

# **WAGN Advisory Services, LLC**

## **Form ADV Part 2A – Disclosure Brochure**

**Effective: January 22, 2021**

This Form ADV Part 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of WAGN Advisory Services, LLC (“WAGN Advisory Services” or the “Advisor”). If you have any questions about the content of this Disclosure Brochure, please contact the Advisor at (513) 295-6777.

WAGN Advisory Services is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). The information in this Disclosure Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about WAGN Advisory Services to assist you in determining whether to retain the Advisor.

Additional information about WAGN Advisory Services and its Advisory Persons is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor’s firm name or CRD# 311915.

**WAGN Advisory Services, LLC**  
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## Item 2 – Material Changes

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Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about the Advisory Persons of WAGN Advisory Services. For convenience, the Advisor has combined these documents into a single disclosure document.

WAGN Advisory Services believes that communication and transparency are the foundation of its relationship with clients and will continually strive to provide you with complete and accurate information at all times. WAGN Advisory Services encourages all current and prospective clients to read this Disclosure Brochure and discuss any questions you may have with the Advisor.

### Material Changes

WAGN Advisory Services is a newly formed registered investment advisor. This is the initial filing of the Disclosure Brochure.

### Future Changes

From time to time, the Advisor may amend this Disclosure Brochure to reflect changes in business practices, changes in regulations or routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to you annually and if a material change occurs.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or CRD# 311915. You may also request a copy of this Disclosure Brochure at any time by contacting the Advisor at (513) 295-6777.

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## **Item 4 – Advisory Services**

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### **A. Firm Information**

WAGN Advisory Services, LLC (“WAGN Advisory Services” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). The Advisor is organized as a Limited Liability Company (LLC) under the laws of the State of Colorado. WAGN Advisory Services was founded in January 2021 and is owned by Wealth Advisor Growth Network LLC and operated by John Phoenix (President) and Jay Hummel (Chief Compliance Officer). This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by WAGN Advisory Services.

### **B. Advisory Services Offered**

WAGN Advisory Services assists investment advisory firms (each referred to as an “Investor”) by discussing with them their investment needs and objectives and referring them to other registered investment advisory firms to provide outsourced investment management services (each a “Third-Party RIA”).

WAGN Advisory Services does not manage Investor assets. In successfully referring Investors with Third-Party RIAs, WAGN Advisory Services will receive a referral fee for its services. Upon making a referral recommendation, the Investor will be provided with a written solicitor disclosure statement describing the relationship between WAGN Advisory Services and the applicable Third-Party RIA, including information regarding the compensation received by WAGN Advisory Services for the referral (the “Disclosure Statement”). In addition, WAGN Advisory Services will provide the Form ADV2A – Disclosure Brochure for the respective Third-Party RIA. For additional information regarding the compensation arrangement, please see Item 5 below.

### **C. Client Account Management**

WAGN Advisory Services does not manage Investor assets and therefore has no disclosure for this item.

### **D. Wrap Fee Programs**

WAGN Advisory Services does not manage or place Investor assets into a wrap fee program and therefore has no disclosure for this item.

### **E. Assets Under Management**

WAGN Advisory Services does not manage Investor assets and therefore has no disclosure for this item.

## **Item 5 – Fees and Compensation**

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WAGN Advisory Services is compensated through referral fee arrangements with Third-Party RIAs pursuant to a solicitor agreement. WAGN Advisory Services is only compensated if an Investor engages with a Third-Party RIA that has contracted with WAGN Advisory Services to share in the revenue generated by the Investor’s relationship with the Third-Party RIA. The referral fee is disclosed to each prospective investor in the Disclosure Statement provided by WAGN Advisory Services.

Third-Party RIAs may terminate their relationship pursuant to the terms of their solicitor agreement with WAGN Advisory Services. The agreement[s] between the Investor and a Third-Party RIA are governed by the terms of the agreement between those parties. Please see Item 10 and Item 14 below for additional details.

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

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WAGN Advisory Services does not manage Investor assets nor charges performance-based fees and therefore has no disclosure for this item.

## **Item 7 – Types of Clients**

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WAGN Advisory Services supports Investors with their investment needs. WAGN Advisory Services does not manage any Investor accounts and solely refers Investors to Third-Party RIAs.

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

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### **A. Methods of Analysis**

WAGN Advisory Services does not manage Investor assets. WAGN Advisory Services recommends Third-Party RIAs to provide outsourced investment management services to Investors.

## **Item 9 – Disciplinary Information**

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**There are no legal, regulatory or disciplinary events involving WAGN Advisory Services or its management persons.** WAGN Advisory Services values the trust Investors and Third-Party RIAs place in the Advisor. The Advisor encourages Investors and Third-Party RIAs to perform the requisite due diligence on any advisor or service provider in which they engage. The backgrounds of the Advisor or Advisory Persons are available on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or CRD# 311915.

