

# **Estate Counselors, LLC**

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**March 15, 2016**

## **FORM ADV PART 2A BROCHURE**

This Brochure provides information about the qualifications and business practices of Estate Counselors, LLC. If you have any questions about the contents of this Brochure, please contact us at (262) 238-6996 or at [firm@estatecounselors.com](mailto:firm@estatecounselors.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 Estate Counselors, LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The searchable IARD/CRD number for Estate Counselors, LLC is 123452.

Estate Counselors, LLC is a Registered Investment Advisor. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

Communications between Estate Counselors, LLC and its clients are not covered by the attorney-client privilege, and as a result may be discoverable by third parties. All such communications are, however, covered by Estate Counselors, LLC's privacy policy, a copy of which is available upon request.

## Item 2 Summary of Material Changes

Form ADV Part 2 requires registered investment advisors to amend their brochure when information becomes materially inaccurate. If there are any material changes to an advisor's disclosure brochure, the advisor is required to notify you and provide you with a description of the material changes.

Since the filing of our last annual updating amendment, dated March 20, 2015 we have no material changes to report.

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## Item 4 Advisory Business

### **Description of Services and Fees**

Estate Counselors, LLC is a registered investment advisor based in Thiensville, WI. We are organized as a limited liability company under the laws of the State of Wisconsin. We have been providing investment advisory services since 2004, formerly under the name of Willms, S.C. and since January 20, 2010 as Estate Counselors, LLC. Andrew J. Willms is the sole member of the company.

A description of our services and fees follows. As used in this Brochure, the words "we", "our", and "us" refer to Estate Counselors, LLC and the words "you", "your", and "client" refer to clients and prospective clients of our Firm. "Associated Persons" refers to our Firm's officers, employees, and all individuals providing investment advice on behalf of our Firm.

### **Investment Approach**

Estate Counselors, LLC is an independent financial advisor that provides portfolio management services to individuals, trusts, investment entities, and charitable organizations.

As discussed further below, our investment approach is based on our belief that over the long-term investment results are optimized by investing primarily in a strategically diversified portfolio of index based exchange traded funds and individual bonds that are monitored over time, periodically rebalanced, and adjusted as appropriate to reflect changes in the securities market, the economy, and the investor's personal situation. It consists of six essential components. Those components are:

- Development of a diversified model portfolio that is tailored to each individual client's investment objectives and risk tolerance.
- Selection of low cost index funds and individual bonds to implement the model portfolio.
- Periodically adjusting the model portfolio's target allocations to reflect changes in market volatility and the market weights of the asset classes that are included in the model portfolio in an effort to enhance the portfolio's risk adjusted rate of return and minimize volatility.
- Periodically adjusting the model portfolio's target allocations in an effort to enhance the portfolio's risk adjusted rate of return and minimize volatility.
- Monitoring of forward-looking equity market statistics and economic indicators in an effort to identify when it may be appropriate to hedge against market bubbles or developing adverse economic conditions.
- Maximizing tax efficiency by harvesting capital losses when appropriate.

While our investment approach is intended to tailor our client's portfolios to their personal risk tolerance, there is no guarantee that the investments we recommend, or the stock market generally, will perform in the future as they have in the past. As a result, even though a portfolio is intended to result in a certain level of risk, the actual volatility experienced in the account's value may be greater or less than anticipated.

### **Types of Investments**

As mentioned above, we primarily recommend that index tracking mutual funds and exchange traded funds be used to implement our investment recommendations. However, we are not limited to any single type of security. We may give advice on mutual funds, equity securities, corporate and government bonds, certificates of deposit, municipal securities, investment company securities, U.S. government securities, and option contracts on securities.

Additionally, we may advise you on any type of investment that we deem appropriate based on your stated goals and objectives. We may also provide advice on any type of investment held in your portfolio at the inception of our advisory relationship.

You may request that we refrain from investing in particular securities or certain types of securities. These restrictions must be provided in advance by you to our Firm in writing.

### **Assets Under Management**

As of 12/31/2015, we manage \$389,075,629 in client assets on a discretionary basis, and \$3,799,373 in client assets on a non-discretionary basis.

