



**Firm Brochure**  
**(Part 2A of Form ADV)**

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This brochure provides you with information about the qualifications, business practices and nature of advisory services of Wealth Strategies Group, all of which should be considered before becoming an advisory client of our Firm. Please contact Travis Allen, Chief Compliance Officer, if you have any questions about this narrative brochure.

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC"), or by any state securities authority.

We are registered as an Investment Adviser with the State of California. Registration does not imply a certain level of skill or training. Additional information about our Firm is available on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by a unique identifying number known as a CRD number. Our Firm's CRD number is 316461.

March 31, 2022

## **Item 2      Material Changes**

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This version of Part 2A of Form ADV ("**Firm Brochure**") and Part 2B of Form ADV ("**Supplement Brochure**"), dated **March 31, 2022**, is an annual brochure document. As you will see, this document is narrative format. It contains information about our business practices as well as a description of potential conflicts of interest relating to our advisory business which could affect your account with us.

This Firm Brochure is a disclosure document and has been prepared by Wealth Strategies Group, ("**WSG**" or the "**Firm**") in accordance with applicable rules and requirements.

### **Material Changes since the Last Update**

The Firm has had no material changes since our initial ADV Part 2A filing in October 2021. The firm may at any time update this document and either send a copy of its updated brochure or provide a summary of material changes to its brochure and an offer to send an electronic or hard copy form of the updated brochure. Clients are also able to download this brochure from the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) or may contact our firm at (714) 384-4144 to request a copy at any time. This brochure will be amended anytime there is a material change and this section will include a summary of any material changes.

### **Full Brochure Available**

We will provide you with a full version of the Firm Brochure as necessary based on changes or new information, at any time, without charge. Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at (714) 384-4144 or by email at: [travis@wealthstrategiesgroup.com](mailto:travis@wealthstrategiesgroup.com)

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## **Item 4      Advisory Business**

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### **FIRM DESCRIPTION**

Wealth Strategies Group (“**WSG**” or the “**Firm**”) is organized as a California S corporation.

WSG’s current business activities consist of providing investment advisory services to individuals, high net worth individuals, families, profit-sharing plans, trusts, estates, and small businesses in California and other states (each referred to as a “Client”).

**Principal Owner:** Travis Allen, the Firm’s Chief Investment Officer and Chief Compliance Officer, wholly owns Wealth Strategies Group.

The Firm became registered as a Registered Investment Advisor and is registered with the State of California.

### **TYPES OF ADVISORY SERVICES**

For our investment advisory clients, the Firm presently offers the following types of advisory services:

- I.    WSG Financial Advisory Portfolio**
- II.   Wrap Fee Program—Offered through Orion Portfolio Solutions**
- III.   WSG Retirement Plan Consulting**

### **WSG Portfolio Management**

In a WSG Portfolio Management account, our investment advisors manage money for Clients on a non-wrap fee basis (see below for wrap fee option), using investment vehicles suitable for Clients, such as equities, mutual funds, exchange traded funds, options and bonds. Our firm provides continuous advice to a client regarding the investment of client funds based on the individual needs of the client. Through personal discussions in which goals and objectives based on a client's particular circumstances are established, we develop a client's personal investment policy or an investment plan and create and manage a portfolio that best suits the clients needs. During our data-gathering process, we determine the client’s individual objectives, time horizons, risk tolerance, and liquidity needs. We may also review and discuss a client’s prior investment history, as well as family composition and background. Accounts are managed on a discretionary basis, meaning that the advisor has discretion over what securities to buy and sell. This trading discretion and any limitations on it will be set forth in the client agreement. The services provided are the same regardless of the account structure selected.

We will regularly rebalance or adjust client accounts under our management. If the client experiences any significant changes to his/her financial or personal circumstances, the client must notify us so that we can consider such information in managing the client’s investments. As part of your advisory agreement, the Firm may offer events within the community which is free of charge.

### **Held Away Account Services:**

We provide certain services for accounts that are not directly held in our custody such as 401(k) accounts, 529 plans, variable annuities, and other assets we do not custody. We

regularly review the current holdings and available investment options in these accounts, and provide advice to our clients. We do not charge a separate fee for these services. These services are included in your annual asset fee.

#### **WRAP FEE PROGRAMS**

WSG makes available to its clients the following investment advisory program (the “Programs”), sponsored by Orion Portfolio Solutions. A wrap fee program is an investment advisory program in which you pay one fee for both investment advisory services and transaction costs in your account. The wrap fee is not based directly upon the actual transaction or execution costs for the transactions within your account.

Under a typical wrap fee program, you pay a higher advisory fee and transaction costs are billed to your advisor. In this scenario, our advisors may have a financial incentive not to place transaction orders in those accounts since doing so increases their transaction costs. However, under OPS’s agreement with the custodians who maintain your account, OPS is charged an asset-based fee. OPS is not charged individual transaction fees. Accordingly, the fee paid by OPS for transaction costs is not dependent on how frequently we trade your account. The Account may also be charged for expenses or services that are not covered by the wrap fee; these will be described in the Program’s separate “Wrap Brochure” provided to the client or in the client’s separate agreement with Orion Portfolio Solutions.

You may receive comparable services from other broker-dealers or investment advisers and pay fees that are higher or lower than those charged under the Program. Fees may be more or less than you would have paid if the services (account management, custody, and brokerage transactions) were purchased separately outside of the wrap fee program.

