
<b><i>Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....</i></b>	<b><i>10</i></b>
<b><i>Brokerage Practices.....</i></b>	<b><i>11</i></b>
<b><i>Review of Accounts.....</i></b>	<b><i>12</i></b>
<b><i>Client Referrals and Other Compensation.....</i></b>	<b><i>12</i></b>
<b><i>Custody.....</i></b>	<b><i>12</i></b>
<b><i>Investment Discretion.....</i></b>	<b><i>13</i></b>
<b><i>Voting Client Securities.....</i></b>	<b><i>13</i></b>
<b><i>Financial Information.....</i></b>	<b><i>13</i></b>
<b><i>Requirements for State Registered Advisors.....</i></b>	<b><i>13</i></b>

***Advisory Business***

Water Dog Asset Management, LLC is a Registered Investment Adviser founded in 2015, based in Fort Collins, CO, and incorporated under the laws of the State of Wyoming. Water Dog Asset Management, LLC is wholly-owned by Keith Gliner. Water Dog Asset Management, LLC is registered with the State of Colorado and is subject to its rules and regulations.

Water Dog Asset Management, LLC provides investment advisory services, which may include, but are not limited to, the review of client investment objectives and goals, recommending asset allocation strategies of managed assets among investment products such as cash, stocks, mutual funds and bonds, and/or preparing written investment strategies.

Water Dog Asset Management, LLC provides investment advisory services through its Investment Advisory Representatives ("IAR") to accounts opened with Water Dog Asset Management, LLC. Managed Accounts are available to both individuals and small businesses.

Water Dog Asset Management, LLC provides discretionary and non-discretionary investment advisory services to its clients through various managed accounts. Water Dog Asset Management, LLC will assist clients in determining the suitability of the managed account for the client. The firm is compensated through a comprehensive single fee. Water Dog Asset Management, LLC and its IAR, as appropriate, will be responsible for the following:

- Performing due diligence
- Recommending strategic asset and style allocations
- Providing research on investment product options, as needed
- Providing client risk profile questionnaire
- Obtaining investment advisory contract from client with required financial, risk tolerance, suitability and investment vehicle selection information for each new account
- Performing client suitability check on account documentation, review the investment objectives and evaluate the investment vehicle selections
- Providing Firm Brochure (this document)

Our investment advice is tailored to meet our clients' needs and investment objectives. Clients may impose restrictions on investing in certain securities or types of securities (such as a product type, specific companies, specific sectors, etc.) by providing a signed and dated written notification, of which an e-mail is also an acceptable form of notification. If a client chooses to notify Water Dog Asset Management, LLC of investment restrictions via e-mail, it must be understood that Water Dog Asset Management, LLC will not be held responsible for the terms of the notification until Water Dog Asset Management, LLC acknowledges receipt of the notification by e-mail to the client. This is to prevent there being a miscommunication between the client and Water Dog Asset Management, LLC in an instance where an e-mail is either not received or is not seen by the staff of Water Dog Asset Management, LLC.

As of March 12, 2018, the firm has the following Asset Under Management:

Discretionary: \$300,000.00  
Non-Discretionary: \$1,500,000.00

Form ADV, Part 2A, Item 5

### ***Fees and Compensation***

The following types of fees will be assessed:

**Asset Management** – Fees are charged quarterly in arrears and are based primarily on asset size and the level of complexity of the services provided. In individual cases, Water Dog Asset Management, LLC has the sole discretion to negotiate fees that are lower than the standard fee shown or to waive fees. Fees are not based on the share of capital gains or capital appreciation of the funds or any portion of the funds. Comparable services for lower fees may be available from other sources. Fees for the initial quarter will be prorated based upon the number of calendar days in the calendar quarter that the advisory agreement is in effect. Fees are based on the market value of the assets on the last business day of the quarter. Annual fees range from .50% - 1.00% depending on the amount of assets under management (“AUM”) – See chart below. Consulting services are included in these fees for asset management services.

