# FORM ADV PART 2A DISCLOSURE BROCHURE



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This brochure provides information about the qualifications and business practices of Stagner Financial Advisory Group, LLC. Being registered as a registered investment adviser does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us at 855-285-0316 or ray@stagnerfinancial.com The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission, or by any state securities authority.

Additional information about Stagner Financial Advisory Group, LLC (IARD#284305) is available on the SEC's website at www.adviserinfo.sec.gov

SEPTEMBER 20, 2023

# **Item 2: Material Changes**

# **Annual Update**

The Material Changes section of this brochure will be updated annually or when material changes occur since the previous release of the Firm Brochure.

# **Material Changes since the Last Update**

Since the last update on February 23, 2023, the following changes have occurred:

- Item 4 to update the assets under management for the firm.
- Item 12 custodian information has been updated.

## **Full Brochure Available**

This Firm Brochure being delivered is the complete brochure for the Firm.

# **Item 3: Table of Contents**

# Form ADV - Part 2A - Firm Brochure

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## **Item 4: Advisory Business**

## **Firm Description**

Stagner Financial Advisory Group, LLC dba Stagner Financial Advisory ("SFA"), an Oklahoma limited liability company, is a registered investment advisory firm founded in 2009 and began offering advisory services in 2016. The firm is owned and managed by William R. "Ray" Stagner.

SFA is an investment management firm. The firm does not act as a custodian of Client assets.

An evaluation of each Client's initial situation is provided to the Client, often in the form of a net worth statement, risk analysis or similar document. Periodic reviews are also communicated to provide reminders of the specific courses of action that need to be taken. More frequent reviews occur but are not necessarily communicated to the Client unless immediate changes are recommended.

# **Types of Advisory Services**

#### ASSET MANAGEMENT

SFA offers discretionary direct asset management services to advisory Clients. SFA will offer Clients ongoing portfolio management services through determining individual investment goals, time horizons, objectives, and risk tolerance. Investment strategies, investment selection, asset allocation, portfolio monitoring and the overall investment program will be based on the above factors. When the Client provides SFA discretionary authority the Client will sign a limited trading authorization or equivalent. SFA will have the authority to execute transactions in the account without seeking Client approval on each transaction.

## **ERISA PLAN SERVICES**

SFA provides service to qualified retirement plans including 401(k) plans, 403(b) plans, pension and profit-sharing plans, cash balance plans, and deferred compensation plans. SFA may act as either a 3(21) advisor:

<u>Limited Scope ERISA 3(21) Fiduciary.</u> SFA may serve as a limited scope ERISA 3(21) fiduciary that can advise, help and assist plan sponsors with their investment decisions on a non-discretionary basis. As an investment advisor SFA has a fiduciary duty to act in the best interest of the Client. The plan sponsor is still ultimately responsible for the decisions made in their plan, though using SFA can help the plan sponsor delegate liability by following a diligent process.

## 1. Fiduciary Services are:

- Provide non-discretionary investment advice to the Client about asset classes and investment alternatives available for the Plan in accordance with the Plan's investment policies and objectives. Client will make the final decision regarding the initial selection, retention, removal and addition of investment options. SFA acknowledges that it is a fiduciary as defined in ERISA section 3 (21) (A) (ii).
- Assist the Client in the development of an investment policy statement ("IPS"). The IPS establishes the investment policies and objectives for the Plan. Client shall have the ultimate responsibility and authority to establish such policies and objectives and to adopt and amend the IPS.
- Provide non-discretionary investment advice to the Plan Sponsor with respect to the selection of a qualified default investment alternative for participants who are automatically enrolled in the Plan or who have otherwise failed to make investment elections. The Client retains the sole responsibility to provide all notices to the Plan participants required under ERISA Section 404(c) (5) and 404(a)-5.

- Assist in monitoring investment options by preparing periodic investment reports that
  document investment performance, consistency of fund management and conformance to the
  guidelines set forth in the IPS and make recommendations to maintain, remove or replace
  investment options.
- Meet with Client on a periodic basis to discuss the reports and the investment recommendations.