The Firm offers the Stock/ETF Strategist Program, which is further described below.

#### **Stock/ETF Strategist Program**

OPS provides a fee-based platform for our Advisors to develop their own model portfolios (the “Stock/ETF Strategist Program”). For the Stock/ETF Strategist Program, OPS retains third-party investment managers that are not affiliated with OPS (“Strategists”), to design and manage model portfolios that we utilize to manage client assets. OPS’ Stock/ETF Strategist Program provides access to asset allocation models developed by the Strategists (“Strategist Models”). OPS engages Strategists to develop and manage Strategists Models, and the Strategists determine which investments to include in the Strategists Models. The Strategist will periodically adjust and rebalance the Strategist Model investments to remain consistent with their investment strategies. In the Stock/ETF Strategist Program, the Strategists are not acting as your investment advisor and do not possess knowledge of your individual information or investment goals and objectives. Further, the Strategists do not provide personalized investment advice to you. You remain the owner of all securities held in your Strategist Model account and have all ownership rights associated with these securities. Any modification to the Strategists Models by the Strategists is conducted through the sale and purchase of securities in your account, which may create tax ramifications for you.

## FINANCIAL PLANNING SERVICES & INVESTMENT CONSULTING

WSG provides a broad range of financial planning solutions to its clients. For those interested in areas such as: cash flow and budgeting, education funding, retirement planning, charitable planning, education planning, insurance reviews, corporate and personal financial planning, estate planning, tax planning, as well as periodic investment advice, we offer our *financial planning and investment consultation services*.

Financial planning and investment consultation services may be as broad-based or narrowly focused as you desire. The incorporation of most or all of the listed components allows not only a more thorough analysis but also an in-depth view of your plans to assist you in reaching your goals and objectives. This planning or consulting may encompass one or more of the following areas:

- **Investment Planning** is the process of identifying financial goals and converting them through building a plan.
- **Retirement Planning** is the process of determining retirement income goals, and the actions and decisions necessary to achieve those goals. Retirement planning includes identifying sources of income, sizing up expenses, implementing a savings program, and managing assets and risk.
- **Estate Planning** is the preparation of tasks that serve to manage an individual's asset base in the event of their incapacitation or death.
- **Charitable Planning** helps you make sizeable gifts that benefit both charity and your family as a part of your estate plan
- **Education Planning** is the identification, development, and implementation of strategies designed to attain, efficiently and effectively, the educational needs and goals of students.
- **Corporate and Personal Tax Planning** is the analysis of a financial situation or plan from a tax perspective. The purpose of tax planning is to ensure tax efficiency, with the elements of the financial plan working together in the most tax-efficient manner possible. Tax planning is an important part of a financial plan, as reducing tax liability and maximizing eligibility to contribute to retirement plans.
- **Cash Flow Analysis** helps determine a company's working capital—the amount of money available to run business operations and complete transactions.
- **Insurance Policy Reviews** is designed to help clients determine if their existing insurance coverage meets their needs.
- **Business Financial Planning** is designed to forecast future financial results and determine how best to use the company's financial resources in pursuit of the organization's short- and long-range objectives

- **Personal Financial Planning** is a process where an individual maximizes the existing financial resources through proper management of finances to best achieve his/her financial goals and objectives.

### **Investment Consultation**

Our investment consultation services may involve providing information on the types of investment vehicles available, employee retirement plans and/or stock options, investment analysis and strategies, asset selection and portfolio design, as well as assisting you with your investment account if it is maintained at another broker/dealer or custodian. The strategies and types of investments we may recommend are further discussed in Item 8 of this brochure.

### **Periodic Review**

We strongly urge our clients to notify us of any change in their circumstances, and to schedule a review any time there is such a change. An annual review should be considered even if there is not a substantial change, because tax laws, estate laws, and investment vehicles are always changing. Additional information may be found in Item 13 of this brochure.

For certain financial planning engagements, the Advisor will provide a written summary of Client's financial situation, observations, and recommendations. For consulting or ad-hoc engagements, the Advisor may not provide a written summary. Plans or consultations are typically completed within twelve months of contract date, assuming all information and documents requested are provided promptly.

Typically, clients engaging the firm to provide financial planning or financial consultation services are required to enter into a separate written agreement setting forth the terms and conditions of the planning engagement and describing the scope of the services to be provided. Financial planning clients need not necessarily become investment management clients of the firm. WSG does not make any representation that these products and services are offered at the lowest available cost and the client may be able to obtain the same products or services at a lower cost from other providers. However, the client is under no obligation to accept any of the recommendations of WSG or use the services of WSG. Implementation of the recommendations will be at the discretion of the client. Clients have the option to purchase investment products that the Adviser recommends through other brokers or agents that are not affiliated with the Adviser or investment adviser representatives.

### **Engagement with Wealth Strategies Group**

During or prior to your first meeting with our firm you will be provided with a current Form ADV Part 2 firm brochure that includes a statement about our privacy policy (found in Item 11). We will also ensure that we disclose any material conflicts of interest that could be reasonably expected to impair the rendering of unbiased and objective advice.

When engaging WSG for its advisory services, you must first enter into a written agreement with our firm. Thereafter, discussion and analysis will be conducted to determine your financial needs, goals, holdings, etc. Depending on the scope of the engagement, you may be

asked to provide current copies of documents so it will help us understand your needs and financial goals.