Fee Schedule for Asset Management:

Total Account Value	Maximum Annual Advisory Fee
Under \$1,000,000	1.00%
\$1,000,001 - \$2,000,000	0.75%
\$2,000,001 - \$5,000,000	0.50%
\$5,000,000 or more	Negotiable

As authorized in the client agreement, the account custodian withdraws Water Dog Asset Management, LLC’s advisory fees directly from the clients’ accounts according to the custodian’s policies, practices, and procedures. The custodial statement includes the amount of any fees paid to Water Dog Asset Management, LLC for advisory services. You should carefully review the statement from your custodian and verify the calculation of fees and compare to the invoice you receive from Water Dog Asset Management, LLC. Your custodian does not verify the accuracy of fees calculations.

Fees are charged on a quarterly basis, meaning that advisory fees for a quarter are charged on the last day of the quarter. There will never be an instance where more than \$500 will be required or solicited, six or more months in advance of the services to be rendered. Clients may terminate investment advisory services obtained from Water Dog Asset Management, LLC, without fee or penalty, upon written notice within five (5) business days after entering into the advisory agreement with Water Dog Asset Management, LLC. The client is responsible for any fees and

charges incurred by the client from third parties as a result of maintaining the account such as transaction fees for any securities transactions executed and account maintenance or custodial fees. Thereafter, the client may terminate advisory services upon written notice delivered to and received by Water Dog Asset Management, LLC. Clients who terminate investment advisory services during a quarter are charged a prorated advisory fee based on the date of Water Dog Asset Management, LLC's receipt of client's written notice to terminate. Any earned but unpaid fees are immediately due and payable.

### **Additional Fees and Expenses**

In addition to advisory fees paid to Water Dog Asset Management, LLC as explained above, clients will pay custodial service, account maintenance, transaction, and other fees associated with maintaining the account. These fees vary by custodian. Clients should ask Water Dog Asset Management, LLC for details on transaction fees or other custodial fees specific to their account, as these fees are not included in the annual advisory fee. Water Dog Asset Management, LLC does not share any portion of such fees. Additionally, for any mutual funds purchased, the client may pay their proportionate share of the funds' distribution, internal management, investment advisory and administrative fees. Such fees are not shared with Water Dog Asset Management, LLC and are compensation to the fund manager.

Mutual funds purchased or sold in accounts may generate transaction fees that would not exist if the purchase or sale were made directly with the mutual fund company. Mutual funds held in accounts also charge management fees. These mutual fund management fees may be more or less than the mutual fund management fees charged if the client held the mutual fund directly with the mutual fund company.

Clients may purchase shares of mutual funds directly from the mutual fund issuer, its principal underwriter, or a distributor without purchasing the services of Water Dog Asset Management, LLC or paying the advisory fee on such shares (but subject to any applicable sales charges). Certain mutual funds are offered to the public without a sales charge. In the case of mutual funds offered with a sales charge, the prevailing sales charge (as described in the mutual fund prospectus) may be more or less than the applicable advisory fee. However, clients would not receive Water Dog Asset Management, LLC's assistance in developing an investment strategy, selecting securities, monitoring performance of the account, and making changes as necessary. Clients who wish to terminate the investment advisory agreement may do so with written notice. Upon receipt of written notification, any earned fee will immediately become due and payable. A client may terminate an advisory agreement without being assessed any fees or expenses within five (5) days of its signing.

Water Dog Asset Management, LLC nor its representatives receive any compensation other than the advisory fee as stated above.

For more information on the firm's required custodian, please refer to Item 12 "Brokerage Practices" of this brochure.

Form ADV, Part 2A, Item 6

### ***Performance-Based Fees and Side-By-Side Management***

Water Dog Asset Management, LLC does not charge performance-based fees or participate in side-by-side management.

Form ADV, Part 2A, Item 7

### ***Types of Clients***

Water Dog Asset Management, LLC offers investment advisory services to individuals and small businesses. Minimum amount required to open and maintain an advisory account is \$25,000.

Form ADV, Part 2A, Item 8

### ***Methods of Analysis, Investment Strategies, and Risk of Loss***

Water Dog Asset Management, LLC's methods of analysis and investment strategies incorporate the client's needs and investment objectives, time horizon, and risk tolerance. Water Dog Asset Management, LLC is not bound to a specific investment strategy for the management of investment portfolios, but rather consider the risk tolerance levels pre-determined gathered at the account opening, as well as on an on-going basis. Examples of methodologies that our investment strategies may incorporate include:

**Asset Allocation** – Asset Allocation is a broad term used to define the process of selecting a mix of asset classes and the efficient allocation of capital to those assets by matching rates of return to a specified and quantifiable tolerance for risk.

