



March 1, 2019

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This Brochure contains information about the qualifications, investment processes and business practices of Epoch Consulting Group. If you have any questions about the contents of this Brochure, please contact us at one of the telephone numbers and/or our email address shown above. 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.

Epoch Consulting Group is a registered investment advisor. Registration of an Investment Advisor does not imply any level of skill or training. The oral and written communications of an Advisor provide you with information for use in determining whether to hire or retain an Advisor.

Additional information about Epoch Consulting Group is also available at www.adviserinfo.sec.gov.

Summary of Material Changes

There have been no material changes to our Brochure since the last revision on March 1, 2018.

As a registered investment advisor, Epoch Consulting Group is required to provide to you annually within 120 days of our fiscal year-end either a document that summarizes material changes at the firm, or our full Brochure.

Under federal and state law, we are a fiduciary and must make full disclosure to you of all material facts relating to the advisory relationship. As a fiduciary, we seek to avoid conflicts of interest with you, and, at a minimum, make full disclosure of all material conflicts of interest between our firm and you that could affect the advisory relationship.

Epoch Consulting Group serves three distinct clients: (1) ERISA retirement plans (sponsored by profit and non-profit organizations); (2) non-qualified executive compensation plans (sponsored by profit and non-profit organizations); and (3) private wealth management for individuals and institutions. Our Brochure contains information on our services, fees, conflicts-of-interest (if any), business qualifications, and business practices. As a client of Epoch, you received a copy of our Brochure at the start of the advisor/client relationship. If you would like another copy, please contact Yvette Clark at (707) 524-5800 or email her at: yclark@epochcg.com.

Additional information about Epoch Consulting Group is also available on the SEC's website at www.adviserinfo.sec.gov. The SEC's website also provides information about any persons affiliated with Epoch Consulting Group who are registered, or are required to be registered, as investment advisor representatives of Epoch Consulting Group.

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Item 4 – Epoch’s Business

Epoch Consulting Group is registered as an investment advisor with the United States Securities and Exchange Commission. Our primary business is providing Pension Consulting services to retirement plans (profit, non-profit and executive compensation), and private wealth management services to individuals and institutions. The firm was founded in 2004.

We are independent and objective. Epoch is independently owned and managed by Rick L. Tasker. We are not affiliated with any other Advisory firm, broker-dealer, mutual fund complex, bank, pension administrator or recordkeeper. Our advice is objective. We do not offer proprietary products and we are compensated only from the fees we charge and collect from our clients. We earn no commissions and have no soft-dollar arrangements with any financial institution.

Pension Consulting Services are provided to employer sponsored retirement plans for both profit and non-profit organizations. We service defined contribution (e.g., 401(k), profit sharing, and money purchase pension), defined benefit, 403(b), 457, 401(a) and executive deferred compensation plans. We provide both fiduciary and non-fiduciary services, which we clearly identify in our service contracts with you. Fiduciary services generally include: IPS development and/or review; investment selection and monitoring; recommendations for model portfolio allocations & rebalancing; and participant investment advice. Non-fiduciary services typically include: plan design consulting and/or review; vendor search and fee benchmarking services; fiduciary education/training & compliance assistance; and participant investment education and enrollment support. Epoch does not serve as a 3(38) discretionary fiduciary to ERISA covered employee benefit plans.

We primarily serve four key areas of plan management and operation:

Fiduciary Risk Management

- Regulatory and compliance updates
- Committee guidance
- Monitoring of fiduciary risks
- Fiduciary training
- Establishment of prudent process

Investment Selection and Monitoring

- Investment selection
- Investment monitoring
- Committee attendance
- Investment Policy Statement
- Education Policy Statement

Participant Education and Enrollment

- Model portfolio strategies
- Participant education and advice
- Monthly and quarterly newsletters
- Enrollment support

Vendor Management

- Plan fiduciary reviews
- Plan fees and expense analysis
- Plan design assistance
- Fee benchmarking
- Vendor searches (RFPs & RFIs)

Epoch serves as a 3(21) fiduciary on the fiduciary services provided. We have no financial relationship with any service provider and we receive no direct or indirect compensation in connection with such services. Fees for services are paid solely by the client. See (Item 5 – Fees and Compensation) for our Fee Schedule. We work with regional and national service providers and support both “bundled” and un-bundled” platforms. Clients are located throughout the United States and there is no minimum account size.