It is important that the information and/or financial statements you provide are accurate. Our firm may, but is not obligated to, verify the information you have provided, which will then be used in the investment advisory process. It is also necessary that you provide us with an adequate level of information and supporting documentation throughout the term of the engagement including, but not limited to source of funds, income levels, and an account holder or their legal agent's authority to act on behalf of the account, among other information. This helps us determine the appropriateness of our planning and/or investment strategies for your portfolio. It is also very important that you keep us informed of significant changes that may call for an update to your investment plans. Events such as changes in employment or marital status, an unplanned windfall, etc., can have an impact on your circumstances and needs. We need to be aware of such events, so that we may adjust as necessary in order to keep you on track toward your goals.

### **Participation in Wrap Fee Programs**

We neither sponsor nor act as the investment advisor to wrap fee investment programs.

### **ASSETS UNDER MANAGEMENT**

As of December 31, 2021, the Firm had \$0 discretionary assets and \$0 non-discretionary assets under management.

## **Item 5 Fees and Compensation**

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### **PORTFOLIO MANAGEMENT SERVICE FEES**

The specific way fees are charged by the Firm is established in a client's written agreement. Fees are based on a percentage of assets under management and calculated at an annual rate and billed monthly based upon the average daily balance for the month ending on the last day of each month. Fees are charged monthly in arrears. The first payment is calculated based on the number of days assets are placed in the account during a calendar month.

Fees are automatically deducted from the account pursuant to the advisory agreement and are not billed separately to clients. Clients must maintain or deposit sufficient funds in the account to cover payment of all fees authorized by the contract. The amount of the fee, the formula used to calculate the fee, the fee calculation itself, and the time covered by the fee, will be on the account statement received by the Custodian. The Firm urges clients to carefully review such statements.

Clients authorize WSG to deduct its monthly investment advisory fee directly from their custodial account. This authorization is granted under the terms of the client's signed investment management agreement and the client's instructions to the custodian. If assets are deposited into or withdrawn from a client's account after the inception of a billing period and depending upon the timing or size of such withdrawal or deposit, the fee will be prorated based upon the number of days the account was open during the billing period. The monthly fee is computed using an average daily balance for the month ending on the



last day of the month, which allows our firm to readily adjust for additions and withdrawals, as well as mid-cycle account openings or closures. Client fees are negotiable between the Representative and the Client.

Portfolio management services accounts are assessed an annualized asset-based fee that is based on the average daily balance during the calendar month. Using an average daily balance allows our firm to readily adjust for additions and withdrawals, as well as mid-cycle account openings or closures. We bill monthly, in arrears, per the following table:

<b>Annual Percentage of Assets Charge</b>	<b>Monthly Asset-Based Fee</b>
1.25% (125 basis points)	0.0010% (10.4 basis points)

We aggregate portfolio management services accounts for the same individual or two or more accounts within the same family, or accounts where a family member has power of attorney over another family member or incompetent person's account. Should investment objectives be substantially different for any two or more household accounts, requiring different investment approaches or operational requirements, we reserve the right to apply our fee schedule separately to each account. Your first billing cycle will at the end of the month in which your agreement is executed with our firm. If your agreement is executed during a billing cycle, the firm will pro-rate the monthly asset fee based upon the number of days the account was open during that billing period.

Because we charge an asset-based fee for portfolio management services, the more assets that are in your advisory account, the more you will pay in fees. This presents a conflict of interest because the firm has an incentive to encourage you to increase the assets in your account. Advice and recommendations can also be given on non-securities matters and any implementation of our recommendations is entirely at your discretion. You are always free to accept or reject any or all recommendations we make, and you retain the authority and discretion on whether to implement any recommendations. A client has a right to terminate the contract without penalty within five business days after entering into the contract.

### **Wrap Fee Program Fees**

Each program or strategy has a different program fee schedule, which can vary depending on the particular investment strategies or portfolios selected by the client, the manager selected by the client, and the individual Advisor. Generally, the Advisor may, in his or her discretion, negotiate the portion of the program fee that is payable to the Advisor or the Firm, but does not negotiate the portion payable to third-party manager. Fees will be charged in arrears, and the Client's Advisory Agreement will state the specific program fee applicable to client's Account.

Please see the Part 2A Wrap Fee Brochure for Orion Portfolio Solutions, who is the sponsor of the wrap fee program for a more detailed fee schedule.

The program fees are subject to exclusions, calculations, and conditions contained in each Program's Disclosure Document and Advisory Agreement. The Disclosure Document for each program contains important information regarding other fees you may be charged such as an annual fee, administration fees, termination fees, and other fees, conflicts of interest, compensation, risks, potential benefits, and other information that prospective investors should review and consider. Fees are based on the average daily account balance for the previous month. If your account was not open for the entire month, then the fee will be prorated. You should carefully review all fees charged by OPS, and your Investment Advisor, to fully understand the total amount of fees that are paid. It is your responsibility to verify the accuracy of the fee we charge to your account. The fee collected will appear on your custodial statement, though the custodian does not determine whether the fee has been properly calculated.

