

**AGP Franklin, LLC**

**dba Aspen Grove Asset Management**  
**dba Strong Tower Wealth Management, LLC**

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

**Effective: July 14, 2025**

This Form ADV Part 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of AGP Franklin, LLC (“AGP Franklin” or the “Advisor”). The Advisor conducts business under two practice names (“doing business as” or “dba” names), including Aspen Grove Asset Management and Strong Tower Wealth Management. If you have any questions about the content of this Disclosure Brochure, please contact the Advisor at 615-778-9842.

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

Additional information about AGP Franklin and its Advisory Persons is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor’s firm name or CRD# 331699.

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## Item 2 – Material Changes

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

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

### Material Changes

The following material changes have been made to this Disclosure Brochure since the initial filing July 25, 2024:

- The Advisor no longer uses independent managers. Please see Items 4, 5, and 10 for additional information.

### Future Changes

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

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or CRD# 331699. You may also request a copy of this Disclosure Brochure at any time by contacting the Advisor at 615-778-9842.

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## Item 4 – Advisory Services

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### A. Firm Information

AGP Franklin, LLC (“AGP Franklin” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission. The Advisor is organized as a Limited Liability Company (LLC) under the laws of the State of Tennessee. AGP Franklin was founded in May 2024. AGP Franklin is owned and operated by Charles D. Crouch (Managing Member and Chief Compliance Officer) and Edward B. Lewis (Member). The Advisor conducts business under the dba names of Aspen Grove Asset Management and Strong Tower Wealth Management. This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by AGP Franklin.

### B. Advisory Services Offered

AGP Franklin offers investment advisory services to individuals and high net worth individuals (each referred to as a “Client”).

The Advisor serves as a fiduciary to Clients, as defined under the applicable laws and regulations. As a fiduciary, the Advisor upholds a duty of loyalty, fairness and good faith towards each Client and seeks to mitigate potential conflicts of interest. AGP Franklin's fiduciary commitment is further described in the Advisor's Code of Ethics. For more information regarding the Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

#### Wealth Management Services

AGP Franklin provides customized wealth management services for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary and non-discretionary investment management and financial planning services.

*Investment Management Services* – AGP Franklin works closely with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create a portfolio strategy. AGP Franklin will then construct an investment portfolio, consisting of individual stock portfolios to achieve the Client's investment goals. The Advisor may also utilize mutual funds, bonds, low-cost, diversified exchange-traded funds (“ETFs”) and Real Estate Investment Trusts (“REITs”) to meet the needs of its Clients. The Advisor may retain other types of investments based on a Client's legacy portfolio due to fit with the overall portfolio strategy, tax-related reasons as identified between the Advisor and the Client.

AGP Franklin's investment strategies are primarily long-term focused, but the Advisor may buy, sell or re-allocate positions that have been held for less than one year to meet the objectives of the Client or due to market conditions. AGP Franklin will construct, implement and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to acceptance by the Advisor.

AGP Franklin evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. AGP Franklin may recommend, on occasion, redistributing investment allocations to diversify the portfolio. AGP Franklin may recommend specific positions to increase sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement.

AGP Franklin may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of the Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client's risk tolerance.

At no time will AGP Franklin accept or maintain custody of a Client's funds or securities, except for the limited authority as outlined in Item 15 – Custody. All Client assets will be managed within the designated account[s] at the Custodian, pursuant to the terms of the advisory agreement. Please see Item 12 – Brokerage Practices.

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*Retirement Accounts* – When the Advisor provides investment advice to Clients regarding ERISA retirement accounts or individual retirement accounts (“IRAs”), the Advisor is a fiduciary within the meaning of Title I of the Employee Retirement Income Security Act (“ERISA”) and/or the Internal Revenue Code (“IRC”), as applicable, which are laws governing retirement accounts. When deemed to be in the Client’s best interest, the Advisor will provide investment advice to a Client regarding a distribution from an ERISA retirement account or to roll over the assets to an IRA, or recommend a similar transaction including rollovers from one ERISA sponsored Plan to another, one IRA to another IRA, or from one type of account to another account (e.g. commission-based account to fee-based account). Such a recommendation creates a conflict of interest if the Advisor will earn a new (or increase its current) advisory fee as a result of the transaction. No client is under any obligation to roll over a retirement account to an account managed by the Advisor.

*Financial Planning Services* – AGP Franklin will typically provide a variety of financial planning and consulting services to Clients as part of its wealth management services. Services are offered in several areas of a Client’s financial situation, depending on their goals and objectives. Generally, such financial planning services involve preparing a formal financial plan or rendering a specific financial consultation based on the Client’s financial goals and objectives. This planning or consulting may encompass one or more areas of need, including but not limited to, investment planning, retirement planning, personal savings, education savings, insurance needs and other areas of a Client’s financial situation.

A financial plan developed for, or financial consultation rendered to the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs, commence or alter retirement savings, establish education savings and/or charitable giving programs.

AGP Franklin may also refer Clients to an accountant, attorney or other specialists, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of the 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 six (6) months of contract date, assuming all information and documents requested are provided promptly.

Financial planning and consulting recommendations pose a conflict between the interests of the Advisor and the interests of the Client. For example, the Advisor has an incentive to recommend that Clients engage the Advisor for investment management services or to increase the level of investment assets with the Advisor, as it would increase the amount of advisory fees paid to the Advisor. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to implement the transaction through the Advisor.

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

Prior to engaging AGP Franklin to provide investment advisory services, each Client is required to enter into an agreement with the Advisor that define the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Strategy – AGP Franklin, in connection with the Client, will develop a strategy that seeks to achieve the Client’s goals and objectives.
- Asset Allocation – AGP Franklin will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance for risk for each Client.
- Portfolio Construction – AGP Franklin will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – AGP Franklin will provide investment management and ongoing oversight of the Client’s investment portfolio.

