

**Asset Advisory Group, Inc.  
170 Kinnelon Road  
Suite 3  
Kinnelon, New Jersey 07405**

**Phone: 973-492-0808  
Fax: 973-492-1166  
Web Site: [www.assetadvisorygroup.com](http://www.assetadvisorygroup.com)**

**February 2, 2024**

**FORM ADV PART 2A.  
BROCHURE**

**This brochure provides information about the qualifications and business practices of Asset Advisory Group, Inc. If you have any questions about the contents of this brochure, please contact us at 973-492-0808. 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 Asset Advisory Group, Inc. is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The searchable IARD/CRD number for Asset Advisory Group, Inc. is 106618.**

**Asset Advisory Group, Inc. is a Registered Investment Adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.**

**ITEM 2: MATERIAL CHANGES: As of the firm's last filing dated March 2, 2023, there have been no material changes to report.**

### **Item 3 - Table of Contents**

<i>Item 4 - Advisory Business.....</i>	<i>1</i>
<i>Item 5 - Fees and Compensation.....</i>	<i>3</i>
<i>Item 6 - Performance-Based Fees and Side-By-Side Management .....</i>	<i>3</i>
<i>Item 7 - Types of Clients .....</i>	<i>3</i>
<i>Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss .....</i>	<i>3</i>
<i>Item 9 - Disciplinary Information .....</i>	<i>4</i>
<i>Item 10 - Other Financial Industry Activities and Affiliations .....</i>	<i>4</i>
<i>Item 11 - Code of Ethics, Participation or Interest in Client Transactions and Personal Trading .....</i>	<i>5</i>
<i>Item 12 - Brokerage Practices.....</i>	<i>6</i>
<i>Item 13 - Review of Accounts.....</i>	<i>7</i>
<i>Item 14 - Client Referrals and Other Compensation.....</i>	<i>8</i>
<i>Item 15 - Custody .....</i>	<i>8</i>
<i>Item 16 - Investment Discretion .....</i>	<i>8</i>
<i>Item 17 - Voting Client Securities .....</i>	<i>9</i>
<i>Item 18 - Financial Information .....</i>	<i>9</i>

#### *Item 4 - Advisory Business*

The U.S. Securities and Exchange Commission granted Asset Advisory Group, Inc.'s registration on April 26, 2000. Paul Bernard Zoch, CFP® (CRD Number 727907) is President and Chief Compliance Officer of the firm. As of January 2024, Mr. Zoch owns sixty-five (65%) percent and Amanda Z. McGrath, CFP® owns thirty five (35%) percent of the equity of the firm. The firm is not publicly owned or traded. There are no indirect owners of the firm or intermediaries who have any ownership interest in the firm. The firm manages each client's portfolio on an individualized basis. Clients may impose restrictions on their accounts. The firm does not participate in wrap programs. As of December 31, 2023, the firm managed \$95,521,428 on a discretionary basis and \$278,566,421 on a nondiscretionary basis.

Firm offers to provide full and hourly service financial planning (including an annual update service) and asset management services. Financial planning advice will include advice on matters not involving securities. Our services are offered to individual and corporate clients. Our firm's financial planning advice includes, but is not limited to, oral advice, written analysis and reports and computer-generated analysis, all of which attempt to provide the client with a financial blueprint designed to achieve their stated financial goals and objectives. In general, a full-service client may receive a written plan which will address some or all of the following areas:

- a) Investment Planning
- b) Risk Management
- c) Tax Planning
- d) Budgeting and Emergency Fund Planning
- e) Retirement Planning
- f) Estate Planning
- g) College Educational Cost Planning

Required information will be gathered through personal interviews, client statements and related documents supplied by the client. Implementation is entirely at the client's discretion. However, it is noted that a recommendation in isolation may be counterproductive and should be discussed with the Firm prior to any client taking any such action.