Wrap Fee accounts are assessed an annualized asset-based fee that is based on the average daily balance during the calendar month. Using an average daily balance allows our firm to readily adjust for additions and withdrawals, as well as mid-cycle account openings or closures. We bill monthly, in arrears, per the following table:

<b>Annual Percentage of Assets Charge</b>	<b>Monthly Asset-Based Fee</b>
1.25% (125 basis points)	0.0010% (10.4 basis points)

Fees charged by OPS are separate and distinct from fees and expenses charged by your Advisor.

### **Financial Planning Fixed Fee**

Our services typically begin via a financial planning engagement so that each of our clients has a foundation: a personalized plan that includes stated goals and objectives. This service is offered on a fixed fee basis for \$2,500 per plan. We do not require a retainer and the estimated financial planning or consulting fee we quote is due upon engagement.

All fees are non-negotiable and is due upon engagement, however, we will not bill an amount above \$2,500 in six (6) months or more in advance of the delivery of the financial plan to the client. In all instances, we will send you a written invoice, including the fee, and the time period covered by the fee.

Fees for our planning services take into consideration factors such as the complexity of your financial profile; the time involved developing your plan and assisting you in its execution, assets that comprise your overall portfolio, as well as the number of individual accounts comprising the portfolio.

### **OTHER FEES**

Clients will incur transaction charges for trades executed in their accounts that we do not receive. The fees described above do not include certain charges imposed by third parties such as custodial fees, charges imposed directly by a mutual fund or ETF in the account—which shall be disclosed in the fund's prospectus (e.g., fund management fees and other

fund expenses), 12b-1 fees, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. The Adviser, nor investment adviser representatives receive any compensation for the sale of securities or other investment products.

#### **CHARGED PREPAYMENT OF CLIENT FEES**

##### **Advance Payment for Certain Services**

As stated in your agreement with our firm, we may require advance payment under the following engagements:

- Fixed fee of \$2,500 for a financial planning engagement.

Please note that if no service is provided to the client, the unearned fees will be refunded to the client and the client will not be charged during that period.

##### **Termination of Services**

If our Form ADV Part 2 brochure was not delivered to you at least 48 hours prior to entering the investment advisory contract with our firm, then you have the right to terminate the engagement without fee and penalty within five business days after entering into the agreement.

Either party may terminate the agreement at any time by written notice, via email or letter, to the other party. Our firm will not be responsible for future allocations, investment advice or transactional services upon receipt of a termination notice. Upon termination, it will also be necessary that we inform the custodian of record that the relationship between the firm and the client has been terminated.

Should you terminate a financial planning engagement with us after this time, you will be refunded any unearned fees based upon a pro-rated calculation related to the time and expense expended by the firm. The Firm will deliver completed portions of any documents to the clients upon termination.

For portfolio management services engagements, should you terminate the agreement after the five-day period, you will be assessed fees on a prorated basis for services incurred from either (i) as a new client, the date of the engagement to the date of the firm's receipt of the written notice of termination; or (ii) all other accounts, the last billing period to the date of the firm's physical or constructive receipt of written termination notice. As mentioned previously, either party may terminate the agreement at any time by written notice, via email or letter, to the other party.

We will return any unearned advisory fees within 30 days of our receipt of a termination notice. This will only be provided via check from a US-based financial institution; no credits or "transaction reversals" will be issued to an account. The amount of the refunded fee, the formula used to calculate the fee refund, the fee calculation itself, and the time period covered by the fee, will be on the account statement received by the Custodian.

## **Item 6      Performance -Based Fees & Side-by-Side Management**

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### **PERFORMANCE-BASED FEES/SIDE-BY-SIDE MANAGEMENT**

WSG does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client), nor engage in side-by-side management.

## **Item 7      Types of Clients**

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### **TYPES OF CLIENTS**

WSG provides portfolio management services to individuals, corporations and business entities, pensions, charitable institutions, foundations, endowments, estates, trusts, and other U.S. and international institutions.

The Firm generally does not require a minimum initial investment to open an account. However, the Firm reserves the right to accept or decline a potential Client for any reason in its sole discretion. Prior to engaging the Firm to provide any of the investment advisory services described in this Brochure, the Client will be required to enter into one or more written Agreements with the Firm setting forth the terms and conditions under which the Firm shall render its services.

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

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### **METHODS OF ANALYSIS**

Our investment strategy begins with an understanding of a client's financial goals. Advisors use demographic and financial information provided by the client to assess the client's risk profile and investment objectives in determining an appropriate plan for the client's assets. Investment strategies ordinarily include long- or short-term purchases of individual stocks, mutual funds, exchange traded funds, options, and fixed income securities. Frequent trading of securities can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

Investment recommendations are based on an analysis of the client's individual needs and are drawn from research and analysis. Security analysis methods includes the following:

- Fundamental analysis: We attempt to measure the intrinsic value of a security by looking at economic and financial factors to determine if the company is underpriced or overpriced. Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock.
- Technical analysis and charting: The attempt to determine the trend of a security by studying past market data, including price and volume. This presents a potential risk, as the price of a security can change directions at any time and past performance is not a guarantee of future performance.
- Cyclical analysis: We attempt to identify the industry cycle of a company to determine whether the company is in a market introduction phase, growth phase or

maturity phase. Generally projected revenues, growth potential and business risk may fluctuate based on the company's cycle stage.

Information for this analysis is drawn from financial websites and magazines, research materials prepared by others, annual reports, corporate filings, prospectuses, company press releases and corporate ratings services.