# 2. Non-fiduciary Services are:

- Assist in the education of Plan participants about general investment information and the
  investment alternatives available to them under the Plan. Client understands SFA's assistance
  in education of the Plan participants shall be consistent with and within the scope of the
  Department of Labor's definition of investment education (Department of Labor Interpretive
  Bulletin 96-1). As such, SFA is not providing fiduciary advice as defined by ERISA 3(21)(A)(ii)
  to the Plan participants. Advisor will not provide investment advice concerning the prudence
  of any investment option or combination of investment options for a particular participant or
  beneficiary under the Plan.
- Assist in the group enrollment meetings designed to increase retirement plan participation among the employees and investment and financial understanding by the employees.

SFA may provide these services or, alternatively, may arrange for the Plan's other providers to offer these services, as agreed upon between Advisor and Client.

- 3. SFA has no responsibility to provide services related to the following types of assets ("Excluded Assets"):
  - Employer securities;
  - Real estate (except for real estate funds or publicly traded REITs);
  - Stock brokerage accounts or mutual fund windows;
  - Participant loans;
  - Non-publicly traded partnership interests;
  - Other non-publicly traded securities or property (other than collective trusts and similar vehicles); or
  - Other hard-to-value or illiquid securities or property.

Excluded Assets will **not** be included in calculation of Fees paid to SFA on the ERISA Agreement. Specific services will be outlined in detail to each plan in the 408(b)2 disclosure.

# **Client Tailored Services and Client Imposed Restrictions**

The goals and objectives for each Client are documented in our Client files. Investment strategies are created that reflect the stated goals and objectives.

Agreements may not be assigned without written Client consent.

# Wrap Fee Programs

SFA does not sponsor a wrap fee program.

# **Client Assets Under Management**

SFA has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$43,040,000	\$0	September 12, 2023

## **Item 5: Fees and Compensation**

# **Method of Compensation and Fee Schedule**

#### ASSET MANAGEMENT

SFA offers discretionary direct asset management services to advisory Clients. SFA charges an annual investment advisory fee based on the total assets under management as follows:

Assets Under Management	Annual Fee	Quarterly Fee
\$50,000 - \$499,999	1.85%	.4625%
\$500,000 - \$749,999	1.50%	.3750%
\$750,000 - \$999,999	1.25%	.3125%
\$1,000,000 and Above	1.10%	.2750%

This is a tiered or breakpoint fee schedule, typically the entire portfolio is charged the same asset management fee. However, negotiated lower rates may be available for those types of accounts that require less active management and intervention; hereby, known as a passively managed account. An example of the type of account that may require less active management and intervention would be accounts primarily containing bonds, CD's and treasury notes. Whereas, actively managed accounts are actively monitored and adjusted based upon market conditions.

For example, a Client with two types of accounts (actively managed and passively managed) might pay the following:

Actively managed account has \$750,000 under management, Client would pay \$9,375. \$750,000  $\times 1.25\% = \$9.375$ .

Passively managed account has \$750,000 under management, Client would pay 5,625 on an annual basis.  $750,000 \times .75\% = 5,625$ .

For a total fee of \$15,000.

The annual fee may be negotiable based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with Clients, etc.).

Fees are billed quarterly in advance based on the amount of assets managed as of the close of business on the last business day of the previous quarter. Lower fees for comparable services may be available from other sources. Clients may terminate their account within five (5) business days of signing the Investment Advisory Agreement with no obligation and without penalty. Clients may terminate advisory services with thirty (30) days written notice. For accounts opened or closed mid-billing period, fees will be prorated based on the days services are provided during the given period. All unpaid earned fees will be due to SFA. Additionally, all unearned fees will be refunded to the Client. Client shall be given thirty (30) days prior written notice of any increase in fees. Any increase in fees will be acknowledged in writing by both parties before any increase in said fees occurs.

If SFA is authorized or permitted to deduct fees directly from the account by the custodian:

- SFA will provide the Client with an invoice concurrent to instructing the custodian to deduct the fee stating the amount of the fee, the formula used to calculate the fee, the amount of assets under management the fee is based on and the time period covered by the fee;
- SFA will obtain written authorization signed by the Client allowing the fees to be deducted; and

• The Client will receive quarterly statements directly from the custodian which disclose the fees deducted.