#### FULL SERVICES FEE SCHEDULE

Financial planning services are provided on a fixed-fee basis. Fixed fees for full service generally range from \$1,500.00 to \$15,000.00 (hourly fees can also be arranged in certain circumstances). The fee is based upon the extent and complexity of each individual client's specific financial and/or personal circumstances. An exact fee will be agreed upon in advance. Unless altered by negotiation, fifty (50%) percent of the agreed upon fee is due and payable upon execution of the Advisory Agreement. The balance of such fees shall be due and payable upon delivery of the financial plan or financial advice.

All financial plans and reviews are usually delivered to a client within 90 days. However, it is noted that a client must deliver required information, in a timely manner, for us to perform our duties.

#### ANNUAL PLAN UPDATE

In subsequent years, any client may elect to receive an update to the original financial plan and an additional year of consultation. The fee for this service will be quoted and adjusted prior to contract execution. This fee is due and payable upon presentation of the updated plan.

## ASSET MANAGEMENT SERVICES

Our firm also provides non-discretionary/discretionary asset management services on a continuous basis. Clients contracting for this service will receive investment advice designed to meet their long-term investment goals.

Our firm will first define the specific client objectives, and then structure advice to meet those needs and objectives. Dependent upon varying client needs, recommendations may range from total fixed income to total equity, with risk parameters varying from conservative to aggressive.

The aim of the service is to preserve and enhance the purchasing power of capital over an extended time, based upon specific client objectives.

## ASSET MANAGEMENT FEE SCHEDULE

Asset management fees for non-discretionary/discretionary accounts are based upon the dollar value of each portfolio(s) or can be a fixed flat charge. Clients will be invoiced, in advance, on a quarterly basis.

Annual fees range from 0.25% to 1.00% of a client's assets under management irrespective of whether such management is performed on a discretionary basis or a nondiscretionary basis.

Firm may debit advisory fees directly from the client account. It is disclosed that (1) the advisory client provides a written authorization permitting the adviser's fees to be paid directly from the client's account held by an independent custodian or trustee; (2) the adviser sends to the client a bill showing the amount of the fee, the value of the client's assets on which the fee was calculated; and (3) the custodian or trustee agrees to send to the client a statement, at least quarterly, indicating all amounts disbursed from the account including the amount of advisory fees paid directly to the adviser.

It should be noted that all of the above-stated percentage fee standards are negotiable and that these stated percentages are to be used as general guidelines only.

Firm does not accept commissions or 12b-1 fees as compensation for investment advisory activities. Firm is compensated on a fee-only basis for these services.

It should be noted that mutual funds pay advisory fees to their investment advisers and such fees are therefore indirectly charged to all holders of mutual fund shares. Clients with mutual funds in their portfolios are effectively paying both the Firm and the mutual fund adviser for the management of their assets. Clients who place mutual fund shares under the Firm's management are therefore subject to both the Firm's direct management fee and the indirect management fee of the mutual fund's adviser.

## HOURLY CONSULTATION SERVICES

Clients not in need of our full-services financial planning can receive investment or financial planning advice on a more limited basis. In this case, Firm will provide periodic advice on all or part of the above-listed areas of concern. This service is designed for clients who may not need or require full-service advice and includes the rendering of oral advice by the Firm or a single written analysis or report on a specific topic(s), such as estate, retirement, education, tax planning, investment planning or any one or more limited areas of interest.

Firm's services include advice on non-securities matters. This can be in connection with providing financial planning services which relates to the rendering of advice on estate planning, tax planning, cash flow, investment planning or strategic planning.

LIMITED SERVICES.....HOURLY SCHEDULE

Services provided on an hourly basis are computed at a maximum rate of \$750.00 per hour for principal and/or other associates. Staff's professional time is billed out at a rate of \$50.00 per hour. One hour of professional time is payable upon signing the Contract. Additional hours will be invoiced as incurred. Fees are due and payable within 30 days of the invoice date.

TERMINATION POLICY

Any financial or advisory agreement may be canceled at any time by either party for any reason, upon receipt of written notice. At that time, all prepaid, unearned fees will be promptly refunded. In the event that a client cancels the agreement within five (5) business days of the initial engagement, Firm will make a full refund. The termination policy is not negotiable; however, in isolated cases, based upon unique circumstances and/or relationships, the fee may be waived in whole or in part at the discretion of Firm.