**Dollar-Cost Averaging** – Dollar-cost averaging is the technique of buying a fixed dollar amount of securities at regularly scheduled intervals, regardless of the price per share. This will gradually, over time, decrease the average share price of the security. Dollar-cost averaging lessens the risk of investing a large amount in a single investment at the wrong time.

**Technical Analysis** – involves studying past price patterns and trends in the financial markets to predict the direction of both the overall market and specific stocks.

**Long-Term Purchases** – securities purchased with the expectation that the value of those securities will grow over a relatively long period of time, generally greater than one year.

Investing in securities involves risk of loss that clients should be prepared to bear. Although we manage your portfolio with strategies and in a manner consistent with your risk tolerances, there can be no guarantee that our efforts will be successful. You should be prepared to bear the risk of loss.

Our strategies and investments may have unique and significant tax implications. Regardless of your account size or other factors, we strongly recommend that you continuously consult with a tax professional prior to and throughout the investing of your assets.

All investments involve the risk of loss, including (among other things) loss of principal, a reduction in earnings (including interest, dividends, and other distributions), and the loss of

future earnings. These risks include market risk, interest rate risk, issuer risk, and general economic risk. Regardless of the methods of analysis or strategies suggested for your particular investment goals, you should carefully consider these risks, as they all bear risks.

Water Dog Asset Management, LLC does not recommend a particular type of security, but rather we make our recommendations based on the clients' goals and investment objectives. All investments are subject to an inherent risk of loss. The value of securities in the portfolio can increase and decrease in a moment's notice. Accordingly, clients can lose money—including principal. The stock market is subject to significant fluctuations in value as a result of political, economic, and market developments. If the stock market declines in value, the portfolio is likely to decline in value. Because of changes in the financial condition or prospects of specific companies, the individual stocks selected by Water Dog Asset Management, LLC may decline in value, causing the account to decline in value. Additional information regarding risks of specific types of securities are as follows:

**Risks of Investments in Mutual Funds and Exchange-Traded Funds ("ETFs"):** As described above, Water Dog Asset Management, LLC may invest client portfolios in mutual funds and ETFs. ETFs may trade at a premium or a discount. Investments in pooled investment funds are generally less risky than investing in individual securities because of their diversified portfolios; however, these investments are still subject to risks associated with the markets in which they invest. In addition, pooled investment funds' success will be related to the skills of their particular managers and their performance in managing their funds. Pooled investment funds are also subject to risks due to regulatory restrictions applicable to registered investment companies under the Investment Company Act of 1940.

**ETF Tracking Risk:** ETFs will not be able to replicate exactly the performance of the indices they track because the total return generated by the securities will be reduced by transaction costs incurred in adjusting the actual balance of the securities. In addition, the ETFs incur expenses not incurred by their applicable indices. Certain securities comprising the indices tracked by the ETFs may, from time to time, temporarily be unavailable, which may further impede the ETFs' ability to track their applicable indices.

**Equity Market Risks:** Water Dog Asset Management, LLC may invest portions of client assets directly into equity investments or into pooled investment funds that invest in the stock market. As noted above, while pooled investments have diversified portfolios that may make them less risky than investments in individual securities, funds that invest in stocks and other equity securities are nevertheless subject to the risks of the stock market. These risks include, without limitation, the risks that stock values will decline due to daily fluctuations in the markets, and that stock values will decline over longer periods (e.g., bear markets) due to general market declines in the stock prices for all companies, regardless of any individual security's prospects.

**Fixed Income Risks:** Water Dog Asset Management, LLC may invest portions of client assets directly into fixed income instruments, such as bonds and notes, or may invest in pooled investment funds that invest in bonds and notes. While investing in fixed income instruments, either directly or through pooled investment funds, is generally less volatile than investing in stock (equity) markets, fixed income investments nevertheless are subject to risks. These risks include, without limitation, interest rate risks (risks that changes in interest rates will devalue the



investments), credit risks (risks of default by borrowers), or maturity risk (risks that bonds or notes will change value from the time of issuance to maturity).