## **D. Wrap Fee Programs**

AGP Franklin includes, in addition to certain custodial costs, administrative fees, other fees and expenses (herein "Covered Costs") together with its wealth management fees. Including these fees into a single asset-based fee is considered a "Wrap Fee Program". The Advisor customizes its wealth management services for its Clients. The Advisor sponsors the AGP Franklin Wrap Fee Program solely as a supplemental disclosure regarding the combination of fees. Depending on the level of trading required for the Client's account[s] in a particular year, the Client may pay more or less in total fees than if the Client paid its own transaction fees. Please see Appendix 1 – Wrap Fee Program Brochure, which is included as a supplement to this Disclosure Brochure.

## **E. Assets Under Management**

As of December 31, 2024, AGP Franklin manages \$195,168,875 in Client assets, \$178,100,511 of which is managed on a discretionary basis and \$17,068,364 on a non-discretionary basis. Clients may request more current information at any time by contacting the Advisor.

## **Item 5 – Fees and Compensation**

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The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client engaging the Advisor for services described herein shall be required to enter into a written agreement with the Advisor.

### **A. Fees for Advisory Services**

#### Wealth Management Services

Wealth management fees are paid quarterly in advance pursuant to the terms of the wealth management agreement. Wealth management fees are based on the market value of assets under management at the end of the prior calendar quarter. Wealth management fees range up to 2.25% annually based on several factors, including: the scope and complexity of the services to be provided; the level of assets to be managed; and the overall relationship with the Advisor. Relationships with multiple objectives, specific reporting requirements, portfolio restrictions and other complexities may be charged a higher fee.

The wealth management fee in the first quarter of service is prorated from the inception date of the account[s] to the end of the first quarter. Fees may be negotiable at the sole discretion of the Advisor. The Client's fees will take into consideration the aggregate assets under management with the Advisor. All securities held in accounts managed by AGP Franklin will be independently valued by the Custodian. The Advisor will conduct periodic reviews of the Custodian's valuation to ensure accurate billing. As noted in Item 4.D, the Advisor's wealth management fees will include Covered Costs. However, the Advisor shall not receive any portion of these commissions, fees, and costs.

### **B. Fee Billing**

#### Wealth Management Services

Wealth management fees are generally calculated by the Custodian and deducted directly from the Client's account(s) held with the Custodian. However, in certain situations, these fees may be calculated by the Advisor or delegate and deducted from the Client's account(s) at the Custodian. In such cases, the Advisor will provide an invoice to the Custodian at the start of the relevant quarter, specifying the amount to be deducted from the Client's account(s). The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management with AGP Franklin at the end of the prior quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the wealth management fee. Clients are urged to also review and compare the statement provided by the Advisor to the brokerage statement from the Custodian, as the Custodian does not perform a verification of fees. Clients provide written authorization permitting advisory fees to be deducted by AGP Franklin to be paid directly from their account[s] held by the Custodian as part of the wealth management agreement and separate account forms provided by the Custodian.

### **C. Other Fees and Expenses**

Clients may incur certain fees or charges imposed by third parties in connection with investments made on behalf of the Client's account[s]. AGP Franklin includes Covered Costs as part of its overall wealth management fee through

the AGP Franklin Wrap Fee Program. Securities transaction fees for Client-directed trades may be charged back to the Client. Please see Item 4.D. above as well as Appendix 1 – Wrap Fee Program Brochure.

In addition, all fees paid to AGP Franklin for wealth management services are separate and distinct from the expenses charged by mutual funds and ETFs to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client may be able to invest in these products directly, without the services of AGP Franklin, but would not receive the services provided by AGP Franklin which are designed, among other things, to assist the Client in determining which products or services are most appropriate for each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by AGP Franklin to fully understand the total fees to be paid. Please refer to Item 12 – Brokerage Practices for additional information.

#### **D. Advance Payment of Fees and Termination**

##### Wealth Management Services

AGP Franklin may be compensated for its wealth management services in advance of the quarter in which services are rendered. Either party may terminate the wealth management agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the wealth management agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Upon termination, the Advisor will refund any unearned, prepaid wealth management fees from the effective date of termination to the end of the quarter. The Client's wealth management agreement with the Advisor is non-transferable without the Client's prior consent.

#### **E. Compensation for Sales of Securities**

AGP Franklin does not buy or sell securities to earn commissions and does not receive any compensation for securities transactions in any Client account, other than the wealth management fees noted above.

##### Insurance Agency Affiliation

Certain Advisory Persons are licensed as independent insurance professionals. As an independent insurance professional, an Advisory Person may earn commission-based compensation for selling insurance products, including insurance products offered to Clients. Insurance commissions earned by the Advisory Person are separate and in addition to investment advisory fees. This practice presents a conflict of interest as an Advisory Person who is also an insurance professional will have an incentive to recommend insurance products to the Client for the purpose of generating commissions rather than solely based on the Client's needs. Clients are under no obligation, contractual or otherwise, to purchase insurance products through any Advisory Person affiliated with the Advisor. Please see Item 10 below.

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

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AGP Franklin does not charge performance-based fees for its investment advisory services. The fees charged by AGP Franklin are as described in Item 5 above and are not based upon the capital appreciation of the funds or securities held by any Client.

AGP Franklin does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

#### **Item 7 – Types of Clients**

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AGP Franklin offers investment advisory services to individuals and high net worth individuals. AGP Franklin generally does not impose a minimum relationship size.



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

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

AGP Franklin primarily employs a fundamental analysis method in developing investment strategies for its Clients. Research and analysis from AGP Franklin are derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

*Fundamental analysis* utilizes economic and business indicators as investment selection criteria. This criteria consists generally of ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

As noted above, AGP Franklin generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. AGP Franklin will typically hold all or a portion of a security for more than a year, but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, AGP Franklin may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector or asset class.