Total pension assets we consult on were \$533,043,000 as of December 31, 2018.

Item 4 – Epoch’s Business | *(continued)*

Private Wealth Management Services are provided to individuals, corporations, and non-profit organizations.

Non-Discretionary Services

We provide access to a full range of investment solutions to meet our clients’ financial objectives and risk profiles. We manage taxable and non-taxable accounts, providing customized portfolios that leverage the expertise of outside investment managers as well as defined asset allocation strategies, ongoing investment manager research, and portfolio monitoring. The types of investment vehicles we typically utilize in our portfolios include: no-load mutual funds; exchange traded funds (ETFs); and individual stocks and bonds. The types of investment profiles we manage range from “aggressive growth” to “capital preservation”. Our services generally include:

- Determining investment goals and objectives
- Developing investment strategy
- Determining suitability of investment vehicles
- Developing asset allocation strategy
- Implementing investment strategy
- Selecting investment managers
- Monitoring of investment managers
- Assessing the performance of the account
- Ongoing client communication
- Quarterly performance reports

We do not generally engage in market-timing nor do we provide investment-timing services. We do provide quarterly performance reports and market updates. Market updates are not regularly scheduled and may be given more or less frequently, depending upon the relevance of events in the economic, political, and specific market areas affecting our clients’ portfolios.

We do not maintain custody of your assets. Advisory fees are paid quarterly and clients may grant us authority to deduct our fees directly from their account(s). Clients receive an invoice prior to any advisory fee being deducted from their account(s).

Our services are customized for each client and you may impose restrictions on the types of securities, amount, industries, countries, etc. we place in your account. We try to use lower cost institutional no-load mutual funds whenever possible which are not typically available to retail investors. **Non-Discretionary assets managed by Epoch were \$11,036,000 as of December 31, 2018.**

Epoch may recommend and/or require that clients establish an account with Schwab Advisor Services, a division of Charles Schwab & Co., Inc. – a registered broker-dealer, member SIPC, to maintain custody of assets and to effect trades for your account(s). Epoch is not affiliated with Schwab. See (Item 12 – Brokerage Practices) for information on our relationship with recommended broker-dealers and custodians.

Discretionary Services and Use of Sub-Advisors

Epoch may utilize sub-advisory services offered by third-parties in managing discretionary assets. The sub-advisors provide access to a wide variety of investment management solutions, ranging from “aggressive growth” to “capital preservation”. These platforms generally utilize no-load mutual funds, ETFs, and alternative investments. Sub-advisors assist us in conducting due diligence on portfolio managers, administering accounts, managing trading, providing daily reconciliation of trading activity, providing online account information, creating and issuing quarterly performance reports, and other support services. The platforms include lower cost institutional no-load mutual funds, which is an advantage for clients who are unable to meet required investment minimums for institutional managers.

Item 4 – Epoch’s Business | *(continued)*

In utilizing sub-advisors to assist Epoch with the selection of portfolio managers, we furnish our clients with information on each recommended manager, including fees paid to sub-advisors and Epoch, and clients have the opportunity to approve, or disapprove, the selections. Clients may impose restrictions on the types of securities, amount, industries, countries, etc. for their account(s). Due to account minimums, some portfolio managers and alternative investments may only be available to our clients through sub-advisors.

Client assets are held at a broker-dealer or custodian available through the sub-advisor and approved by you. Portfolio managers typically direct all transactions in your account through the designated broker-dealer, but reserve the right to trade elsewhere in order to achieve best execution, obtain a wider variety of securities, and/or to take advantage of favorable mark-ups or mark-downs. Transactions through brokers other than the approved broker-dealer may result in additional commission or transaction charges.

Brokerage and custodial services are provided under separate agreements between you and the broker-dealer or custodian.

As of December 31, 2018, there were no Discretionary assets advised by Epoch, and no assets with any sub-advisor.

Epoch does not receive any commissions or transaction fees charged by broker-dealers or custodians. Mutual funds incur investment management fees and other expenses that are in addition to (and unrelated to) the advisory fees charged by Epoch. Where we engage the services of sub-advisors, their fee may increase the total fee paid by clients. See (Item 5 – Fees and Compensation) for information on fees.