## **Item 5 Fees and Compensation**

Our fee for portfolio management services is based on a percentage of your assets we manage determined in accordance with the following fee schedule:

<b>Assets Under Management</b>	<b>Annual Fee</b>
First \$1,000,000	0.75%
Next \$1,500,000	0.60%
Next \$2,500,000	0.50%
Next \$10,000,000	0.40%
Over \$15,000,000	0.35%

Our portfolio management fees are billed and payable monthly in arrears based on the value of your account on the last day of the month. If the investment management agreement is executed at any time other than the first day of a calendar month, our fees will apply on a pro rata basis, which means that the advisory fee is payable in proportion to the number of days in the month for which you are a client. Clients will be billed a 1% per month interest charge for unpaid invoices over 30 days old. Clients may incur a onetime set up fee separate from the hourly charges.

We also offer consulting services which primarily involves advising clients on specific financial-related topics. The topics we address may include, but are not limited to, risk assessment/management, investment planning, financial organization, or financial decision making/negotiation. We charge a negotiable hourly fee for advisory consulting services according to the following hourly fee schedule:

<b>Counselor</b>	<b>Rate</b>
Andrew J. Willms Esq.	\$500.00/hour
Mark Steffke	\$250.00/hour
Shrey Patel	\$200.00/hour

Our advisory fee is negotiable, depending on individual client circumstances. At our discretion, we may combine the account values of family members living in the same household to determine the applicable advisory fee. For example, we may combine account values for you and your minor

children, joint accounts with your spouse, and other types of related accounts. Combining account values will increase the amount of assets to which our fee schedule is applied, which may result in your paying a reduced advisory fee based on the available breakpoints in our fee schedule stated above.

We will send you an invoice for the payment of our advisory fee, or we will deduct our fee directly from your account through the qualified custodian holding your funds and securities. We will deduct our advisory fee only when you have given our Firm written authorization permitting the fees to be paid directly from your account. Further, the qualified custodian will deliver an account statement to you each month. These account statements will show all disbursements from your account. You should review all statements for accuracy. We will also receive a duplicate copy of your account statements.

You may terminate the portfolio management agreement upon written notice to our Firm. You will incur a pro rata charge for services rendered prior to the termination of the portfolio management agreement, which means you will incur advisory fees only in proportion to the number of days in the month for which you are a client.

We encourage you to reconcile our invoices with the statement(s) you receive from the qualified custodian. If you find any inconsistent information between our invoice and the statement(s) you receive from the qualified custodian please call our main office number located on the cover page of this Brochure.

#### **Additional Fees and Expenses**

The fees that you pay to our Firm for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds or exchange traded funds (described in each fund's prospectus) to their shareholders. These fees will generally include a management fee and other fund expenses. However, we only recommend no-load funds, and we never collect a fee or commission from the mutual fund provider.

You will also incur transaction charges and/or brokerage fees when purchasing or selling securities. These charges and fees are typically imposed by the broker-dealer or custodian through which your account transactions are executed. We do not share in any portion of the brokerage fees/transaction charges imposed by the broker-dealer or custodian. To fully understand the total cost you will incur, you should review all the fees charged by mutual funds, exchange traded funds, our Firm, and others. For information on our brokerage practices, please refer to the "Brokerage Practices" section of this Disclosure Brochure.

You may elect to use margin loans to purchase securities to be held in your portfolio. Our management fees are based on the total asset value of your account (less cash and cash equivalents), which includes the value of the securities purchased on margin. While a negative amount may show on your brokerage statement for the margined security as the result of a lower net market value, the amount of the fee is based on the absolute market value (less cash and cash equivalents). As a result, the recommendation of margin loans to fund security purchases may cause a conflict of interest because it results in a higher market value of securities and therefore we receive a higher fee. The use of margin may also result in interest charges in addition to all other fees and expenses associated with the security involved.

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

We do not accept performance-based fees or participate in side-by-side management. (Performance-based fees are fees that are based on a share of capital gains or capital appreciation of a client's account. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees. ) Our fees are calculated as described in the *Advisory Business* section above, and are not charged on the basis of a share of capital gains upon, or capital appreciation of, the funds in your advisory account.