Firm does not base his fees on the capital gains or the capital appreciation of any funds or any part of any funds of any client.

Firm on occasion may sponsor seminars for educational purposes, which treat various financial planning topics. No client pays any form of fee in order to attend such seminars.

***Item 5 - Fees and Compensation***

See Item 4, above.

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

None.

***Item 7 - Types of Clients***

Individuals, pension plans, profit sharing plans, trusts, estates, charitable organizations, corporations and other business entities. We have no minimum account size requirement.

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

Method of securities analysis: fundamental analysis and technical analysis as well as the use of Morningstar, Valueline, S&P Research, Charles Schwab Institution Research, and other miscellaneous services.

Investment strategies may include: long-term purchases (securities held at least a year), short term purchases (securities sold within a year), short sales, trading, margin transactions, option writing. Also, investment advice and recommendations will be based on our own inputs as well as those of outside professionals, if required. Firm will also attend seminars and educational programs throughout the year. As a rule, recommendations

made are all based on a long-term investment strategy. However, in certain cases, advice may be designed to meet a client's short-term needs, such as monthly expenses.

With respect to mutual fund investments, Firm usually recommends the "Dollar Cost Average" method for no-load mutual funds.

**All investing strategies we offer involve risk and may result in a loss of your original investment.**

Equity/Stock Mutual Funds are only for those dollars that have a long-time horizon and are willing to accept a reasonable amount of annual fluctuation and an occasional year of negative returns. Also, Mutual Funds, Individual stocks, and ETF's are not guaranteed and prior performance of different asset classes are no guarantee of future performance.

**Risks Associated with Securities**

**Common stocks** may go up and down in price quite dramatically, and in the event of an issuer's bankruptcy or restructuring could lose all value. A slower-growth or recessionary economic environment could have an adverse effect on the price of all stocks.

**Municipal Bonds** are debt obligations generally issued to obtain funds for various public purposes, including the construction of public facilities. Municipal bonds pay a lower rate of return than most other types of bonds. However, because of a municipal bond's tax-favored status, investors should compare the relative after-tax return to the after-tax return of other bonds, depending on the investor's tax bracket. Investing in municipal bonds carries the same general risks as investing in bonds in general. Those risks include interest rate risk, reinvestment risk, inflation risk, market risk, call or redemption risk, credit risk, and liquidity and valuation risk.

**Investment Companies Risk.** When a client invests in open end mutual funds or ETFs, the client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. In addition, the client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives). ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value; (ii) the ETF may employ an investment strategy that utilizes high leverage ratios; or (iii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. The Adviser has no control over the risks taken by the underlying funds in which clients invest.

***Item 9 - Disciplinary Information***

None.

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

Paul Zoch is licensed to sell life and health insurance products and such activities may cause potential conflicts of interest. Paul Zoch insurance license is held strictly for advisory purposes.

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

The firm has adopted a written Code of Ethics in compliance with SEC rule 204A-1. The code sets forth standards of conduct and required compliance with federal securities laws. We will provide a copy of our Code of Ethics to any client or prospective client upon request. From time to time, the adviser may have an interest or position in a certain security (ies) which may also be recommended to a client. As the above-stated situation represents a conflict of interest, Firm has established the following restrictions so as not to compromise its fiduciary responsibilities:

- 1) Securities holdings of Firm or other employee(s) will be fully disclosed to any client contemplating a similar transaction;
- 2) Firm maintains a list of all securities holdings for itself and for anyone associated with its planning practice. These holdings are reviewed on a regular basis by Paul B. Zoch and/or Amanda Zoch McGrath;
- 3) Firm emphasizes the unrestricted right of a client to decline to implement any advice rendered;
- 4) Firm emphasizes the unrestricted right of the client to select and choose any broker or dealer, and/or insurance company (s) he wishes;
- 5) Firm will endeavor to act in accordance with all applicable federal and state regulations governing registered investment advisory practices;
- 6) Any individual not in observance of the above may be subject to termination.