### **B. Risk of Loss**

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. AGP Franklin will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

While the methods of analysis help the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in these methods of analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account[s]. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. Following are some of the risks associated with the Advisor's investment strategies:

#### Market Risks

The value of a Client's holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad. This risk is linked to the performance of the overall financial markets.



### ETF Risks

The performance of ETFs is subject to market risk, including the possible loss of principal. The price of the ETFs will fluctuate with the price of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs has a large bid-ask spread and low trading volume. The price of an ETF fluctuates based upon the market movements and may dissociate from the index being tracked by the ETF or the price of the underlying investments. An ETF purchased or sold at one point in the day may have a different price than the same ETF purchased or sold a short time later.

### Mutual Fund Risks

The performance of mutual funds is subject to market risk, including the possible loss of principal. The price of the mutual funds will fluctuate with the value of the underlying securities that make up the funds. The price of a mutual fund is typically set daily therefore a mutual fund purchased at one point in the day will typically have the same price as a mutual fund purchased later that same day.

### Bond Risks

Bonds are subject to specific risks, including the following: (1) interest rate risks, i.e. the risk that bond prices will fall if interest rates rise, and vice versa, the risk depends on two things, the bond's time to maturity, and the coupon rate of the bond. (2) reinvestment risk, i.e. the risk that any profit gained must be reinvested at a lower rate than was previously being earned, (3) inflation risk, i.e. the risk that the cost of living and inflation increase at a rate that exceeds the income investment thereby decreasing the investor's rate of return, (4) credit default risk, i.e. the risk associated with purchasing a debt instrument which includes the possibility of the company defaulting on its repayment obligation, (5) rating downgrades, i.e. the risk associated with a rating agency's downgrade of the company's rating which impacts the investor's confidence in the company's ability to repay its debt and (6) Liquidity Risks, i.e. the risk that a bond may not be sold as quickly as there is no readily available market for the bond.

### Real Estate Investment Trusts ("REITs")

Investing in Real Estate Investment Trusts ("REITs") involves certain distinct risks in addition to those risks associated with investing in the real estate industry in general. For Example, equity REITs may be affected by changes in the value of the underlying property owned by the REITs, while mortgage REITs may be affected by the quality of credit extended. REITs are subject to heavy cash flow dependency, default by borrowers and self-liquidation. REITs, especially mortgage REITs, are also subject to interest rate risk (i.e., as interest rates rise, the value of the REIT may decline).

**Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.**

## **Item 9 – Disciplinary Information**

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Securities laws require an advisor to disclose any instances where the Advisor or its Advisory Persons have been found liable in a legal, regulatory, civil or arbitration matters that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. AGP Franklin values the trust Clients place in the Advisor. The Advisor encourages Clients to perform the requisite due diligence on any advisor or service provider that the Client engages. The backgrounds of the Advisor or Advisory Persons are available on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or CRD# 331699. Please note that Mr. Edward Lewis was subject to a judgement / lien in November 1996 which remains unresolved.

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

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### Insurance Agency Affiliation

As noted in Item 5, certain Advisory Persons are licensed insurance professionals. Implementations of insurance recommendations are separate and apart from one's role with the Advisor. As an insurance professional, the Advisory

Person will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Advisory Persons are not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset investment advisory fees. This presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by the Advisor or Advisory Persons.

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

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

AGP Franklin has implemented a Code of Ethics (the “Code”) that defines the Advisor’s fiduciary commitment to each Client. This Code applies to all persons associated with AGP Franklin (“Supervised Persons”). The Code was developed to provide general ethical guidelines and specific instructions regarding the Advisor’s duties to each Client. AGP Franklin and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of AGP Franklin’s Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code covers a range of topics that address employee ethics and conflicts of interest. To request a copy of the Code, please contact the Advisor at 615-778-9842.

### **B. Personal Trading with Material Interest**

AGP Franklin allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. AGP Franklin does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund, or advise an investment company. AGP Franklin does not have a material interest in any securities traded in Client accounts.

### **C. Personal Trading in Same Securities as Clients**

AGP Franklin allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities that are recommended (purchase or sell) to Clients presents a conflict of interest that, as fiduciaries, must be disclosed to Clients and mitigated through policies and procedures. As noted above, the Advisor has adopted the Code to address insider trading (material non-public information controls); gifts and entertainment; outside business activities and personal securities reporting. When trading for personal accounts, Supervised Persons have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by AGP Franklin requiring reporting of personal securities trades by its Supervised Persons for review by the Chief Compliance Officer (“CCO”) or delegate. The Advisor has also adopted written policies and procedures to detect the misuse of material, non-public information.

### **D. Personal Trading at Same Time as Client**

While AGP Franklin allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterwards. **At no time will AGP Franklin, or any Supervised Person of AGP Franklin, transact in any security to the detriment of any Client.**

## **Item 12 – Brokerage Practices**

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### **A. Recommendation of Custodian[s]**

AGP Franklin does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The Client will engage the broker-dealer/custodian (herein the “Custodian”) to safeguard Client assets and authorize AGP Franklin to direct trades to the Custodian as agreed upon in the investment advisory agreement. Further, AGP Franklin does not have the discretionary authority to negotiate commissions on behalf of Clients on a trade-by-trade basis.

Where AGP Franklin does not exercise discretion over the selection of the Custodian, it may recommend the Custodian to Clients for custody and execution services. Clients are not obligated to use the Custodian recommended

by the Advisor and will not incur any extra fee or cost associated with using a custodian not recommended by AGP Franklin. However, the Advisor may be limited in the services it can provide if the recommended Custodian is not engaged. AGP Franklin may recommend the Custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, and its reputation and/or the location of the Custodian's offices.