## Item 7 Types of Clients

We offer portfolio advisory services to individuals, trusts, investment entities, and charitable organizations.

In general, we require a minimum of \$500,000 to open and maintain an advisory account. At our discretion, we may waive this minimum account size. We may combine account values for you and your minor children, joint accounts with your spouse, and other types of related accounts to meet the stated minimum.

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

### Our Methods of Analysis and Investment Strategies

A. Step 1 - Construct model portfolios for clients.

1. Evaluate the client's risk tolerance and investment objectives.
2. Identify an appropriate benchmark for a given level of risk tolerance.
3. Develop a model portfolio consisting of index tracking ETFs.

B. Step 2 - Periodically rebalance the portfolio in an effort to generate improved risk adjusted rates of return, avoid style drift, and risk concentration. Estate Counselors, LLC has developed two unique rebalancing strategies which we refer to as Volatility Adjusted Adaptive Asset Allocation ("VA4") and Classic Asset Allocation Rebalancing (CAAR).

1. VA4 utilizes a three step approach to portfolio rebalancing.
  - a. Adjust the portfolio's target allocations to reflect proportionate changes in the relative values of the overall stock and bond markets. This component is based on Professor William Sharpe's research on adaptive asset allocations.<sup>[1]</sup>
  - b. Target asset allocations are also adjusted in response to significant changes in the volatility of equity markets (decreasing allocations to riskier assets such as equities when volatility is high, and vice versa). This component is based on research by Russell Investments (Volatility-Responsive Asset Allocation).<sup>[2]</sup>

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<sup>[1]</sup> Professor William F. Sharpe, *Adaptive Asset Allocation Policies*, Stanford University Press, November, 2009.

<sup>[2]</sup> Russell Investments, "Volatility-Responsive Asset Allocation", August, 2011.

- c. We also incorporate a Hidden Markov Model ("HMM") when rebalancing which estimates the probability of a bull or a bear market using 1-year trailing S&P 500 returns and historical transitional probabilities associated with bull and bear markets.
- d. TEST

2. CAAR utilizes a four step approach to portfolio rebalancing.

- a. Determine if rebalancing is appropriate based on a variety of triggering events tied to specific time periods and return parameters.
- b. If portfolio rebalancing is indicated, then new portfolio allocations are calculated using mean variance optimization, subject to specified portfolio constraints that are consistent with the client's personal investment objectives.
- c. Adjust the data time frame used by the strategy when optimizing the portfolio if there has been a recent change in market trends.
- d. Adjust the portfolio constraints that apply when calculating the updated model portfolio allocations if it appears that the stock market is entering a bear or bull market. (The restriction on the share of the portfolio that can be allocated to bonds will be raised in the case of a bear market, while the restriction on the percentage of the portfolio that can be allocated to stocks will be increased during a bull market.)

C. Step 3 - Harvest tax losses when appropriate.

This is accomplished by selling ETFs which have a significant unrealized loss, recognizing the loss, and reinvesting the sale proceeds in another ETF that is closely correlated (but not identical) to the security that has been sold.

D. Step 4 - Evaluate and implement appropriate option hedging strategies to provide insurance against large draw downs attributable to sudden declines in portfolio values.

- 1. Monitor a variety of market indicators in an effort to identify elevated risk of market bubbles.
- 2. Monitor economic indicators that could indicate increasing risk of a U.S. recession.
- 3. Utilize various option strategies to provide protection against draw downs should a market bubble burst or a domestic economic recession occur.

***Tax Considerations***

Helping assure our clients do not incur unnecessary capital gain taxes is an important component of our investment strategy. This is accomplished by limiting trading activity, and harvesting capital losses. Harvesting capital losses refers to the practice of selling investments that have a significant unrealized loss, recognizing the loss, and reinvesting the sale proceeds in another investment that is very similar (but not identical) to the investment that was sold. This strategy allows our clients to recognize the loss embedded in the security which is being sold, while maintaining his or her exposure to the asset class the sold security represented. The loss can then be used to offset gains that might be realized when selling an appreciated security as dictated by the need to rebalance, as explained above.