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

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### Wealth Advisor Growth Network LLC

The Advisor is a wholly owned subsidiary of Wealth Advisor Growth Network LLC ("WAGN"). WAGN provides growth capital, management resources, strategic opportunities and direction to investment advisory firms ("Network Advisors"). Network Advisors will be prompted to engage with WAGN Advisory Services for referrals to Third-Party RIAs who will provide Network Advisors with outsourced investment management services. WAGN Advisory Services is compensated by Third-Party RIAs for each successful referral. Due to common ownership, this presents a conflict of interest as management persons of WAGN stand to benefit from successful referral engagements. WAGN Advisory Services will provide all Network Advisors with full and fair disclosure of this conflict prior to engaging with a Third-Party RIA. Additionally, WAGN Advisory Services will only refer Network Advisors to Third-Party RIAs only after a thorough due diligence to ensure that the referral will be in the Network Advisors' best interest.

### Other Registered Investment Advisors

The Advisor maintains an affiliation with various registered investment advisors who are deemed related persons ("Affiliated Advisors"). The Advisor does not recommend any Affiliated Advisors to Investors, nor are the Third-Party RIAs affiliated with WAGN Advisory Services. Therefore, these Affiliated Advisors do not present a material conflict with the services provided by the Advisor, Investors or Third-Party RIAs.

## **Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

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### **A. Code of Ethics**

WAGN Advisory Services has implemented a Code of Ethics (the "Code") that defines the Advisor's fiduciary commitment to each Investor and Third-Party RIA. This Code applies to all persons associated with WAGN Advisory Services ("Supervised Persons"). The Code was developed to provide general ethical guidelines and specific instructions regarding the Advisor's duties to each Investor and Third-Party RIA. WAGN Advisory Services and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Investor and Third-Party RIA. It is the obligation of WAGN Advisory Services' Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code covers a range of topics that address employee ethics and conflicts of interest. To request a copy of the Code, please contact the Advisor at (513) 295-6777.

## **Item 12 – Brokerage Practices**

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WAGN Advisory Services does not select or recommend broker-dealers/custodians. WAGN Advisory Services refers investment advisory firms to Third-Party RIAs, which may recommend these providers to complement and support their services. Please see the Third-Party RIA's Form ADV Part 2A – Disclosure Brochure for information regarding Brokerage Practices.

## **Item 13 – Review of Accounts**

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WAGN Advisory Services does not manage any Investor assets, and therefore does not conduct reviews on Investor accounts. WAGN Advisory Services recommends Third-Party RIAs for such services. These Third-Party RIAs will be responsible for all account and performance reviews. Please see the Third-Party RIA's respective Form ADV Part 2A – Disclosure Brochure for additional details regarding review of accounts.

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

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### **A. Compensation Received by WAGN Advisory Services**

As noted in Item 4, WAGN Advisory Services recommends that Investors utilize the outsourced asset management services of Third-Party RIAs and place their assets with one or more these Third-Party RIAs. WAGN Advisory Services will receive referral compensation from the Third-Party RIAs for which the Institutions engages for outsourced investment management services.

### **B. Client Referrals from Solicitors**

WAGN Advisory Services does not engage paid solicitors for referrals.

## **Item 15 – Custody**

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WAGN Advisory Services does not accept or maintain custody of any Investor assets.

## **Item 16 – Investment Discretion**

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WAGN Advisory Services does not have investment discretion over Investor assets.

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

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WAGN Advisory Services does not accept proxy-voting responsibility for any Investor or Third-Party RIA.

## **Item 18 – Financial Information**

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Neither WAGN Advisory Services, nor its management, have any adverse financial situations that would reasonably impair the ability of WAGN Advisory Services to meet all obligations to its Investors and Third-Party RIAs. Neither WAGN Advisory Services, nor any of its Advisory Persons, have been subject to a bankruptcy or financial compromise. WAGN Advisory Services is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect advance fees of \$1,200 or more for services to be performed six months or more in the future.

## Privacy Policy

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Effective: January 22, 2021

### Our Commitment to You

WAGN Advisory Services, LLC ("WAGN Advisory Services" or the "Advisor") is committed to safeguarding the use of personal information of our Clients (also referred to as "you" and "your") that we obtain as your Investment Advisor, as described here in our Privacy Policy ("Policy").

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. WAGN Advisory Services (also referred to as "we", "our" and "us") protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

WAGN Advisory Services does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

### Why you need to know?

Registered Investment Advisors ("RIAs") must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

### What information do we collect from you?

Driver's license number	Date of birth
Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number[s]	Income and expenses
E-mail address[es]	Investment activity
Account information (including other institutions)	Investment experience and goals

### What Information do we collect from other sources?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

### How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client's personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

### How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
<b>Servicing our Clients</b> We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.	Yes	No
<b>Marketing Purposes</b> WAGN Advisory Services does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where WAGN Advisory Services or the client has a formal agreement with the financial institution. <b>We will only share information for purposes of servicing your accounts, not for marketing purposes.</b>	No	Not Shared
<b>Authorized Users</b> Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent[s] or representative[s].	Yes	Yes
<b>Information About Former Clients</b> WAGN Advisory Services does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

### Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this Policy and will provide you with a revised Policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

### Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (513) 295-6777.