#### **ERISA PLAN SERVICES**

The annual fees are based on the market value of the Included Assets and will not exceed 1%. The annual fee is negotiable and may be charged as a percentage of the Included Assets or as a flat fee. Fees may be charged quarterly or monthly in arrears or in advance based on the assets as calculated by the custodian or record keeper of the Included Assets (without adjustments for anticipated withdrawals by Plan participants or other anticipated or scheduled transfers or distribution of assets). If the services to be provided start any time other than the first day of a quarter or month, the fee will be prorated based on the number of days remaining in the quarter or month. If this Agreement is terminated prior to the end of the billing cycle, SFA shall be entitled to a prorated fee based on the number of days during the fee period services were provided or Client will be due a prorated refund of fees for days services were not provided in the billing cycle.

The fee schedule, which includes compensation of SFA for the services is described in detail in Schedule A of the ERISA Plan Agreement. The Plan is obligated to pay the fees; however, the Plan Sponsor may elect to pay the fees. Client may elect to be billed directly or have fees deducted from Plan Assets. SFA does not reasonably expect to receive any additional compensation, directly or indirectly, for its services under this Agreement. If additional compensation is received, SFA will disclose this compensation, the services rendered, and the payer of compensation. SFA will offset the compensation against the fees agreed upon under the Agreement.

# **Client Payment of Fees**

Investment management fees are billed quarterly in advance, meaning we bill you before the three-month period has started. Fees are usually deducted from a designated Client account to facilitate billing. The Client must consent in advance to direct debiting of their investment account.

#### Additional Client Fees Charged

Custodians may charge transaction fees on purchases or sales of certain mutual funds, equities, and exchange-traded funds. These charges may include Mutual Fund transactions fees, postage and handling and miscellaneous fees (fee levied to recover costs associated with fees assessed by self-regulatory organizations).

The annual fee may be negotiable based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with Clients, etc.).

For more details on the brokerage practices, see Item 12 of this brochure.

## **Prepayment of Client Fees**

Investment management fees are billed quarterly in advance.

Fees for ERISA 3(21) services may be billed in advance.

If the Client cancels after five (5) days, any unearned fees will be refunded to the Client, or any unpaid earned fees will be due to SFA.

# **External Compensation for the Sale of Securities to Clients**

SFA foes not receive any external compensation for the sale of securities to Clients, nor do any of the investment advisor representatives of SFA.

# Item 6: Performance-Based Fees and Side-by-Side Management

# **Sharing of Capital Gains**

Fees are <u>not</u> based on a share of the capital gains or capital appreciation of managed securities.

SFA does not use a performance-based fee structure because of the conflict of interest. Performance based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the Client.

# **Item 7: Types of Clients**

# **Description**

SFA generally provides investment advice to individuals and high net worth individuals. Client relationships vary in scope and length of service.

# **Account Minimums**

SFA requires a minimum of \$50,000 to open an account, but reserves the right to accept accounts at a lower minimum.

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

#### **Methods of Analysis**

Security analysis methods may include fundamental analysis, technical analysis and cyclical analysis. Investing in securities involves risk of loss that Clients should be prepared to bear. Past performance is not a guarantee of future returns.

Fundamental analysis involves evaluating a stock using real data such as company revenues, earnings, return on equity, and profit margins to determine underlying value and potential growth. Technical analysis involves evaluating securities based on past prices and volume. Cyclical analysis involves analyzing the cycles of the market.

The main sources of information include financial newspapers and magazines, annual reports, prospectuses, and filings with the Securities and Exchange Commission.

# **Investment Strategy**

The investment strategy for a specific Client is based upon the objectives stated by the Client during consultations. The Client may change these objectives at any time. Each Client executes an Investment Policy Statement or Risk Tolerance that documents their objectives and their desired investment strategy.

#### **Security Specific Material Risks**

All investment programs have certain risks that are borne by the investor. Fundamental analysis may involve interest rate risk, market risk, business risk, and financial risk. Risks involved in technical analysis are inflation risk, reinvestment risk, and market risk. Cyclical analysis involves inflation risk, market risk, and currency risk.

Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks and should discuss these risks with SFA.

- *Interest-rate Risk*: Fluctuations in interest rates may 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 may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external

- factors independent of a security's particular 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 buy more than a dollar next year, because purchasing power is eroding at the rate of inflation.
- *Currency Risk*: Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- *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 may result in bankruptcy and/or a declining market value.