Epoch understands the value you place on maintaining your privacy when it comes to financial matters. That is why we limit access to client information only to individuals in our organization who need it in order to perform their jobs. Employees who have access to client information are required to safeguard personal information and keep it confidential. We respect your privacy and have adopted a set of information management guidelines, which are the foundation of our client relationships. These guidelines have been developed with the recognition that industry “best practices” are constantly evolving. Accordingly, our guidelines are subject to change. Any such changes will immediately be brought to your attention before they are implemented.

In establishing an advisory account with Epoch, it is necessary that you provide us with certain personal financial information necessary to ensure that your account is managed in a manner consistent with your investment objectives, personal financial goals, and risk profile. The information we collect is contained in the firm’s Privacy Statement that is included with the documents you receive when engaging our services. The firm’s Privacy Statement is delivered to all clients annually, typically at year-end. In addition, you may request a copy of our Privacy Statement at any time by contacting us.

In addition to the information provided to Epoch, you will also be required to furnish certain information to the broker-dealer or custodian who holds your investment assets. That information is also kept confidential and is subject to Epoch’s Privacy Policy Statement and the privacy policies established at the broker-dealer or custodian. These third-party institutions are responsible for furnishing you with their own Privacy Policy Statements.

Item 5 – Fees and Compensation

All fees paid to Epoch are subject to negotiation. The specific amount and the manner in which fees are paid is established in a written agreement between our clients and Epoch.

Pension Consulting Services

The Department of Labor requires “**covered service providers**” who expect to receive \$1,000 or more in direct or indirect compensation for its services to make written disclosure of their services, fiduciary status, and compensation to the “**responsible plan fiduciaries**”.

Sections §408(b)(2) and §404(a)5 require disclosure of specific categories of information be provided to employers and plan participants, respectively. As a covered service provider, Epoch discloses any material changes to the information provided to responsible plan fiduciaries as soon as practicable, but no later than 60 days from the date of the material changes, unless precluded due to extraordinary circumstances beyond our control.

Fees paid to Epoch for Pension Consulting Services are charged either as a fixed fee, an asset-based fee, or a combination of both. We may also offer our services on a one-time or limited basis for an hourly fee at the rate of \$300/hour, or as a one-time “project-fee”. Our minimum fee is \$5,000 annually, which we may waive under certain circumstances. There is no minimum account value or plan size.

Fees are paid quarterly, in advance. Asset-based fees are based on the market value of the assets on the last day of the previous quarter. Our contract may be terminated by us or by you upon thirty (30) days' prior written notice. If you terminate the contract during the quarter for which we have received our quarterly fee in advance and there is more than 30 days remaining in the quarter, you are entitled to a refund of fees. The refund will be for the remaining days in the quarter that exceed the 30-day notice. If the 30-day notice extends beyond the last day of the quarter in which the termination notice is given by you, we agree to waive the 30-day notice and will not be entitled to a prorated portion of our quarterly fee beyond the end of the quarter.

If we terminate the contract during the quarter for which we have received our quarterly fee in advance, you are entitled to a prorated portion of the quarterly fee from the date we gave you our notice.

Our asset-based fees are:

Pension Consulting Fee Schedule

- First \$2,500,000 0.50%
- Next \$2,500,000 0.40%
- Next \$5,000,000 0.30%
- Next \$5,000,000 0.20%
- Next \$10,000,000 0.15%
- Next \$10,000,000 0.10%
- Over \$35 million Negotiable

Certain long-standing clients may have fee schedule arrangements substantially lower than the fee arrangements prevailing for other clients. We acknowledge that lower fees for comparable services may be available from others. Fees may be deducted from retirement plan assets or paid separately by the employer.

Item 5 – Fees and Compensation | *(continued)*

Private Wealth Management Services

Management fees paid to Epoch for Private Wealth Management are charged either as a percentage of assets under management, fixed fee, or an hourly fee at the rate of \$300/hour. Minimum account size varies, depending on the risk profile of the client and the underlining portfolio created and/or program selected. Account minimums for non-discretionary accounts is \$50,000; \$100,000 for discretionary accounts. Minimum annual fee is \$2,500. We may waive the minimum account size and minimum annual fee. All related accounts are aggregated in determining the annual fee paid to Epoch. Fees shall be prorated for each capital contribution and withdrawal made during the applicable calendar quarter (with the exception of de minimis contributions and withdrawals). We do not require that you provide details of all personal financial obligations, insurance policies, trusts, wills, etc. to open an account.