Our strategies and investment advice may have unique and significant tax implications. These ramifications are taken into account by us as part of our investment advice. However, unless we specifically agree in writing to the contrary, tax efficiency is not our primary consideration in the management of your assets. Regardless of your account size or any other factors, we strongly recommend that you continuously consult with a tax professional prior to and throughout the investing of your assets.



Custodians and broker-dealers are required to report the cost basis of equities acquired in client accounts. Our Firm uses the "Specific Identification" accounting method for calculating the cost basis of your investments. You are responsible for contacting your tax advisor to determine if this accounting method is the right choice for you. If your tax advisor believes another accounting method is more advantageous, please provide written notice to our Firm immediately and we will alert your account custodian of your individually selected accounting method. Please note that decisions about cost basis accounting methods will need to be made before trades settle, as the cost basis method cannot be changed after settlement.

### **Risk of Loss**

Investing in securities involves risk of loss that you should be prepared to bear. We do not represent or guarantee that our services or methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines. We cannot offer any guarantees or promises that your financial goals and objectives will be met. Past performance is in no way an indication of future performance.

### **Recommendation of Particular Types of Securities**

As disclosed under the "Advisory Business" section in this Brochure, we recommend that our clients invest primarily in index based exchanged traded funds (ETFs). However, we may recommend other types of investments as we deem appropriate since each client has different needs and a different tolerance for risk. Each type of security has its own unique set of risks associated with it and it would not be possible to list here all of the specific risks of every type of investment. Even within the same type of investment, risks can vary widely. However, in very general terms, the higher the anticipated return of an investment, the higher the risk of loss associated with it.

The unique risk involved with utilizing ETFs pertains to liquidity and depth of market. Because ETFs trade on listed stock exchanges, very large orders could potentially affect market prices. We therefore avoid entering large trades as market orders. In addition, ETF market prices may differ from the underlying net asset value of the basket of securities the ETF tracks. Research into the pricing of ETFs has generally concluded that any discrepancy is minor in amount and usually only lasts for a short period of time. The risk of pricing errors is much higher in funds that do not trade regularly, such as certain foreign ETFs. Finally, ETFs utilizing derivatives may not always accurately track the index they are pegged to. This is particularly true with respect to commodity based ETFs if contango is affecting the price of the commodity it tracks.

## **Item 9 Disciplinary Information**

We have been providing investment advisory services since 2004, formerly under the name of Willms, S.C. and since January 20, 2010 as Estate Counselors, LLC. Neither our firm nor any of our management persons has any reportable disciplinary information.

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

We are affiliated with Willms S.C. law firm through common control and ownership. If you require legal services, we may recommend that you use Willms S.C. law firm. Our advisory services are separate and distinct from the compensation paid to Willms S.C. law firm for their services.

Communications between Estate Counselors, LLC and its clients are not covered by the attorney-client privilege, and as a result may be discoverable by third parties. All such communications are, however, covered by Estate Counselors, LLC's privacy policy, a copy of which is available upon request.

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

### **Description of Our Code of Ethics**

We strive to comply with applicable laws and regulations governing our practices. Therefore, our Code of Ethics includes guidelines for professional standards of conduct for our Associated Persons. Our goal is to protect your interests at all times and to demonstrate our commitment to our fiduciary duties of honesty, good faith, and fair dealing with you. All of our Associated Persons are expected to adhere strictly to these guidelines. Our Code of Ethics also requires that certain persons associated with our Firm submit reports of their personal account securities holdings and transactions to a qualified representative of our Firm who will review these reports on a periodic basis. Persons associated with our Firm are also required to report any violations of our Code of Ethics. Additionally, we maintain and enforce written policies reasonably designed to prevent the misuse or dissemination of material, non-public information about you or your account holdings by persons associated with our Firm.

Our Code of Ethics is available to you upon request. You may obtain a copy of our Code of Ethics by contacting Andrew J. Willms at (262) 238-6996 or [firm@estatecounselors.com](mailto:firm@estatecounselors.com).