It is important to note that investing in securities involves a risk that clients must be prepared to bear. Below are risks with investing in securities:

- **Equity Securities.** The value of the equity securities is subject to market risk, including changes in economic conditions, growth rates, profits, interest rates and the market's perception of these securities. While offering greater potential for long-term growth, equity securities are more volatile and riskier than some other forms of investment.
- **Small- and Medium-Capitalization Stocks.** Small- and medium-capitalization companies may be of a less seasoned nature or have securities that may be traded in the over-the-counter market. These "secondary" securities often involve significantly greater risks than the securities of larger, better-known companies. In addition to being subject to the general market risk that stock prices may decline over short or even extended periods, such companies may not be well-known to the investing public, may not have significant institutional ownership and may have cyclical, static or only moderate growth prospects. Additionally, stocks of such companies may be more volatile in price and have lower trading volumes than larger capitalized companies, which results in greater sensitivity of the market price to individual transactions.
- **OTC Transactions.** In general, there is less governmental regulation and supervision in the OTC markets than of transactions entered into on an organized exchange. In addition, many of the protections afforded to participants on some organized exchanges, such as the performance guarantee of an exchange clearinghouse, will not be available in connection with OTC transactions.
- **Fixed Income Securities Risk** – Fixed income securities include corporate bonds, municipal bonds, other debt instruments and mutual funds that invest in these securities. Prices of fixed income securities generally decline when interest rates rise and rise when interest rates fall. Longer-term debt and zero-coupon bonds are more sensitive to interest rate changes than debt instruments with shorter maturities. Fixed income securities are also subject to *credit risk*, which is the chance that an issuer will fail to pay interest or principal on time
- **Investment Company Risk** – Investment companies include open-end and closed-end investment companies. These investments involve substantially the same risks as investing directly in the underlying instruments; in addition, the return from such an investment will be reduced by the operating expenses and fees of the investment company, including applicable advisory fees.

- **Exchange-Traded Fund Risk** – ETFs are open-end investment companies, unit investment trusts or depository receipts that hold portfolios of stocks, commodities and/or currencies that commonly are designed, before expenses, to closely track the performance and dividend yield of (i) a specific index, (ii) a basket of securities, commodities or currencies, or (iii) a particular commodity or currency. Exchange Traded Funds have the same risks as equity securities noted above.

Our investment approach constantly keeps the risk of loss in mind. These risks include, but are not limited to:

- Interest-rate Risk: Fluctuations in interest rates cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- Market Risk: The price of a security, bond, or mutual fund can drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's underlying circumstances. For example, political, economic, and social conditions may trigger market events.
- Inflation Risk: When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- Reinvestment Risk: This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e., interest rate). This primarily relates to fixed income securities.
- Business Risk: These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- Liquidity Risk: Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- Financial Risk: Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations could result in bankruptcy and/or a declining market value.

## **Item 9      Disciplinary Information**

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WSG is required to disclose whether there are legal or disciplinary events that are material to a client's or prospective client's evaluation of WSG's advisory business or the integrity of its management. None of WSG, its principals, or its employees have been involved in any legal or disciplinary proceedings related to past or present investment advisory clients.

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

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Investment adviser representatives of WSG may also be registered representatives at Securities America, Inc., a registered broker-dealer. WSG is not affiliated with Securities America, Inc., through ownership or control. When applicable, commission-based accounts and variable insurance, are offered through Securities America, Inc. All related compensation is separate from advisory services. If a trade error were to occur, it can result in profit or loss to the firm. The firm has controls in place to limit such trade errors. Investment Advisers may participate in any profits resulting from trade errors only after the Client transaction is corrected and any charges returned to the Client.

This arrangement poses a conflict of interest to the extent that there is a financial incentive to recommend securities and other insurance products that result in commissions, brokerage fees, 12(b)-1 fees or other payments. WSG is dedicated to acting in clients' best interests based on fiduciary principles. Clients are under no obligation to purchase any recommended brokerage products or insurance products.

Clients may purchase securities through broker-dealers in initial public offerings, secondary offerings, and special purpose acquisition company transactions. If Securities America acts as a member of the selling syndicate for such offerings, Securities America will receive compensation equal to a portion of the gross spread (the difference between the price the client pays for the security and the price at which it purchased the securities). The amount of the gross spread is described in the relevant prospectus, offering circular or official statement. Advisors, acting as a Registered Representative of Securities America, receive compensation from the sale of an initial public offering (IPO). The advisory fee is not reduced to offset this compensation. This poses a conflict of interest for those individuals as they have a financial incentive to recommend IPO purchases. However, WSG and its personnel are constrained by fiduciary principles to act in the client's best interest and will only recommend IPO's when they are believed to be suitable.

On average individual Investment Advisor Representatives and the principals of WSG spends less than 5% of their time on other such activities.

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

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### **CODE OF ETHICS**

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

Advisors of WSG may buy or sell securities that are recommended to clients. WSG's employees and persons associated with WSG are required to follow the Code of Ethics.

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

Advisors may recommend and trade in the same securities with clients and/or related accounts at or about the same time. Generally, this would pose a conflict if the Advisor or related account were given a better price than the client. To mitigate this conflict, any trade entered by an Advisor alongside a client trade will be reviewed to ensure the client got the same price or better than the Advisor.