# **Item 9: Disciplinary Information**

#### **Criminal or Civil Actions**

The firm and its management have not been involved in any criminal or civil action.

## **Administrative Enforcement Proceedings**

The firm and its management have not been involved in administrative enforcement proceedings.

# **Self- Regulatory Organization Enforcement Proceedings**

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

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

## **Broker-Dealer or Representative Registration**

SFA is not registered as a broker-dealer and no affiliated representatives of SFA are registered representatives of a broker-dealer.

# **Futures or Commodity Registration**

Neither SFA nor its employees are registered or has an application pending to register as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

# Material Relationships Maintained by this Advisory Business and Conflicts of Interest

Investment Advisor Representatives of SFA are also licensed insurance agents. Approximately 20% to 60% of their time is spent in this practice. From time to time, they will offer Clients services from this activity.

This represents a conflict of interest because it gives an incentive to recommend products and services based on the commission and/or fee amount received. This conflict is mitigated by disclosures, procedures, and the firm's fiduciary obligation to place the best interest of the Client first and the Clients are not required to purchase any products or services. Clients have the option to purchase these products or services through another insurance agent of their choosing.

# Recommendations or Selections of Other Investment Advisors and Conflicts of Interest

SFA does not utilize the services of third-party money managers to manage Client accounts.

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

# **Code of Ethics Description**

The employees of SFA have committed to a Code of Ethics ("Code"). The purpose of our Code is to set forth standards of conduct expected of SFA employees and addresses conflicts that may arise. The Code defines acceptable behavior for employees of SFA. The Code reflects SFA and its supervised persons' responsibility to act in the best interest of their Client.

One area which the Code addresses is when employees buy or sell securities for their personal accounts and how to mitigate any conflict of interest with our Clients. We do not allow any employees to use non-public material information for their personal profit or to use internal research for their personal benefit in conflict with the benefit to our Clients.

SFA's policy prohibits any person from acting upon or otherwise misusing non-public or inside information. No advisory representative or other employee, officer or director of SFA may recommend any transaction in a security or its derivative to advisory Clients or engage in personal securities transactions for a security or its derivatives if the advisory representative possesses material, non-public information regarding the security.

SFA's Code is based on the guiding principle that the interests of the Client are the top priority. SFA's officers, directors, advisors, and other employees have a fiduciary duty to the Clients and must diligently perform that duty to maintain the trust and confidence of the Clients. When a conflict arises, it is SFA's obligation to put the Client's interests over the interests of either employees or the company.

The Code applies to "access" persons. "Access" persons are employees who have access to non-public information regarding any Clients' purchase or sale of securities, or non-public information regarding the portfolio holdings of any reportable fund, who are involved in making securities recommendations to Clients, or who have access to such recommendations that are non-public.

The firm will provide a copy of the Code of Ethics to any Client or prospective Client upon request.

# Investment Recommendations Involving a Material Financial Interest and Conflict of Interest

SFA and its employees do not recommend to Clients securities in which we have a material financial interest.

# Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest

SFA and its employees may buy or sell securities that are also held by Clients. In order to mitigate conflicts of interest such as front running, employees are required to disclose all reportable securities transactions as well as provide SFA with copies of their brokerage statements.

The Chief Compliance Officer of SFA is Tracy Stagner. She reviews all employee trades monthly. The personal trading reviews ensure that the personal trading of employees does not affect the markets and that Clients of the firm receive preferential treatment over employee transactions.

# Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest

SFA does not maintain a firm proprietary trading account and does not have a material financial interest in any securities being recommended and therefore no conflicts of interest exist. However, employees may buy or sell securities at the same time they buy or sell securities for Clients. In order to mitigate conflicts of interest such as front running, employees are required to disclose all reportable securities transactions as well as provide SFA with copies of their brokerage statements.

# **Item 12: Brokerage Practices**

## **Factors Used to Select Broker-Dealers for Client Transactions**

SFA will recommend the use of a particular broker-dealer based on their duty to seek best execution for the client, meaning they have an obligation to obtain the most favorable terms for a client under the circumstances. The determination of what may constitute best execution and price in the execution of a securities transaction by a broker involves a number of considerations and is subjective. Factors affecting brokerage selection include the overall direct net economic result to the portfolios, the efficiency with which the transaction is affected, the ability to effect the transaction where a large block is involved, the operational facilities of the broker-dealer, the value of an ongoing relationship with such broker and the financial strength and stability of the broker. SFA will select appropriate brokers based on a number of factors including but not limited to their relatively low transaction fees and reporting ability. SFA relies on its broker to provide its execution services at the best prices available. Lower fees for comparable services may be available from other sources. Clients pay for any and all custodial fees in addition to the advisory fee charged by SFA. SFA does not receive any portion of the trading fees.