### **Participation or Interest in Client Transactions**

Neither our Firm nor any of our Associated Persons has any material financial interest in client transactions beyond the provision of portfolio advisory services as disclosed in this Brochure.

### **Personal Trading Practices**

Our Firm or Associated Persons may buy or sell the same securities that we recommend to you or securities in which you are already invested. A conflict of interest exists in such cases because we have the ability to trade ahead of you and potentially receive more favorable prices than you will receive. To eliminate this conflict of interest, it is our policy that Associated Persons shall not have priority over your account in the purchase or sale of securities.

## **Item 12 Brokerage Practices**

Client investments are held at the custodian who serves as a broker-dealer of the account. The broker-dealer is also responsible for executing trades and provides clients with trade confirmations and monthly statements.

We have chosen Fidelity Brokerage Services, LLC as our primary broker-dealer. We believe that Fidelity provides quality execution services for our clients at competitive prices. Price is not the sole factor we consider in evaluating best execution. We also consider the quality of the brokerage services provided by Fidelity, including the value of research provided, the Firm's reputation, execution capabilities, commission rates, and responsiveness to our clients and our Firm's needs. We also use Piper Jaffray & Co. as a broker-dealer in instances where they are able to provide us more favorable pricing on bond transactions. We reserve the right to change broker-dealers and/or custodians. However, we will not relocate your account to a different broker-dealer or custodian without your consent in advance of the change.

In limited circumstances, and at our discretion, some clients may instruct our Firm to use one or more particular brokers for the transactions in their accounts. If you choose to direct our Firm to use a particular broker, you should understand that this might prevent us from effectively negotiating brokerage commissions on your behalf. This practice may also prevent our Firm from obtaining favorable net execution prices. Thus, when directing brokerage business, you should consider whether the commission expenses, execution, clearance, and settlement capabilities that you will obtain

through your chosen broker are adequately favorable in comparison to those that we would otherwise obtain for you. If you choose to direct our Firm to use a particular broker it may also adversely affect our ability to provide you with the detailed reports we normally provide to our clients.

### **Block Trades**

We may combine multiple orders for shares of the same securities purchased for advisory accounts we manage (this practice is commonly referred to as "block trading"). We will then distribute a portion of the shares to participating accounts in a fair and equitable manner. The distribution of the shares purchased is typically proportionate to the size and investment objectives of the account, but it is not based on account performance or the amount or structure of management fees. Subject to our discretion regarding factual and market conditions, when we combine orders, each participating account pays an average price per share for all transactions and pays a transaction charge. Accounts owned by our Firm or persons associated with our Firm may participate in block trading with your accounts; however, they will not be given preferential treatment.

## **Item 13 Review of Accounts**

Andrew J. Willms, Managing Member and Chief Compliance Officer of Estate Counselors, LLC monitors your accounts on a regular basis. Account reviews will be conducted at least monthly. The reviews are conducted to ensure the advisory services provided to clients and the portfolio mix is consistent with the client's current investment needs and objectives. Additional reviews may be conducted based on various circumstances, including, but not limited to:

- contributions and withdrawals,
- year-end tax planning,
- market moving events,
- security specific events, and/or,
- changes in your risk/return objectives.

We will provide you with a monthly status report that details your account activity and performance. Unless you request otherwise, you will also receive a more extensive annual report from us that details your account's activity and performance during the calendar year. You will receive trade confirmations and monthly statements from your account custodian(s). You should compare our reports with the statements from your account custodian(s) to reconcile the information reflected on each statement. If you have a question regarding your account statement or if you did not receive a statement from your custodian, please contact us at (262) 238-6996 or [firm@estatecounselors.com](mailto:firm@estatecounselors.com).

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

We do not receive any compensation from any third party in connection with providing investment advice to you, nor do we compensate any individual or firm for client referrals. Nor do we receive client referrals from broker-dealers in exchange for cash or other compensation.

## Item 15 Custody

Your funds and securities will be held with Fidelity or other qualified custodian. You will receive account statements from the custodian(s) holding your funds and securities each month. The account statements from your custodian(s) will indicate the amount of our advisory fees deducted from your account(s) each billing period. You should carefully review account statements for accuracy. Our monthly status reports will also reflect the amount of advisory fees deducted from your account. You will also be able to review your account online.