#### **Investment Advice Relating to Retirement Accounts**

When we provide investment advice regarding retirement plan accounts or individual retirement accounts, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with client interests, so we operate under a special rule that requires us to act in clients' best interest and not put our interest ahead of clients. Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of clients when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in clients' best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

In addition, and as required by this rule, we provide information regarding the services that we provide, and any material conflicts of interest, in this brochure and in the client agreement.

## *Item 12 - Brokerage Practices*

Some clients, when undertaking an advisory relationship, may already have their own broker(s) and will instruct Firm to execute all transactions through same. Firm will try to honor these requests. However, it is noted that adviser is unable to negotiate commissions and that the client account may not be included in block trades.

As a practical matter, AAG executes the majority of its trades through Charles Schwab Institutional. Asset Advisory Group (AAG) manages portfolios on a non-discretionary/discretionary basis and transacts mostly mutual fund investments/ETFs for the majority of its clients. Mutual funds are bought and sold at closing NAV's (net asset value). AAG does have a fiduciary and fundamental duty to seek best execution for client transactions and, on a semi-annual basis, reviews Schwab's routing of orders in listed equities, OTC equities and listed options. AAG also semi-annually reviews the routing destination and execution of orders placed for their clients. AAG has reviewed Charles Schwab Best Execution Policy, Order Routing and Execution. All reports are available to clients upon request. Thus, we have been suggesting the use of Charles Schwab Institutional broker/dealer. However, as previously stated, no client is under any obligation to effect security transactions through any recommended broker or dealer. All clients are free to select any broker or dealer of his or her choice. Firm has the ability to trade securities through many broker houses and domicile the securities at Charles Schwab & Co. utilizing a prime broker relationship that is formed by Charles Schwab & Co. and approved by clients with a signed form that explains the newly established relationship. Broker houses will be chosen to execute trades based upon the overall quality, cost and execution.

AAG does not vote proxy statements on behalf of clients.

On occasion, Firm may consolidate or "bunch" certain securities into the master account so that these trades may be effectuated in an administratively and cost-efficient manner. Such trades shall then be allocated among the specific advisory clients involved.

AAG establishes brokerage accounts with the Schwab Institutional division of Charles Schwab & Co., Inc. (Schwab), a registered broker-dealer, Member SIPC, to maintain custody of clients' assets and to effect trades for their accounts. AAG is independently owned and operated and not affiliated with Schwab. Schwab Institutional provides AAG with access to its institutional trading and custody services, which are typically not available to Schwab retail investors. These services generally are available to independent investment advisors on an unsolicited basis, at no charge to them so long as a total of at least \$10 million of the advisor's clients' account assets are maintained in accounts at Schwab Institutional and are not otherwise contingent upon AAG's committing to Schwab Institutional any specific amount of business (assets in custody or trading). Schwab Institutional's services include research, brokerage, custody, access to mutual funds and other investments that are otherwise available only to institutional investors or would require a significantly higher minimum initial investment.

For AAG's client accounts maintained at Charles Schwab & Co., Inc., Schwab generally does not charge separately for custody but is compensated by account holders through commissions or other transaction-related fees for securities trades that are executed through Schwab or that settle into Schwab accounts.

Schwab Institutional also makes available to AAG other products and services that benefit AAG, but may not benefit its clients' accounts. Some of these other products and services assist AAG in managing and administering client's accounts. These include software and other technology that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts), provide research, pricing information and other market data, facilitate payment of AAG's fees from its clients' accounts, and assist with back-office function, record keeping and client reporting. Many of these services generally may be used to service all or a substantial



number of AAG's accounts, including accounts not maintained at Schwab Institutional. Schwab Institutional may also provide AAG with other services intended to help AAG manage and further develop its business enterprise. These services may include consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, and marketing. In addition, Schwab may make available, arrange and/or pay for these types of services rendered to AAG by independent third-parties. Schwab Institutional may discount or waive fees it would otherwise charge for some of these services or pay all or part of the fees of a third-party providing these services to AAG. AAG endeavors to act in its clients best interests, and AAG's recommendation that clients maintain their assets in accounts at Schwab may be based in part on the benefit to AAG's of the availability of some of the foregoing products and services and not solely on the nature, cost or quality of custody and brokerage services provided by Schwab, which may create a potential conflict of interest. The availability to AAG of the foregoing products and services is not contingent upon AAG committing to Schwab Institutional any specific amount of business assets in custody or trading.