Trades may be done on an aggregated basis when consistent with WSG's obligation of best execution. In such circumstances, the Advisor (or related account) and client accounts will share commission costs equally and receive securities at a total average price. WSG will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. Completed orders will be allocated as specified in the initial trade order. Partially filled orders will be allocated on a pro rata basis. Any exceptions will be explained on the order. The Adviser does not recommend to clients, or buys or sells for client accounts, securities in which the Adviser or a related person has a material financial interest.

WSG's clients or prospective clients may request a copy of WSG's Code of Ethics by contacting the Compliance Department at our main number.

## **Item 12     Brokerage Practices**

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### **SELECTION AND RECOMMENDATION**

We recommend the brokerage and custodial services of National Financial Services, LLC. It offers products and services that benefits WSG but may not directly benefit WSG's Clients' Accounts. Those products and services are used to service most WSG accounts and include software and other technology that (i) provides access to Client Account data (such as trade confirmations and Account statements); (ii) facilitates trade execution and allocates aggregated trade orders for multiple Client Accounts; (iii) provides research, pricing, and other market data; (iv) facilitates payment of WSG's quarterly fees from its Clients' Accounts; and (v) assists with back-office functions, recordkeeping, and reporting. The Custodian is a registered broker- dealer and does not generally charge separately for custody services but is compensated by account holders through commissions and other transaction-related or asset-based fees for securities trades that are executed. When



selecting a custodian to recommend, several factors were considered, including their financial strength, reputation, execution capabilities, pricing and services offered. While we consider transaction costs to be reasonable in relation to the value of the brokerage and other services rendered, transaction fees may be higher or lower than fees charged by other broker-dealers. In return for effecting securities transactions through National Financial Services, LLC, WSG receives products and services that help us make investment decisions and service our clients' accounts. These products and services are known as "soft dollar benefits." If National Financial Services, LLC did not provide us with soft dollar benefits, we would have to pay for these products and services.

Clients can benefit when we aggregate trades to obtain volume discounts on execution costs. Trade aggregation refers to the practice of combining orders for execution. When consistent with our duty to obtain best execution, we will aggregate multiple client transactions into a single order in order to obtain the best price for our clients. In such circumstances, the accounts will share commission costs equally and receive securities at a total average price. WSG will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. Completed orders will be allocated as specified in the initial trade order. Partially filled orders will be allocated on a pro rata basis. Any exceptions will be explained on the order. If cash is swept into a money market fund, WSG may receive compensation based on the value of money market fund assets. Thus, WSG may have an incentive to recommend that Clients select money market funds as a sweep vehicle.

#### **SOFT DOLLAR BENEFITS**

Section 28(e) of the Securities Exchange Act of 1934 (the "Exchange Act") provides a safe harbor that permits advisers, when selecting brokers to execute transactions for client accounts, to consider certain research products and services provided to the adviser by brokers. Clients may pay higher commissions than are obtainable from other brokers as a result of the consideration of research services as a factor in selecting brokers in addition to commission cost and best execution, provided that WSG determines in good faith that the amount of commissions charged is reasonable in relation to the value of the brokerage and research services provided by such broker.

In return for effecting securities transactions through and National Financial Services, LLC, WSG receives products and services that help us make investment decisions and service our clients' accounts. These products and services are known as "soft dollar benefits." If and National Financial Services, LLC did not provide us with soft dollar benefits, we would have to pay for these products and services.

Research services provided to WSG may include written information and analyses concerning specific securities, companies, or sectors; market, financial and economic studies, and forecasts; statistics and pricing services; software and databases, and discussions with research personnel. WSG may at its discretion pay expenses and costs of third-party administrators with soft dollar arrangements. However, consistent with obtaining best execution for clients, WSG may in the future engage in such soft dollar arrangements, provided that such arrangements are of the type described in Section 28(e)

of the Exchange Act and are designed to augment WSG's own internal research and investment strategy capabilities.

Receipt of research services from National Financial Services, LLC may provide WSG with a benefit because it will not have to produce or pay for the research, products, or services. WSG may have an incentive to select a broker-dealer based on its interest in receiving the research or other products or services, rather than on a client's interest in receiving most favorable execution.

Research services obtained with the use of commissions arising from portfolio transactions may be used by WSG in its investment activities for all its clients, and, therefore, any client may or may not, in any particular instance, be the direct or indirect beneficiary of the research or services provided.

Subject to the considerations described above, the selection of a broker, including a prime broker, to execute transactions, provide financing and securities on loan, hold cash and short balances and provide other services may be influenced by, among other things, the provision by the broker of the following: capital introduction, marketing assistance and consulting services with respect to technology, operations, commitment of capital, access to company management, and access to deal flow. Generally, neither WSG nor any client of WSG separately compensates any broker for any of these other services.

#### **BROKERAGE FOR CLIENT REFERRALS**

We do not routinely request or require that clients direct us to execute transactions through a specified broker-dealer. The Firm only uses National Financial Services, LLC, as our broker/dealer. The Adviser, nor any related persons receive client referrals from a broker/dealer or Custodian.

#### **DIRECTED BROKERAGE**

WSG does not have any other arrangements with clients that require WSG to execute transactions through a specified broker-dealer.