The Advisor will generally recommend that Clients establish their account[s] at Raymond James & Associates, Inc. ("Raymond James"). Raymond James is a FINRA-registered broker-dealer and New York Stock Exchange/SIPC member. Raymond James will serve as the Client's "qualified custodian". The Advisor maintains institutional relationships with Raymond James, whereby the Advisor receives economic benefits from the Custodian. Please see Item 14 below.

Following are additional details regarding the brokerage practices of the Advisor:

**1. Soft Dollars** - Soft dollars are revenue programs offered by broker-dealers/custodians whereby an advisor enters into an agreement to place security trades with a broker-dealer/custodian in exchange for research and other services. **AGP Franklin does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodian. However, the Advisor receives certain economic benefits from the Custodian. Please see Item 14 below.**

**2. Brokerage Referrals** - AGP Franklin does not receive any compensation from any third party in connection with the recommendation for establishing an account.

**3. Directed Brokerage** - All Clients are serviced on a "directed brokerage basis", where AGP Franklin will place trades within the established account[s] at the Custodian designated by the Client. Further, all Client accounts are traded within their respective account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). AGP Franklin will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the Custodian.

## **B. Aggregating and Allocating Trades**

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of the order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the Custodian. AGP Franklin will execute its transactions through the Custodian as authorized by the Client. AGP Franklin may aggregate orders in a block trade or trades when securities are purchased or sold through the Custodian for multiple (discretionary) accounts in the same trading day. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage any particular Clients' accounts.

## **Item 13 – Review of Accounts**

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### **A. Frequency of Reviews**

Securities in Client accounts are monitored on a regular and continuous basis by Advisory Persons and periodically reviewed by Charles Crouch, Chief Compliance Officer of AGP Franklin. Formal reviews are generally conducted at least annually or more frequently depending on the needs of the Client.

### **B. Causes for Reviews**

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or

withdrawals in the Client's account[s]. The Client is encouraged to notify AGP Franklin if changes occur in the Client's personal financial situation that might adversely affect the Client's investment plan. Additional reviews may be triggered by material market, economic or political events.

### **C. Review Reports**

The Client will receive brokerage statements no less than quarterly from the Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

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

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### **A. Compensation Received by AGP Franklin**

AGP Franklin is a fee-based advisory firm, that is compensated solely by its Clients and not from any investment product. AGP Franklin does not receive commissions or other compensation from product sponsors, broker-dealers or any un-related third party. AGP Franklin may refer Clients to various unaffiliated, non-advisory professionals (e.g. attorneys, accountants, estate planners) to provide certain financial services necessary to meet the goals of its Clients. Likewise, AGP Franklin may receive non-compensated referrals of new Clients from various third-parties.

#### Participation in Institutional Advisor Platform

As noted in item 12, the Advisor has established an institutional relationship with Raymond James to assist the Advisor in managing Client account[s]. As part of the arrangement, Raymond James makes available to the Advisor, certain research and brokerage services, including research services obtained by Raymond James directly from independent research companies. The Advisor may also receive additional services and support from Raymond James. The Advisor has an incentive to continue to use or expand the use of Raymond James's services. The Advisor examined this potential conflict of interest when it chose to enter into the relationship with Raymond James and has determined that the relationship is in the best interests of the Advisor's Clients and satisfies its Client obligations, including its duty to seek best execution. Please see Item 12 above. The Advisor receives access to software and related support because the Advisor renders investment management services to Clients that maintain assets at Raymond James. The software and related systems support may benefit the Advisor, but not its Clients directly. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a Custodian creates a conflict of interest since these benefits may influence the Advisor's recommendation of this Custodian over one that does not furnish similar software, systems support, or services

### **B. Compensation for Client Referrals**

The Advisor does not compensate, either directly or indirectly, any persons who are not supervised persons, for Client referrals.

## **Item 15 – Custody**

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AGP Franklin does not accept or maintain custody of Client accounts, except for the limited circumstances outlined below:

**Deduction of Advisory Fees** - To ensure compliance with regulatory requirements associated with the deduction of advisory fees, all Clients for whom AGP Franklin exercises discretionary authority must hold their assets with a "qualified custodian." Clients are responsible for engaging a "qualified custodian" to safeguard their funds and securities and must instruct AGP Franklin to utilize that Custodian for securities transactions on their behalf. Clients are encouraged to review statements provided by the Custodian and compare to any reports provided by AGP Franklin to ensure accuracy, as the Custodian does not perform this review.

## **Item 16 – Investment Discretion**

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AGP Franklin generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by AGP Franklin. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an investment advisory agreement containing all applicable limitations to such authority. All discretionary trades made by AGP Franklin will be in accordance with each Client's investment objectives and goals.

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

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AGP Franklin does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

## **Item 18 – Financial Information**

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

**AGP Franklin, LLC**  
**dba Aspen Grove Asset Management**  
**dba Strong Tower Wealth Management, LLC**

**Form ADV Part 2A – Appendix 1**  
**(“Wrap Fee Program Brochure”)**

**Effective: July 14, 2025**

This Form ADV2A - Appendix 1 (“Wrap Fee Program Brochure”) provides information about the qualifications and business practices for AGP Franklin, LLC (“AGP Franklin” or the “Advisor”) services when offering services pursuant to a wrap program. This Wrap Fee Program Brochure shall always be accompanied by the AGP Franklin Disclosure Brochure, which provides complete details on the business practices of the Advisor. If you did not receive the complete AGP Franklin Disclosure Brochure or you have any questions about the contents of this Wrap Fee Program Brochure or the AGP Franklin Disclosure Brochure, please contact the Advisor at 615-778-9842.

AGP Franklin is a registered investment advisor with the SEC. The information in this Wrap Fee Program Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Wrap Fee Program Brochure provides information about AGP Franklin to assist you in determining whether to retain the Advisor.

Additional information about AGP Franklin and its advisory persons are available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching the Advisor’s firm name or CRD# 331699.