The benefits received through participation in the SI program do not depend upon the amount of transactions directed to Charles Schwab & Co., Inc.

### **Aggregating (Block) Trading for Multiple Client Accounts**

Generally, we 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 of the account, but it is not based on account performance or the amount or structure of management fees. Subject to our discretion, regarding particular circumstances and market conditions, when we combine orders, each participating account pays an average price per share for all transactions and pays a proportionate share of all transaction costs. 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***

Full-service and limited-service financial planning clients may contract for an annual update. This review can encompass current tax and cash flow studies, investment recommendations, tax planning recommendations, insurance and estate planning recommendations and all other applicable topics. Any client may request additional items to be reviewed and/or request special projects. Paul B. Zoch and/or Amanda Zoch McGrath reviews all accounts. With respect to asset management services, the review process is continuous and on going with formal quarterly reports to clients.

Asset Management clients receive regular monthly, or quarterly if no activity, brokerage statements. Asset Advisory Group sends quarterly reports with billing and annual performance reports to all clients. Clients can request weekly reports or any frequency they wish. Client meetings vary depending upon individual client needs. Clients can request meetings at any time.

Full-service and limited-service financial planning clients will receive an update upon request, and the frequency of meetings for a financial planning client will depend upon each individual client.

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

AAG does not receive compensation for client referral arrangements. With respect to other compensation/benefits received from Charles Schwab & Co., Inc., see item 12, above.

#### ***Item 15 - Custody***

AAG is deemed to have limited custody solely with its ability to withdraw fees from clients' accounts and standing letters of authorization, discussed below. Clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. We urge you to carefully review such statements and compare such official custodial records to the account statements or reports that we may provide to you. Our statements or reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Standing Letters of Authorization: AAG does maintain a standing letter of authorization (SLOA) where funds or securities are being sent to a third party, and the following conditions are met:

- The client provides an instruction to the qualified custodian, in writing, that includes the client's signature, the third party's name, and either the third party's address or the third party's account number at a custodian to which the transfer should be directed.
- The client authorizes AAG, in writing, either on the qualified custodian's form or separately, to direct transfers to the third party either on a specified schedule or from time to time.
- The client's qualified custodian performs appropriate verification of the instruction, such as a signature review or other method to verify the client's authorization and provides a transfer of funds notice to the client promptly after each transfer.
- The client has the ability to terminate or change the instruction to the client's qualified custodian.
- AAG has no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party contained in the client's instruction.
- The client's qualified custodian sends the client, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.
- AAG maintains records showing that the third party is not a related party of AAG or located at the same address as AAG.

#### ***Item 16 - Investment Discretion***

Client portfolios may be managed on either a discretionary basis or on a nondiscretionary basis. For those portfolios managed on a discretionary basis, we maintain discretion over client accounts with respect to securities to be bought and sold and the amount of securities to be bought and sold. Investment discretion is explained to clients in detail when an advisory relationship has commenced. At the start of the advisory relationship, the client will execute a Limited Power of Attorney, which will grant our firm discretion over the account. Additionally, the discretionary relationship will be outlined in the advisory contract and signed by the client. Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors.

### ***Item 17 - Voting Client Securities***

Firm does not vote proxy statements on behalf of advisory clients. For those client accounts where we maintain discretion over client accounts with respect to securities to be bought and sold and the amount of securities to be bought and sold, investment discretion is explained to clients in detail when an advisory relationship has commenced. At the start of the advisory relationship, the client will execute a Limited Power of Attorney, which will grant our firm discretion over the account. Additionally, the discretionary relationship will be outlined in the advisory contract and signed by the client. Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors.

### ***Item 18 - Financial Information***

Registered Investment Advisers are required in this Item to provide you with certain financial information or disclosures about our financial condition. We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to clients, and we have not been the subject of a bankruptcy proceeding. We do not have custody of client funds or securities nor do not require the prepayment of fees of more than \$1,200 six months or more in advance.