#### **ORDER AGGREGATION**

Trade aggregation refers to the practice of combining orders for execution. When consistent with our duty to obtain best execution, we will aggregate multiple client transactions into a single order in order to obtain the best price for our clients. In such circumstances, the accounts will share commission costs equally and receive securities at a total average price.

Orders may be combined for all such accounts, and if any order is not filled at the same price, they may be allocated on an average price basis. Similarly, if an order on behalf of more than one account cannot be fully executed under prevailing market conditions, securities may be allocated among the different accounts on a basis which WSG or its affiliates considers equitable. WSG will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order.

## **Item 13      Review of Accounts**

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Trade records and transaction details are reviewed daily to ensure that all trading activity is performed in accordance with the investment parameters as defined in the client's investment management agreement. Daily reconciliations of all trading activity as well as cash, collateral, and margin management (if applicable) also occur.

Account performance is reviewed no less than annually. Factors that are considered during such reviews include but are not limited to the following: investment objectives, targeted allocation, current allocation, suitability, performance, monthly distributions, concentrated positions, diversification, and outside holdings. Examples of situations that may impact Client's account would be the following: performance that is not in line with the client's "downside risk tolerance," change in investment objective, the client makes a significant addition of capital or withdrawal of capital from the account, rebalancing of the portfolio if current allocation and targeted allocation are not consistent, concentrated position that could lead to volatility, etc.

Clients are reminded to inform WSG in writing of any material changes to the information included in the questionnaire or any other change in the client's financial circumstances that might affect the way client's assets should be invested. Clients may contact WSG during normal business hours to consult with the firm concerning the management of the client's account(s). All managed accounts are delivered quarterly performance reports.

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

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### **ECONOMIC BENEFITS FROM OTHERS**

WSG and its related persons do not receive an economic benefit (such as sales awards or other prizes) from any third party for providing investment advice or other advisory services to its clients. However, WSG does receive "soft dollar" benefits as described in Item 12.

Currently, neither WSG nor its related persons compensate directly or indirectly any person who is not a supervised person for client referrals. The Firm does not receive any compensation for client referrals to third party investment advisers.

## **Item 15 Custody**

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### **CUSTODY OF ASSETS**

WSG has constructive custody of client funds and securities due to the ability to deduct advisory fees from accounts. In accordance with custody rules, WSG will ensure that a qualified custodian maintains the account and that clients receive a quarterly account statement from the qualified custodian.

You will receive account statements directly from National Financial Services, LLC at least quarterly. You should carefully review those statements promptly and compare them to the invoices you receive from us and notify us of any discrepancies.

Your assets are not held by our firm or any associate or our firm. In keeping with this policy involving our client funds or securities, WSG:

- Restricts the firm or an associate from serving as trustee or having general power of attorney over a client account.
- Prohibits any associate from having authority to directly withdraw securities or cash assets from a client account. Although we may be deemed to have “constructive custody” of your assets since we may request the withdrawal of advisory fees from an account, we will only do so through the engagement of a qualified custodian maintaining your account assets, via your prior written authorization, and following our written invoice;
- The written authorization to deduct advisory fees by the Custodian is called a standing letter of authorization. Clients can establish standing letter of instructions with National Financial Services, LLC to grant the Adviser the power to disburse funds to accounts as specifically designated by the client.
- Does not accept or forward client securities (i.e., stock certificates) erroneously delivered to our firm, will not collect advance fees of \$2500 or more for services that are to be performed six months or more into the future; and
- Will not authorize an associate to have knowledge of a client’s account access information (i.e., online 401(k), brokerage or bank accounts) if such access would allow physical control over account assets.

The custodian of record will provide the client with the account transaction confirmations and statements, which will include all debits and credits, as well as reference to our firm’s advisory fee for that period. Statements are provided on at least a quarterly basis and confirmations are provided as transactions occur within the client account. WSG will not create an account statement for a client or serve as the sole recipient of an account statement. Should a client receive a report and invoices from our advisory firm that includes investment performance information, they are urged to carefully review and compare their account statements that they have received directly from their custodian of record with any performance report from our firm.

## **Item 16 Investment Discretion**

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WSG provides investment advisory services to Client Accounts on a discretionary basis. Such discretion is granted at the outset of the advisory relationship and must be in writing. If discretionary authority is granted to select the identity and number of securities to be

bought or sold, clients must authorize such discretion in writing in the advisory agreement. In all cases, such discretion is to be exercised in a manner consistent with the stated investment objectives for the client account. When selecting securities and determining amounts, WSG observes the investment policies, limitations, and restrictions of the clients for which it advises. Investment guidelines and restrictions must be provided to WSG in writing. Pursuant to the Client's instructions, a client's cash may be invested in a money market mutual fund managed by the Account's Custodian, which charges a fee. Clients should contact their Custodian for more information about this investment of their cash.

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## **Item 17     Voting Client Securities**

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As a matter of firm policy and practice, WSG does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for all securities maintained in client portfolios. Clients should contact their investment advisor, or the Firm at (714) 384-4144 if they have any questions and/or to obtain this information. Clients will receive their proxies directly from their custodian or transfer agent.

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## **Item 18     Financial Information**

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### **BALANCE SHEET REQUIREMENT**

WSG does not have any financial commitments that impair its ability to meet contractual and fiduciary obligations to Clients and has not been the subject of a bankruptcy proceeding.