## Item 2 – Material Changes

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Form ADV 2A - Appendix 1 provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. In particular, this Wrap Fee Program Brochure discusses the Wrap Fee Program offered by the Advisor.

### Material Changes

The following material changes have been made to this Wrap Fee Program Brochure since the initial filing July 25, 2024:

- The Advisor no longer uses independent managers. Please see Item 4 for additional information.

### Future Changes

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

At any time, you may view this Wrap Fee Program Brochure and the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching for the Advisor's firm name or CRD# 331699. You may also request a copy of this Disclosure Brochure at any time, by contacting the Advisor at 615-778-9842.

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## **Item 4 – Services Fees and Compensation**

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### **A. Services**

AGP Franklin provides customized investment advisory services for its Clients. This Wrap Fee Program Brochure is provided as a supplement to the AGP Franklin Disclosure Brochure (Form ADV 2A). This Wrap Fee Program Brochure is provided along with the complete Disclosure Brochure to provide full details of the business practices and fees when selecting AGP Franklin as your investment advisor.

As part of the wealth management fees noted in Item 5 of the Disclosure Brochure, AGP Franklin includes, in addition to securities transaction fees, certain custodial, and administrative services fees. (herein “Covered Costs”) as part of the overall wealth management fee. Securities regulations often refer to this combined fee structure as a “Wrap Fee Program”. The Advisor’s recommended Custodian does not charge securities transaction fees for exchange-traded fund (“ETF”) and equity trades in Client accounts, but typically charges for mutual funds and other types of investments. The Advisor sponsors the AGP Franklin Wrap Fee Program.

The sole purpose of this Wrap Fee Program Brochure is to provide additional disclosure relating the combination of Covered Costs into a single “bundled” wealth management fee. This Wrap Fee Program Brochure references back to the AGP Franklin Disclosure Brochure in which this Wrap Fee Program Brochure serves as an Appendix. **Please see Item 4 – Advisory Services of the Disclosure Brochure for details on AGP Franklin’s investment philosophy and related services.**

### **B. Program Costs**

Advisory services provided by AGP Franklin are offered in a wrap fee structure whereby Covered Costs are included in the overall wealth management fee paid to AGP Franklin. As the level of activity in a Client’s account[s] may vary from year to year, the annual cost to the Client may be more or less than engaging for advisory services where the Covered Costs are borne separately by the Client. The cost of the Wrap Fee Program varies depending on services to be provided to each Client, however, the Client is not charged more if there is higher trading activity or other Covered Costs. A Wrap Fee structure presents a conflict of interest as the Advisor is incentivized to limit the number of trades placed in the Client’s account[s] or to utilize securities that do not have transaction fees. As noted above, the Advisor’s recommended Custodian does not charge securities transaction fees for ETF and equity trades in Client accounts, but typically charges for mutual funds and other types of investments. As such, the Advisor is incentivized to utilize ETFs and other equity securities to limit the overall cost to the Advisor. The Advisor will only place Client assets into a Wrap Fee Program when it is believed to be in the Client’s best interest. **Please see Item 5 – Fees and Compensation of the Disclosure Brochure for complete details on fees.**

### **C. Fees**

#### Wealth Management Services

Wealth management fees are paid quarterly in advance pursuant to the terms of the wealth management agreement. Wealth management fees are based on the market value of assets under management at the end of the prior calendar quarter. Wealth management fees range up to 2.25% annually based on several factors, including: the scope and complexity of the services to be provided; the level of assets to be managed; and the overall relationship with the Advisor. Relationships with multiple objectives, specific reporting requirements, portfolio restrictions and other complexities may be charged a higher fee.

The wealth management fee in the first quarter of service is prorated from the inception date of the account[s] to the end of the first quarter. Fees may be negotiable at the sole discretion of the Advisor. The Client’s fees will take into consideration the aggregate assets under management with the Advisor. All securities held in accounts managed by AGP Franklin will be independently valued by the Custodian. The Advisor will conduct periodic reviews of the Custodian’s valuation to ensure accurate billing. As noted in Item 4.D of the Disclosure Brochure, the Advisor’s wealth management fees will include Covered Costs. However, the Advisor shall not receive any portion of these commissions, fees, and costs.

As noted above, the Wrap Fee Program includes Covered Costs incurred in connection with the discretionary wealth management services provided by AGP Franklin, as part of its overall wealth management fee.

In addition, all fees paid to AGP Franklin for wealth management services or part of the Wrap Fee Program are separate and distinct from the expenses charged by mutual funds and exchange-traded funds to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. Securities transaction fees for Client-directed trades will be charged back to the Client. In connection with the discretionary wealth management services provided by AGP Franklin, the Client will incur other costs assessed by the Custodian or other third parties, other than the Covered Costs noted above, such as wire transfer fees, fees for trades executed away from the Custodian, IRA custodial fees and other fees. The Advisor does not control nor share in these fees. The Client should review both the fees charged by the fund[s] and the fees charged by AGP Franklin to fully understand the total fees to be paid. Please see Item 5.C. – Other Fees and Expenses in the Disclosure Brochure (included with this Wrap Fee Program Brochure).

#### **D. Compensation**

AGP Franklin is the sponsor and portfolio manager of this Wrap Fee Program. AGP Franklin receives investment advisory fees paid by Clients for participating in the Wrap Fee Program and pays the Covered Costs associated with the management of the Client's account[s].

### **Item 5 – Account Requirements and Types of Clients**

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AGP Franklin offers investment advisory services to individuals and high net worth individuals. AGP Franklin generally does not impose a minimum account size for establishing a relationship. Please see Item 7 – Types of Clients in the Disclosure Brochure for additional information.

### **Item 6 – Portfolio Manager Selection and Evaluation**

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#### **Portfolio Manager Selection**

AGP Franklin serves as sponsor and as portfolio manager for the services under this Wrap Fee Program.