SFA will recommend the use of Charles Schwab.

# • Directed Brokerage

In circumstances where a Client directs SFA to use a certain broker-dealer, SFA still has a fiduciary duty to its Clients. The following may apply with Directed Brokerage: SFA's inability to negotiate commissions, to obtain volume discounts, there may be a disparity in commission charges among Clients and conflicts of interest arising from brokerage firm referrals.

#### • Best Execution

Investment advisors who manage or supervise Client portfolios on a discretionary basis have a fiduciary obligation of best execution. The determination of what may constitute best execution and price in the execution of a securities transaction by a broker involves a number of considerations and is subjective. Factors affecting brokerage selection include the overall direct net economic result to the portfolios, the efficiency with which the transaction is effected, the ability to effect the transaction where a large block is involved, the operational facilities of the broker-dealer, the value of an ongoing relationship with

such broker and the financial strength and stability of the broker. The firm does not receive any portion of the trading fees.

• Soft Dollar Arrangements
SFA has no soft dollar arrangements.

# **Aggregating Securities Transactions for Client Accounts**

SFA maintains the ability to block trade purchases across accounts. While block trading may benefit Clients by purchasing larger blocks in groups, we do not feel that the Clients are at a disadvantage due to the best execution practices of our custodian.

#### Item 13: Review of Accounts

# Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons Involved

Account reviews are performed quarterly by Investment Advisor Representatives of SFA. Account reviews are performed more frequently when market conditions dictate.

#### Review of Client Accounts on Non-Periodic Basis

Other conditions that may trigger a review of Clients' accounts are changes in the tax laws, new investment information, and changes in a Client's own situation.

# **Content of Client Provided Reports and Frequency**

Clients receive written account statements no less than quarterly for managed accounts. Account statements are issued by SFA's custodian. Client receives confirmations of each transaction in account from Custodian and an additional statement during any month in which a transaction occurs. SFA provides performance reports to Clients annually or more frequently if necessary.

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

# **Economic benefits provided to the Advisory Firm from External Sources and Conflicts of Interest**

SFA does not receive any economic benefits from external sources.

# **Advisory Firm Payments for Client Referrals**

SFA does not compensate for Client referrals.

## **Item 15: Custody**

#### **Account Statements**

All assets are held at qualified custodians, which means the custodians provide account statements directly to Clients at their address of record at least quarterly. SFA is deemed to have constructive custody solely because advisory fees are directly deducted from Client's account by the custodian on behalf of SFA.

## **Item 16: Investment Discretion**

#### **Discretionary Authority for Trading**

SFA requires discretionary authority to manage securities accounts on behalf of Clients. SFA has the authority to determine, without obtaining specific Client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. However, SFA consults with the

Client prior to each trade to obtain concurrence if a blanket trading authorization has not been given.

The Client approves the custodian to be used and the commission rates paid to the custodian. SFA does not receive any portion of the transaction fees or commissions paid by the Client to the custodian on certain trades.

## **Item 17: Voting Client Securities**

#### **Proxy Votes**

SFA does not vote proxies on securities. Clients are expected to vote their own proxies. The Client will receive their proxies directly from the custodian of their account or from a transfer agent.

When assistance on voting proxies is requested, SFA will provide recommendations to the Client. If a conflict of interest exists, it will be disclosed to the Client.

#### **Item 18: Financial Information**

## **Balance Sheet**

A balance sheet is not required to be provided because SFA does not serve as a custodian for Client funds or securities and SFA does not require prepayment of fees of more than \$500 per Client and six (6) months or more in advance.

# Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients

SFA has no condition that is reasonably likely to impair our ability to meet contractual commitments to our Clients.

# **Bankruptcy Petitions during the Past Ten Years**

Neither SFA nor its management has had any bankruptcy petitions in the last ten years.