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## **Item 20     Privacy Policy**

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Wealth Strategies Group does not disclose nonpublic personal information about its clients or former clients to third parties other than as described below. WSG collects information about its clients (such as name, address, social security number, assets, and income) from the Firm's discussions with clients, from documents that clients may deliver to the Firm and while providing services to clients. To service clients' accounts and effect investment transactions, WSG may provide clients' personal information firms that assist WSG in servicing client accounts and have a need for such information, such as brokers, distributors, legal counsel, or our custodian. WSG does not otherwise provide information about clients to outside firms, organizations, or individuals except as required or permitted by law. Any party that receives this information will use it only for the services required and as allowed by applicable law or regulation and is not permitted to share or use this information for any other purpose.

### **"Opting-out" of Third-Party Disclosures**

If you do not want your Investment Advisor to retain copies of your Client-specific information if he leaves us to join another firm, you may notify our Compliance Department by calling (714) 384-4144.



## **Brochure Supplement**

**(Part 2B of Form ADV)**

**TRAVIS ALLEN**

**Investment Adviser Representative**

**Wealth Strategies Group  
17011 Beach Blvd, Ste 150  
Huntington Beach, CA 92647**

**Telephone: (714) 384-4144**

**Email: [travis@wealthstrategiesgroup.com](mailto:travis@wealthstrategiesgroup.com)**

NOTICE: The attached Brochure Supplement provides information about the Investment Adviser Representative of Wealth Strategies Group ("WSG" or the "**Firm**"). You should have received a copy of the Brochure for Wealth Strategies Group, CRD No. 316461, as well. Please contact Travis Allen, Chief Compliance Officer, if you did not receive the Firm's Part 2A of Form ADV. You can also contact Travis Allen if you have any questions about the content of the attached supplement.

Additional information about the Firm's investment adviser representatives is available on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by a unique identifying number known as a CRD number. Travis Allen's CRD number is 2708820.

March 31, 2022

## **General Requirements**

Generally, Wealth Strategies Group requires employees to hold a college or advanced degree or have relevant working experience in the securities or investment advisory industry. Any employee of WSG acting in a representative capacity will be appropriately licensed or registered.

### **Item 2 Education and Business Experience**

CRD Number: 2708820

Year of Birth: 1973

California State University (1996) BA in Economics

CERTIFIED FINANCIAL PLANNER™ (CFP®) October 2006

#### **RELATED BUSINESS EXPERIENCE:**

**CEO/President** (2001 - Present)

Wealth Strategies Group, Inc.

#### **Investment Adviser Representative**

Securities America Advisors, Inc. (2007 - Present)

#### **Registered Representative**

Securities America, Inc. (2007 – Present)

The CERTIFIED FINANCIAL PLANNER™ (CFP®) designation is issued by the Certified Financial Planner Board of Standards, Inc. Candidates are required to complete a CFP-board registered program. They must also pass the CFP Certification Examination, which is administered in 10 hours over a two-day period. The exam includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances. Certified individuals are required to complete 30 hours of continuing education every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct. As a prerequisite to sitting for the CFP Certification Examination, candidates must hold a bachelor's degree (or higher) from an accredited college or university and have at least 3 years of full time personal financial planning experience.

### **Item 3 Disciplinary Information**

Travis Allen does not have any legal or disciplinary events material to a client's or prospective client's evaluation.

### **Item 4 Other Business Activities**

Mr. Allen offers insurance and insurance products as an insurance agent through insurance companies. He is compensated through commissions and trails based on the sale of insurance products. This may pose a conflict of interest to the extent that he has a financial

incentive to recommend insurance products that may result in additional commissions, or other payments. However, Mr. Allen is constrained by fiduciary principles to act in his client's best interest. Mr. Allen spends approximately one (1) hour per week dedicated to insurance and insurance sales. Conflicts of interest may arise in the course of providing investment advisory services to you and Mr. Allen's insurance activities. These potential conflicts of interest are described in this brochure. To the extent we are unable to prevent actual or potential conflicts, we will take reasonable steps to mitigate them and at a minimum, disclose them to you. You are under no obligation to purchase insurance products through Mr. Allen, and may purchase insurance products at other providers at a lower cost.

Your financial advisor may recommend the purchase and sale of securities products in their separate capacity as a registered representative with Securities America, Inc., a full-service broker/dealer, member FINRA/SIPC. Securities America, Inc. and Wealth Strategies Group are non-affiliated entities. A portion of the financial advisor's time each week is dedicated to securities and securities sales. Your financial advisor may receive commissions when offering securities products to clients. This may pose a conflict of to the extent that he has a financial incentive to recommend securities and other investments that may result in commissions, brokerage fees or other payments. However, Mr. Allen is constrained by fiduciary principles to act in his client's best interest. Clients are under no obligation to purchase recommended securities products.

#### **Item 5            Additional Compensation**

Travis Allen only receives compensation for advisory services paid by clients, in addition to insurance and commissions from his outside business activities, which is described above in Item 4.

#### **Item 6            Supervision**

Travis Allen is the sole Manager of Wealth Strategies Group. Wealth Strategies Group provides investment advisory and supervisory services in accordance with its policies and procedures manual. The Firm's Chief Compliance Officer, Travis Allen, is primarily responsible for the implementation and day-to-day oversight of the Firm's business practices ensuring compliance with the Firm's policies and procedures.