#### **Related Persons**

AGP Franklin personnel serve as portfolio managers for this Wrap Fee Program. AGP Franklin does not serve as a portfolio manager for any third-party Wrap Fee Programs.

#### **Performance-Based Fees**

AGP Franklin does not charge performance-based fees for its wealth management services. The fees charged by AGP Franklin are as described in Item 5 of the Disclosure Brochure and are not based upon the capital appreciation of the funds or securities held by any Client.

AGP Franklin does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

#### **Supervised Persons**

AGP Franklin Advisory Persons serve as portfolio managers for all accounts, including the services described in this Wrap Fee Program Brochure. Details of the advisory services provided are included in Item 4.A. of the Disclosure Brochure.

#### **Methods of Analysis**

Please see Item 8 of the Disclosure Brochure (included with this Wrap Fee Program Brochure) for details on the research and analysis methods employed by the Advisor.

#### **Risk of Loss**

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. AGP Franklin will assist Clients in determining an appropriate strategy

based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

While the methods of analysis help the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in these methods of analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included in Item 13 – Review of Accounts of the Disclosure Brochure.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account[s]. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. Following are some of the risks associated with the Advisor's investment strategies:

#### Market Risks

The value of a Client's holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad. This risk is linked to the performance of the overall financial markets.

#### ETF Risks

The performance of ETFs is subject to market risk, including the possible loss of principal. The price of the ETFs will fluctuate with the price of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs has a large bid-ask spread and low trading volume. The price of an ETF fluctuates based upon the market movements and may dissociate from the index being tracked by the ETF or the price of the underlying investments. An ETF purchased or sold at one point in the day may have a different price than the same ETF purchased or sold a short time later.

#### Mutual Fund Risks

The performance of mutual funds is subject to market risk, including the possible loss of principal. The price of the mutual funds will fluctuate with the value of the underlying securities that make up the funds. The price of a mutual fund is typically set daily therefore a mutual fund purchased at one point in the day will typically have the same price as a mutual fund purchased later that same day.

#### Bond Risks

Bonds are subject to specific risks, including the following: (1) interest rate risks, i.e. the risk that bond prices will fall if interest rates rise, and vice versa, the risk depends on two things, the bond's time to maturity, and the coupon rate of the bond. (2) reinvestment risk, i.e. the risk that any profit gained must be reinvested at a lower rate than was previously being earned, (3) inflation risk, i.e. the risk that the cost of living and inflation increase at a rate that exceeds the income investment thereby decreasing the investor's rate of return, (4) credit default risk, i.e. the risk associated with purchasing a debt instrument which includes the possibility of the company defaulting on its repayment obligation, (5) rating downgrades, i.e. the risk associated with a rating agency's downgrade of the company's rating which impacts the investor's confidence in the company's ability to repay its debt and (6) Liquidity Risks, i.e. the risk that a bond may not be sold as quickly as there is no readily available market for the bond.

#### Real Estate Investment Trusts ("REITs")

Investing in Real Estate Investment Trusts ("REITs") involves certain distinct risks in addition to those risks associated with investing in the real estate industry in general. For Example, equity REITs may be affected by changes in the

value of the underlying property owned by the REITs, while mortgage REITs may be affected by the quality of credit extended. REITs are subject to heavy cash flow dependency, default by borrowers and self-liquidation. REITs, especially mortgage REITs, are also subject to interest rate risk (i.e., as interest rates rise, the value of the REIT may decline).

**Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor. Please see Item 8.B. – Risk of Loss in the Disclosure Brochure for details on investment risks.**

#### **Proxy Voting**

AGP Franklin does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

### **Item 7 – Client Information Provided to Portfolio Managers**

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AGP Franklin is the sponsor and sole portfolio manager for the Program. The Advisor does not share Client information with other portfolio managers because it is the sole portfolio manager for this Wrap Fee Program. Please also see the AGP Franklin Privacy Policy (included after this Wrap Fee Program Brochure).

### **Item 8 – Client Contact with Portfolio Managers**

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AGP Franklin is a full-service investment management advisory firm. Clients always have direct access to the Portfolio Managers at AGP Franklin.

### **Item 9 – Additional Information**

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#### **A. Disciplinary Information and Other Financial Industry Activities and Affiliations**

Securities laws require an advisor to disclose any instances where the Advisor or its Advisory Persons have been found liable in a legal, regulatory, civil or arbitration matters that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. AGP Franklin values the trust Clients place in the Advisor. The Advisor encourages Clients to perform the requisite due diligence on any advisor or service provider that the Client engages. The backgrounds of the Advisor or Advisory Persons are available on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or CRD# 331699. Please note that Mr. Edward Lewis was subject to a judgement / lien in November 1996 which remains unresolved.

Please see Item 9 of the AGP Franklin Disclosure Brochure as well as Item 3 of each Advisory Person's Brochure Supplement (included with this Wrap Fee Program Brochure) for additional information on how to research the background of the Advisor and its Advisory Persons.

#### Other Financial Activities and Affiliations

Please see Item 10 – Other Financial Activities and Affiliation and Item 14 – Client Referrals and Other Compensation of the Form ADV Part 2A – Disclosure Brochure (included with this Wrap Fee Program Brochure).

#### **B. Code of Ethics, Review of Accounts, Client Referrals, and Financial Information**

AGP Franklin has implemented a Code of Ethics that defines the Advisor's fiduciary commitment to each Client. This Code of Ethics applies to all persons subject to AGP Franklin's compliance program (our "Supervised Persons"). Complete details on the AGP Franklin Code of Ethics can be found under Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading in the Disclosure Brochure (included with this Wrap Fee Program Brochure).

#### Review of Accounts

Client accounts are monitored on a regular and continuous basis by Advisory Persons of AGP Franklin under the supervision of the Chief Compliance Officer ("CCO"). Details of the review policies and practices are provided in Item 13 of the Form ADV Part 2A – Disclosure Brochure.