## **Item 19: Requirements for State Registered Advisors**

# **Principal Executive Officers and Management Persons**

The education and business background for all management and supervised persons can be found in the Part 2B of this Brochure.

#### **Outside Business Activities**

The outside business activities for all management and supervised persons can be found in the Part 2B of this Brochure.

## **Performance Based Fee Description**

SFA does not receive any performance-based fees.

# Disclosure of Material Facts Related to Arbitration or Disciplinary Actions Involving Management Persons

No management persons of SFA have any disclosures to report.

# Material Relationship Maintained by this Advisory Business or Management persons with Issuers of Securities

There are no material relationships with issuers of securities to disclose.

Item 1 Cover Page

# SUPERVISED PERSON BROCHURE

FORM ADV PART 2B

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This brochure supplement provides information about William R. Stagner and supplements the Stagner Financial Advisory Group, LLC's brochure. You should have received a copy of that brochure. Please contact Ray Stagner if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about Ray Stagner (CRD#4693679) is available on the SEC's website at <a href="https://www.adviserinfo.sec.gov">www.adviserinfo.sec.gov</a>.

SEPTEMBER 20, 2023

# **Brochure Supplement (Part 2B of Form ADV) Supervised Person Brochure**

## **Principal Executive Officer**

# William "Ray" Stagner, ChFC®, CLU®

• Year of birth: 1972

# Item 2 Educational Background and Business Experience

**Educational Background:** 

• Northeastern State University; Bachelor Degree in Business Administration; 1997

## **Business Experience:**

- Stagner Financial Advisory Group, LLC dba Stagner Financial Advisory; Managing Member; 06/2016 Present
- Stagner Financial Advisory Group, LLC dba Stagner Financial Advisory; Chief Compliance Officer; 06/2016 06/2019
- Stagner Financial Advisory Group; Representative; 07/2014 Present
- Sole Proprietor; Insurance Agent; 01/2003 Present
- Private Client Services, LLC; Registered Representative; 08/2016 02/2018
- Legacy Advance Solutions LLC; Managing Member/Chief Compliance Officer; 08/2016 04/2017
- VSR Advisory Services; Investment Advisor Representative; 07/2014 08/2016
- VSR Financial Services, Inc.; Registered Representative; 07/2014 08/2016

#### **Professional Certifications**

Employees have earned certifications and credentials that are required to be explained in further detail.

<u>Chartered Financial Consultant® (ChFC®)</u>: Chartered Financial Consultant (ChFC®) is a designation issued by the American College. ChFC® designation requirements:

- Complete ChFC® coursework within five years from the date of initial enrollment.
- Pass the exams for all required elective courses. A minimum score of 70% must be achieved to pass.
- Meet the experience requirements: Three years of full-time business experience within the five years preceding the date of the award. An undergraduate or graduate degree from an accredited educational institution qualifies as one year of business experience.
- Take the Professional Ethics Pledge.
- When you achieve your CHFC® designation, you must earn 30 hours of continuing education credit every two years.

<u>Chartered Life Underwriter (CLU®)</u>: Chartered Life Underwriter is a designation granted by the American College. CLU® designation requirements:

- Successfully complete CLU® coursework: five required and three elective courses.
- Meet the experience requirements: Three years of business experience immediately preceding the date of the use of the designation are required. An undergraduate or graduate degree from an accredited education institution qualifies as one year of business experience.
- Take the Professional Ethics Pledge.
- When you achieve the CLU® designation, you must complete 30 hours of continuing education credit every two years.

## **Item 3 Disciplinary Information**

Criminal or Civil Action: None to report.

Administrative Proceeding: None to report.

Self-Regulatory Proceeding: None to report.

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

Managing Member Ray Stagner is a licensed insurance agent. Approximately 60% of Mr. Stagner's time is spent in this practice. From time to time, he will offer Clients products and/or services in this capacity.

This represents a conflict of interest because it gives an incentive to recommend products and services based on the commission received. This conflict is mitigated by disclosures, procedures, and the firm's fiduciary obligation to place the best interest of the Client first and the Clients are not required to purchase any products or services. Clients have the option to purchase these products or services through another insurance agent of their choosing.

Mr. Stagner's other business activities include Stagner Holdings, LLC, and TREEK, LLC, businesses set up for his personal real estate holdings. Mr. Stagner is also a competitive fisherman. These outside business activities pose no conflict of interest.