Fees are paid quarterly, in advance. Asset-based fees are based on the market value of the account on the last day of the previous quarter. Our contract may be terminated by us or by you upon thirty (30) days' prior written notice. If the effective date of termination of the contract occurs during the quarter in which notice of termination is given and is other than the last day of a calendar quarter for which we have received payment, you shall be entitled to receive a prorated refund of any unearned fees for the quarter. If the termination date extends beyond the last day of the quarter in which the termination notice is given and into a new calendar quarter for which we have not been previously paid, we agree to waive the 30-day notice and will not be entitled to a prorated portion of our quarterly fee for such additional period.

Our asset-based fees are:

Private Wealth Management Fee Schedule

- First \$1,000,000 1.00%
- Next \$4,000,000 0.85%
- Next \$5,000,000 0.70%
- Next \$5,000,000 0.50%
- Next \$5,000,000 0.25%
- Next \$5,000,000 0.12%
- Over \$25 million Negotiable

Certain long-standing clients may have fee schedule arrangements substantially lower than the fee arrangements prevailing for other clients. We acknowledge that lower fees for comparable services may be available from others. Fees may be deducted from the account or paid separately outside the account.

In addition to our fees, there are additional costs associated with the various investment vehicles. Investment in individual stocks, ETFs, bonds and certain no-load mutual funds may incur commissions charged by the broker-dealer/custodian. While we have a duty to obtain “best execution”, we do not guarantee the selected broker-dealer/custodian offers the lowest transaction costs. Transactions through brokers other than who you approve may result in additional commission or transaction charges. We do not guarantee that lower rates can not be found at other broker-dealers/custodians.

In recommending mutual funds to our clients, Epoch places only no-load mutual funds in your account(s), unless you authorize us to do otherwise. Additional costs in the form of investment management fees (commonly referred to as an “expense ratio”), are incurred when investing in mutual funds and ETFs. These fees typically range from 3 basis points (0.03%) to 130 basis points (1.30%). Mutual funds and ETFs report performance net of their expense ratio and trading costs.

Item 5 – Fees and Compensation | *(continued)*

Epoch may recommend and/or require that clients establish an account with Schwab Institutional, a division of Charles Schwab & Co., Inc. – a registered broker-dealer, member SIPC, to maintain custody of assets and to effect trades for your account. Epoch is not affiliated with Schwab. See (Item 12 – Brokerage Practices) for information on Epoch's relationship with recommended broker-dealers or custodians.

If we engage the services of a sub-advisor to manage your account, total aggregate annual fees typically range from 1.00% to 1.50% of account assets. A contract will indicate a specific fee based on the size of your account, type of account, and the fees charged by separate account managers – if the latter are used for your account. In breaking down the fees, Epoch's fee typically ranges from 0.25% to 0.75% of the market value of your account. Fees charged by separate account managers typically range from 0.25% to 0.75%. Fees paid to sub-advisors generally range from 0.25% to 0.35%. Brokerage and custodial fees typically range from 0.05% to 0.20%. Fees are paid quarterly, in advance, based on the value of the account on the last day of the previous quarter.

Together, we may determine that it is in your best interest to establish an account as a transaction only account and eliminate the asset-based fee charged by the broker-dealer/custodian. In evaluating a fee arrangement, we do not negotiate brokerage commissions for the execution of the transactions in your account when brokerage and custody is an asset-based fee. Depending upon the fee, the amount of transactions in your account, the value of custodial and other services provided under the program, and other factors, the total asset-based fees may, or may not, exceed the aggregate cost of such services if they were to be provided on a transactional basis.

The services provided by many of the mutual funds and the services provided by sub-advisors are under certain conditions available directly to investors from those providers. Fees charged in those circumstances may be more or less than the fees charged by Epoch. However, investors lose the value of working with Epoch in identifying risk/reward profiles, selecting appropriate investment programs, monitoring account performance, and making necessary and timely account changes.

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

Epoch does not charge any performance-based fees or fees based on a share of capital gains or capital appreciation of the assets of a client.

Item 7 – Types of Clients

Epoch manages taxable and non-taxable accounts for affluent individuals and retirement accounts for profit and non-profit institutions. We also provide pension consulting services to profit, non-profit and executive deferred compensation retirement plans.