#### Other Compensation

The Advisor has established an institutional relationship with Raymond James to assist the Advisor in managing Client account[s]. As part of the arrangement, Raymond James makes available to the Advisor, certain research and brokerage services, including research services obtained by Raymond James directly from independent research companies. The Advisor may also receive additional services and support from Raymond James. The Advisor has an incentive to continue to use or expand the use of Raymond James's services. The Advisor examined this potential conflict of interest when it chose to enter into the relationship with Raymond James and has determined that the relationship is in the best interests of the Advisor's Clients and satisfies its Client obligations, including its duty to seek best execution. Please see Item 12 in the Disclosure Brochure. The Advisor receives access to software and related support because the Advisor renders investment management services to Clients that maintain assets at Raymond James. The software and related systems support may benefit the Advisor, but not its Clients directly. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a Custodian creates a conflict of interest since these benefits may influence the Advisor's recommendation of this Custodian over one that does not furnish similar software, systems support, or services.

Please see Item 14 – Other Compensation in the Form ADV Part 2A – Disclosure Brochure (included with this Wrap Fee Program Brochure) for details on additional compensation that may be received by AGP Franklin or its Advisory Persons. Each Advisory Person's Brochure Supplement (also included with this Wrap Fee Program Brochure) provides details on any outside business activities and the associated compensation.

#### Client Referrals from Solicitors

The Advisor does not compensate, either directly or indirectly, any persons who are not supervised persons, for Client referrals.

#### Financial Information

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





**AGP Franklin, LLC  
(dba Aspen Grove Asset Management)**

**Form ADV Part 2B – Brochure Supplement**

**for**

**Charles D. Crouch  
Managing Member and Chief Compliance Officer**

**Effective: July 14, 2025**

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of Charles D. Crouch (CRD# 2122991) in addition to the information contained in the AGP Franklin, LLC ("AGP Franklin" or the "Advisor", CRD# 331699) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the AGP Franklin Disclosure Brochure or this Brochure Supplement, please contact us at 615-778-9842.

Additional information about Mr. Crouch is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 2122991.

## Item 2 – Educational Background and Business Experience

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Charles D. Crouch, born in 1951, is dedicated to advising Clients of AGP Franklin as the Managing Member and Chief Compliance Officer. Mr. Crouch earned a Bachelor of Science – Business Administration from David Lipscomb University in 1975. Additional information regarding Mr. Crouch's employment history is included below.

### Employment History:

Managing Member and Chief Compliance Officer, AGP Franklin, LLC dba Aspen Grove Asset Management	05/2024 to Present
CEO, Aspen Grove Asset Management	07/2011 to 07/2024
Investment Advisor Representative, Raymond James Financial Services Advisors, Inc.	01/2009 to 07/2024
Registered Representative, Raymond James Financial Services, Inc.	11/2002 to 07/2024

## Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Crouch.*** Mr. Crouch has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Crouch.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Crouch.***

However, we do encourage you to independently view the background of Mr. Crouch on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 2122991.

## Item 4 – Other Business Activities

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### Insurance Agency Affiliations

Mr. Crouch is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Crouch's role with AGP Franklin. As an insurance professional, Mr. Crouch will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Crouch is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Crouch or the Advisor. Mr. Crouch spends approximately 10% of his time per month in this capacity.

## Item 5 – Additional Compensation

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Mr. Crouch has additional business activities where compensation is received that are detailed in Item 4 above.

## Item 6 – Supervision

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Mr. Crouch serves as the Managing Member and Chief Compliance Officer of AGP Franklin. Mr. Crouch can be reached at 615-778-9842.

AGP Franklin has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of AGP Franklin. Further, AGP Franklin is subject to regulatory oversight by various agencies. These agencies require registration by AGP Franklin and its Supervised Persons. As a registered entity, AGP Franklin is subject to examinations by regulators, which may be announced or unannounced.

AGP Franklin is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



**AGP Franklin, LLC  
(dba Strong Tower Wealth Management, LLC)**

**Form ADV Part 2B – Brochure Supplement**

**for**

**Edward B. Lewis  
Member**

**Effective: July 14, 2025**

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of Edward B. Lewis (CRD# 2248235) in addition to the information contained in the AGP Franklin, LLC ("AGP Franklin" or the "Advisor", CRD# 331699) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the AGP Franklin Disclosure Brochure or this Brochure Supplement, please contact us at 615-778-9842.

Additional information about Mr. Lewis is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 2248235.

## **Item 2 – Educational Background and Business Experience**

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Edward B. Lewis, born in 1968, is dedicated to advising Clients of AGP Franklin as a Member. Mr. Lewis earned a Bachelor of Science from University of Arkansas - Fayetteville in 1991. Additional information regarding Mr. Lewis's employment history is included below.

### **Employment History:**

Member, AGP Franklin, LLC dba Strong Tower Wealth Management, LLC	07/2024 to Present
Financial Advisor, Eudaimonia Partners, LLC dba Strong Tower Wealth Management, LLC	09/2020 to 07/2024
Investment Advisor Representative, Morgan Stanley	04/2011 to 09/2020
Registered Representative, Morgan Stanley	03/2011 to 09/2020

## **Item 3 – Disciplinary Information**

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Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices.

Mr. Lewis has events that require disclosure. These can be found on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name (Edward Lewis) or his Individual CRD# 2248235.

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

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### Insurance Agency Affiliations

Mr. Lewis is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Lewis's role with AGP Franklin. As an insurance professional, Mr. Lewis will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Lewis is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Lewis or the Advisor. Mr. Lewis spends less than 5% of his time per month in this capacity.

## **Item 5 – Additional Compensation**

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Mr. Lewis has additional business activities where compensation is received that are detailed in Item 4 above.