# **Item 5 Additional Compensation**

Mr. Stagner receives additional compensation in his capacities as a licensed insurance agent, but he does not receive any performance-based fees.

## **Item 6 Supervision**

Ray Stagner is supervised by Tracy Stagner, Chief Compliance Officer of Stagner Financial Advisory. She reviews his work through client account reviews and quarterly personal transaction reports as well as face-to-face phone interactions. Ms. Stagner can be contacted by phone at 855-285-0316 or by email at tracy@stagnerfinancial.com.

# **Item 7 Requirements for State-Registered Advisors**

Arbitration Claims: None to report.

*Self-Regulatory Organization or Administrative Proceeding:* None to report.

Bankruptcy Petition: None to report.

Item 1 Cover Page

# SUPERVISED PERSON BROCHURE

FORM ADV PART 2B

Tracy L Stagner, CPA



Address:

2600 E. Memorial Road Edmond, OK 73013

> Tel: 855-285-0316 Fax: 866-251-1214

Tracy@stagnerfinancial.com

www.stagnerfinancial.com

This brochure supplement provides information about Tracy Stagner and supplements the Stagner Financial Advisory Group, LLC's brochure. You should have received a copy of that brochure. Please contact Tracy Stagner if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about Tracy Stagner (CRD#4798676) is available on the SEC's website at <a href="https://www.adviserinfo.sec.gov">www.adviserinfo.sec.gov</a>.

**SEPTEMBER 20, 2023** 

# **Brochure Supplement (Part 2B of Form ADV) Supervised Person Brochure**

# **Tracy Stagner**

• Year of birth: 1971

# Item 2 Educational Background and Business Experience

**Educational Background:** 

- Oklahoma Christian University; Bachelor of Science-Finance; 1993
- Northeastern State University; Master of Business Administration; 1998

## **Business Experience:**

- Stagner Financial Advisory Group, LLC dba Stagner Financial Advisory; Chief Compliance Officer; 06/2019 – Present
- Stagner Accounting Services, PLLC; Member/CPA; 01/2018 Present
- Stagner Financial Advisory Group, LLC dba Stagner Financial Advisory; Investment Advisor Representative; 11/2017 Present
- Stagner Financial Advisory Group, LLC dba Stagner Financial Advisory; Bookkeeper; 05/2009 Present

<u>Certified Public Accountant (CPA)</u>: A Certified Public Accountant is licensed by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include:

- Bachelor's degree from an accredited college or university with a concentration in accounting.
- Minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA.
- Successful completion of the CPA Certification Exam.
- Follow a rigorous Code of Professional Conduct which requires they act with integrity, objectivity, due care, competence, and fully disclose conflicts of interest.
- In order to maintain a CPA license, states generally require the completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a two-year period, or 120 hours over a three-year period).

# **Item 3 Disciplinary Information**

Criminal or Civil Action: None to report.

Administrative Proceeding: None to report.

Self-Regulatory Proceeding: None to report.

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

Tracy Stagner is a Certified Public Accountant. Approximately 50% of her time is spent in this practice. From time to time, she may offer clients products and/or services in this capacity.

This represents a conflict of interest because it gives an incentive to recommend products and services based on the commission received. This conflict is mitigated by disclosures, procedures, and the firm's fiduciary obligation to place the best interest of the client first and the client is not required to purchase any products or services. Clients have the option to purchase these products or services through another accountant or accounting firm of their choosing.

Ms. Stagner is also a member of Stagner Holdings, LLC, and TREEK, LLC. These businesses are set up for personal real estate holdings. These outside business activities pose no conflict of interest.

# **Item 5 Additional Compensation**

Tracy Stagner receives additional compensation in her capacity as an accountant, but she does not receive any performance-based fees.

# **Item 6 Supervision**

Tracy Stagner is the Chief Compliance Officer of Stagner Financial Advisory, she is solely responsible for all supervision and formulation and monitoring of investment advice offered to Clients. She will adhere to the policies and procedures as described in the firm's Compliance Manual.

# **Item 7 Requirements for State-Registered Advisors**

*Arbitration Claims:* None to report.

Self-Regulatory Organization or Administrative Proceeding: None to report.

Bankruptcy Petition: None to report.