Form ADV, Part 2A, Item 9

### ***Disciplinary Information***

Water Dog Asset Management, LLC or any management person has not been subject to a criminal or civil action.

Water Dog Asset Management, LLC or any management person has not been subject to an administrative proceeding by the SEC, any other financial regulatory agency, any state regulatory agency, or any foreign financial regulatory authority.

Water Dog Asset Management, LLC or any management person has not been subject to a proceeding by a self-regulatory organization.

Water Dog Asset Management, LLC or any management person does not have any other reportable disciplinary disclosures.

Form ADV, Part 2A, Item 10

### ***Other Financial Industry Activities and Affiliations***

Keith Gliner, owner and sole IAR of Water Dog Asset Management, LLC, is not currently registered with any broker dealer.

Neither Water Dog Asset Management, LLC nor its representatives are registered as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor.

Neither Water Dog Asset Management, LLC nor its representatives have any other financial industry activities or affiliations.

Neither Water Dog Asset Management, LLC nor its representatives recommend or select any other investment advisers for compensation, nor does the firm or any of its representatives have any other conflicts of interest.

Form ADV, Part 2A, Item 11

### ***Code of Ethics, Participation or Interest in Client Transactions and Personal Trading***

Water Dog Asset Management, LLC's Code of Ethics includes guidelines for professional standards of conduct for our Associated Persons. Our goal is to protect client interests at all times and to demonstrate our commitment to fiduciary duties of honesty, good faith, and fair dealing. All of Water Dog Asset Management, LLC's Associated Persons are expected to strictly adhere to these guidelines. Persons associated with Water Dog Asset Management, LLC are also required to report any violations to the Code of Ethics. Additionally, the firm maintains and enforces written policies reasonably designed to prevent the misuse or dissemination of

material, non-public information about our clients or client accounts by persons associated with our firm.

Water Dog Asset Management, LLC's Code of Ethics is available to you upon request. You may obtain a copy of our Code of Ethics by contacting Keith Gliner at (303) 521-1562.

Water Dog Asset Management, LLC or its representatives do not recommend, or buy or sell securities in client accounts, for which the firm or related person has a material financial interest.

Water Dog Asset Management, LLC does not buy or sell securities for itself that we also recommend to clients. In addition, our Principal and sole IAR, Keith Gliner, does not buy or sell the same securities for his personal and family accounts that are bought and sold for your account(s).

Water Dog Asset Management, LLC nor any related person recommends securities to clients, or buy or sells securities for client accounts, at or about the same time that the firm or related person buys or sells securities for its own account.

Form ADV, Part 2A, Item 12

### ***Brokerage Practices***

Water Dog Asset Management, LLC requires the custodial services of TD Ameritrade Institutional, a division of TD Ameritrade, Inc. Member FINRA/SIPC ("TD Ameritrade"), for which we have an existing relationship. Our relationship with TD Ameritrade may include benefits provided to our firm, including research, market information, and administrative services that help our firm manage your account(s). In considering which independent qualified custodian will be the best fit for Water Dog Asset Management, LLC's business model, we evaluate the following factors, which is not an all-inclusive list:

- Financial strength
- Reputation
- Reporting capabilities
- Execution capabilities
- Pricing, and
- Types and quality of research

We require that you establish an account with a custodian with which we have an existing relationship. Such relationships may include benefits provided to our firm, including research, market information, and administrative services that help our firm manage your account(s). We believe that required custodian provides quality execution services for our clients at competitive prices. Price is not the sole factor we consider in evaluating best execution. We also consider the quality of the brokerage services provided by the recommended custodian, including the value of research provided, the firm's reputation, execution capabilities, commission rates, and responsiveness to our clients and our firm.

Water Dog Asset Management, LLC does not combine multiple orders for shares of the same securities purchased for advisory accounts we manage (the practice of combining multiple orders for shares of the same securities is commonly referred to as “block trading”). Water Dog Asset Management, LLC gives each client individualized services based on the customer’s financial goals and risk tolerance. Based on the differing needs of every client, Water Dog Asset Management, LLC does not find that it is common practice for different clients to benefit from the same trades at the exact same time. By not aggregating orders, clients may incur a higher charge than with a firm that does aggregate orders due to larger volume discounts.

Although Water Dog Asset Management, LLC does not have any formal soft dollar agreements, we do receive benefits as described above.