Notwithstanding the foregoing, because we, upon your approval, directly debit your account(s) for the payment of our advisory fees, our Firm has limited custody over your funds or securities. We do not, however, have physical custody of any of your funds and/or securities.

## Item 16 Investment Discretion

Before we can manage your investments, you must first sign our Investment Management Agreement. Under the terms of this Agreement, you may select any one of the following alternatives:

### *Option 1. Non-Discretionary Investment Authority*

If you select this option then we shall make such recommendations to you as to the retention, disposition, investment, and reinvestment of your account as we consider advisable, but no investment action shall be taken without your approval; provided, however, that we may, in our sole discretion and without your approval, temporarily invest income and principal cash in short term money market funds and similar short term instruments.

### *Option 2. Limited Discretionary Investment Authority*

If you select this option then we are authorized, without your prior consultation, to buy, sell, and trade in stocks, bonds, mutual funds, index funds, exchange traded funds, and other securities and/or contracts relating to the same ("Securities"), when we deem necessary to either (i) maintain an asset allocation that is consistent with the model portfolio that was approved by you, or (ii) take advantage of an opportunity to harvest capital losses in securities that have declined in value since their acquisition, and to give instructions in furtherance of such trading authority to the broker-dealer of the account and the custodian of the assets. Limited discretionary investment authority precludes us from taking other actions on your behalf without your prior written approval.

### *Option 3. Full Investment Authority*

If you select this option then you appoint us as your attorney-in-fact and grant us limited power-of-attorney and trading authority over your account with discretionary authority to buy, sell, or otherwise effect investment transactions involving the assets. Full Investment Authority grants our Firm the discretion to manage your account including the selection of specific securities, and the amount of securities, to be purchased or sold for your account without the need to obtain your approval prior to each transaction. Discretionary authority can be authorized by an investment advisory agreement you sign with our Firm, a limited power of attorney, or trading authorization forms.

Regardless of which of the foregoing options is selected, your portfolio will be managed in a manner that is consistent with an Investment Policy Statement that will be given to you at the commencement of our engagement. Your Investment Policy Statement will set forth our understanding of your long-term investment objectives, and the investments we are recommending for you in light thereof.

## Item 17 Voting Client Securities

### Proxy Voting

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

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

## Item 18 Financial Information

We are not required to provide financial information to our clients because we do not:

- require the prepayment of more than \$1,200 in fees and six or more months in advance, or
- take custody of client funds or securities, or
- have a financial condition that is reasonably likely to impair our ability to meet our commitments to you.

## Item 19 Requirements for State Registered Advisors

Estate Counselors, LLC is SEC registered.

## Item 20 Additional Information

### Your Privacy

We view protecting your private information as a top priority. Pursuant to applicable privacy requirements, we have instituted policies and procedures to ensure that we keep your personal information private and secure.

We do not disclose any non-public personal information about you to any non-affiliated third parties, except as permitted by law. In the course of servicing your account, we may share some information with our service providers, such as transfer agents, custodians, broker-dealers, accountants, consultants, and attorneys.

We restrict internal access to non-public personal information about you to employees, who need that information in order to provide products or services to you. We maintain physical and procedural safeguards that comply with regulatory standards to guard your non-public personal information and to ensure our integrity and confidentiality. We will never sell information about you or your accounts to anyone. We do not share your information unless it is required to process a transaction, at your request, or required by law.

You will receive a copy of our privacy policy notice prior to or at the time you sign an advisory agreement with our Firm. Thereafter, we will deliver a copy of the current privacy policy notice to you on an annual basis. Please contact Andrew J. Willms at (262) 238-6996 or [firm@estatecounselors.com](mailto:firm@estatecounselors.com), if you have any questions regarding this policy.

**Trade Errors**

In the event a trading error occurs in your account, our policy is to restore your account to the position it should have been in had the trading error not occurred. Depending on the circumstances, corrective actions may include canceling the trade, adjusting an allocation, and/or reimbursing the account. If a trade error results in a profit, you will keep the profit.