## **Item 6 – Supervision**

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Mr. Lewis serves as a Member of AGP Franklin and is supervised by Charles Crouch, the Chief Compliance Officer. Mr. Crouch can be reached at 615-778-9842.

AGP Franklin has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of AGP Franklin. Further, AGP Franklin is subject to regulatory oversight by various agencies. These agencies require registration by AGP Franklin and its Supervised Persons. As a registered entity, AGP Franklin is subject to examinations by regulators, which may be announced or unannounced. AGP Franklin is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



## **Form ADV Part 2B – Brochure Supplement**

**for**

**Jacob R. Hester  
Financial Advisor**

**Effective: July 14, 2025**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Jacob R. Hester (CRD# 6958041) in addition to the information contained in the AGP Franklin, LLC (“AGP Franklin” or the “Advisor”, CRD# 331699) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the AGP Franklin Disclosure Brochure or this Brochure Supplement, please contact us at 615-778-9842.

Additional information about Mr. Hester is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 6958041.



## Item 2 – Educational Background and Business Experience

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Jacob R. Hester, born in 1997, is dedicated to advising Clients of AGP Franklin as a Planning Coordinator. Mr. Hester earned a Bachelor's Degree in Finance from Eastern Michigan University in 2018. Additional information regarding Mr. Hester's employment history is included below.

### Employment History:

Planning Coordinator, AGP Franklin, LLC dba Strong Tower Wealth Management, LLC	09/2024 to Present
Customer Support Specialist, eMoney Advisor	03/2022 to 02/2023
Paraplanner, Evangelista and Associates	05/2020 to 01/2021
Director of Planning, Archer Huntley Financial Services	05/2018 to 05/2019
Universal Banker, Citizens Bank	05/2017 to 12/2017

## Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Hester.*** Mr. Hester has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Hester.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Hester.***

However, we do encourage you to independently view the background of Mr. Hester on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 6958041.

## Item 4 – Other Business Activities

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Mr. Hester is dedicated to the investment advisory activities of AGP Franklin's Clients. Mr. Hester does not have any other business activities.

## Item 5 – Additional Compensation

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Mr. Hester is dedicated to the investment advisory activities of AGP Franklin's Clients. Mr. Hester does not receive any additional forms of compensation.

## Item 6 – Supervision

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Mr. Hester serves as a Planning Coordinator of AGP Franklin and is supervised by Charles Crouch, the Chief Compliance Officer. Mr. Crouch can be reached at 615-778-9842.

AGP Franklin has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of AGP Franklin. Further, AGP Franklin is subject to regulatory oversight by various agencies. These agencies require registration by AGP Franklin and its Supervised Persons. As a registered entity, AGP Franklin is subject to examinations by regulators, which may be announced or unannounced. AGP Franklin is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



**AGP Franklin, LLC  
(dba Aspen Grove Asset Management)**

**Form ADV Part 2B – Brochure Supplement**

**for**

**Ethan P. Pflug  
Financial Advisor**

**Effective: July 14, 2025**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Ethan P. Pflug (CRD# 7569627) in addition to the information contained in the AGP Franklin, LLC (“AGP Franklin” or the “Advisor”, CRD# 331699) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the AGP Franklin Disclosure Brochure or this Brochure Supplement, please contact us at 615-778-9842.

Additional information about Mr. Pflug is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 7569627.

**Aspen Grove Asset Management**  
3326 Aspen Grove Drive Suite 602 Franklin, TN 37067  
Phone: 615-778-9842  
[www.aspengroveassetmanagement.com](http://www.aspengroveassetmanagement.com)

**Strong Tower Wealth Management, LLC**  
725 Cool Springs Blvd., Suite 330, Franklin, TN 37067  
Phone: 615-807-2247  
[www.strongtowerwealthmanagement.com](http://www.strongtowerwealthmanagement.com)

## Item 2 – Educational Background and Business Experience

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Ethan P. Pflug, born in 2003, is dedicated to advising Clients of AGP Franklin as a Financial Advisor. Mr. Pflug earned a Double Major in Finance and Economics from the University of Alabama in 2025. Additional information regarding Mr. Pflug's employment history is included below.

### Employment History:

Financial Advisor, AGP Franklin, LLC DBA Aspen Grove Asset Management	07/2025 to Present
Student, University of Alabama	08/2021 to 05/2025
Intern, Aspen Grove Asset Management	05/2022 to 08/2024

## Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Pflug.*** Mr. Pflug has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Pflug.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Pflug.***

However, we do encourage you to independently view the background of Mr. Pflug on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 7569627.

## Item 4 – Other Business Activities

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Mr. Pflug is dedicated to the investment advisory activities of AGP Franklin's Clients. Mr. Pflug does not have any other business activities.

## Item 5 – Additional Compensation

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Mr. Pflug is dedicated to the investment advisory activities of AGP Franklin's Clients. Mr. Pflug does not receive any additional forms of compensation.

## Item 6 – Supervision

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Mr. Pflug serves as a Financial Advisor of AGP Franklin and is supervised by Charles Crouch, the Chief Compliance Officer. Mr. Crouch can be reached at 615-778-9842.

AGP Franklin has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of AGP Franklin. Further, AGP Franklin is subject to regulatory oversight by various agencies. These agencies require registration by AGP Franklin and its Supervised Persons. As a registered entity, AGP Franklin is subject to examinations by regulators, which may be announced or unannounced. AGP Franklin is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

## Privacy Policy

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Effective: July 14, 2025

### Our Commitment to You

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

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

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

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

### Why you need to know?

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

### What information do we collect from you?

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

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

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

### How do we protect your information?

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

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

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[www.aspengroveassetmanagement.com](http://www.aspengroveassetmanagement.com)

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Phone: 615-807-2247  
[www.strongtowerwealthmanagement.com](http://www.strongtowerwealthmanagement.com)

### How do we share your information?

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

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

### Changes to our Privacy Policy

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

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

### Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at 615-778-9842.