Water Dog Asset Management, LLC does not receive client referrals from custodians in exchange for cash or other compensation, such as brokerage services or research.

Form ADV, Part 2A, Item 13

### ***Review of Accounts***

Client accounts are reviewed at least quarterly by Keith Gliner, Principal Executive Officer of the firm. Keith Gliner reviews clients’ accounts with regards to their investment policies and risk tolerance levels. All accounts at Water Dog Asset Management, LLC are assigned to this reviewer.

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

The firm invites the client to review the accounts and investment objectives at least annually.

Form ADV, Part 2A, Item 14

### ***Client Referrals and Other Compensation***

Water Dog Asset Management, LLC does not compensate any individual or firm for client referrals. In addition, Water Dog Asset Management, LLC does not receive compensation from any third party.

Form ADV, Part 2A, Item 15

### ***Custody***

Any investment advisor having custody or access to customer funds or securities must comply with certain rules and regulations designed to protect the clients’ assets. Rule 206(4)-2 of the Investment Advisers Act of 1940 and similar state statutes and rules details strict requirements governing investment advisors that have “custody” over client securities or funds. Water Dog Asset Management, LLC meets the definition of having custody due to the following circumstances:

- Water Dog Asset Management, LLC is authorized to instruct custodian to directly debit advisory fees from client accounts, with written authorization

Water Dog Asset Management, LLC does not have physical custody of any client funds and/or securities, and does not take custody of client accounts at any time. Client funds and securities will be held with a bank, broker dealer, or other independent qualified custodian. You will receive account statements from the independent, qualified custodian holding your funds at least quarterly. The account statement from your custodian will indicate the amount of advisory fees deducted from your account(s) each billing cycle. Clients should carefully review statements received from the custodian. Water Dog Asset Management, LLC also sends quarterly invoices detailing the manner and amount of advisory fees to all clients.

Form ADV, Part 2A, Item 16

### ***Investment Discretion***

Water Dog Asset Management, LLC offers discretionary and non-discretionary asset management. Before Water Dog Asset Management, LLC can buy or sell securities on your behalf, you must first sign our Investment Advisory Agreement, which states whether the accounts will be managed on a discretionary or non-discretionary basis. For accounts that the firm manages on a discretionary basis, you are required to sign a discretionary management agreement, a limited power of attorney, and/or trading authorization forms. By choosing to do so, you may grant the firm discretion over the selection and amount of securities to be purchased or sold for your account(s) without obtaining your consent or approval prior to each transaction. Clients may impose limitations on discretionary or non-discretionary authority for investing in certain securities or types of securities (such as a product type, specific companies, specific sectors, etc.), as well as other limitations as expressed by the client. Limitations on discretionary authority are required to be provided to the IAR in writing. Please refer to the “Advisory Business” section of this Brochure for more information on our discretionary management services.

Form ADV, Part 2A, Item 17

### ***Voting Client Securities***

We do not vote proxies on behalf of your advisory accounts. At your request, we may offer you advice regarding corporate actions and the exercise of your proxy voting rights. If you own shares of common stock or mutual funds, you are responsible for exercising your right to vote as a shareholder.

In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward any electronic solicitation to vote proxies.

A written copy of the proxy policies and procedures are available upon request.

***Financial Information***

Water Dog Asset Management, LLC is not required to provide financial information to our clients because we do not require or solicit the prepayment of more than \$500 six or more months in advance.

***Requirements for State-Registered Advisers***

Principal Executive Officers and Management Persons Education and Business Background:

Keith Gliner  
Managing Principal and CCO

**Business Background:**

Caesars Entertainment, Las Vegas, NV - Marketing Analytics Manager - May 2013 - May 2014

The Coca-Cola Company, Atlanta, GA - Senior Trade Spend Manager - January 2011 - January 2013

The Coca-Cola Company, Denver, CO - Category Analysis Manager - June 2006 - December 2010

The Nielsen Company, Cherry Hill, NJ - Analytics Director - June 2004 - June 2006

**Educational Background:**

Bachelor of Arts, Economics, 1993-University of Colorado

Master of Arts, Economics, 1995-University of Colorado

None of the Principal Executive Officers and Management persons listed have had any complaints or any events required to be disclosed in this section.