The minimum account size for non-discretionary investment management accounts is \$50,000; \$100,000 for discretionary accounts. These minimums are subject to negotiation. There are circumstances where accounts require higher minimums, such as when sub-advisors are used for portfolios comprised of separate account managers.

Epoch has no minimum account size for pension consulting services.

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

For investment management purposes, investing in securities involves risk of loss that clients should be prepared to bear. The portfolios we build for you have not been approved or disapproved by the Securities and Exchange Commission. Any representation to the contrary is a criminal offense. Investment in securities is neither insured nor guaranteed by the Federal Deposit Insurance Corporation (FDIC) or any other government agency, unless specifically stated otherwise. Your account may lose money. Past performance is no guarantee or a reliable indicator of future results.

Epoch attempts to meet the various risk/return needs of clients by managing portfolios that range from aggressive growth to capital preservation. We employ a long-term investment philosophy and we utilize both “active” and “passive” investment strategies in your portfolio unless you request otherwise. We also utilize both “growth” and “value” investment styles in equity portfolios, while investing across the full spectrum of investment categories (e.g., domestic and foreign, large, small and medium). We also invest across the full spectrum of asset classes (e.g., stocks, bonds, alternatives, and cash equivalents). Portfolios may be rebalanced to attempt to produce a more level performance experience for investors, or we may employ a tactical allocation to take advantage of short-term market conditions. Under normal market conditions, we strive to be fully invested, and we consider the tax ramifications of short-term buying and selling. At all times, we attempt to match the investment vehicles used to fund your portfolio with that of your personal risk profile (e.g., individual equities versus equity mutual funds).

There is no assurance that your account will achieve its investment objective. Market, economic, currency and business risks affect the performance of your account. While historically stocks have been a leading choice of long-term investors, stocks carry the potential for unpredictable drops in value and periods of lackluster performance, leading to declines over short or even extended periods of time.

In selecting the individual securities for your account, we use the resources provided to us by sources such as Morningstar, Reuters/Lipper, financial journals, magazines, newsletters, sub-advisors, brokerage firm research reports, and investment management firms to name a few. We do not regularly use technical analysis though we may occasionally analyze charts in formulating investment opinion/advice. Likewise, we are not contrarian investors, but we do occasionally consider data on market and sector momentum in our decision-making processes.

In recommending investment managers for retirement plans, we recommend no-load mutual funds, ETFs and collective-investment trusts (CITs) that are appropriate for long-term investment and retirement needs. Our recommendations follow a prudent process and, additionally, those securities recommended must also meet the requirement that they be available on the platform/vendor servicing the retirement plan.

Item 9 – Disciplinary Information

Registered investment advisors are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Epoch or the integrity of Epoch's management. Epoch has no information applicable to this Item.

Item 10 – Other Financial Industry Activities and Affiliations

Epoch is not compensated by any other financial institution nor from any other source other than from our clients. Epoch's only business is providing investment management and pension consulting services.

We may have contractual relationships with independent money managers who manage assets in our private wealth management program. And we may have contractual relationships with other investment advisory firms in providing pension consulting services. While these organizations may benefit us in providing additional expertise, products and services, none of them are material to our advisory business and we do not receive compensation (e.g., referral fees) from these relationships.

While we endeavor to act in our clients' best interests, we may recommend that clients maintain their accounts at Charles Schwab & Co. which is based in part on the benefit to us of gaining access to important products and services and not solely on the nature, cost or quality of custody and brokerage services provided. As a result, this action may create a potential conflict of interest. See (Item – 12 Brokerage Practices) for information on our relationship with recommended broker-dealers or custodians.

Item 11 – Code of Ethics

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

We anticipate that, in appropriate circumstances, consistent with clients' investment objectives, it will cause accounts over which we have management authority to effect, and will recommend to our clients or prospective clients, the purchase or sale of securities in which Epoch and its clients, directly or indirectly, have a position of interest. Epoch's employees and persons associated with the firm are required to follow Epoch's Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors and employees of Epoch may trade for their own accounts in securities which are recommended to and/or purchased for our clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of Epoch will not interfere with (i) making decisions in the best interest of our clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Ethics Code, certain classes of securities have been designated as exempt transactions based upon a determination that these would materially not interfere with the best interest of our clients (e.g., mutual funds). In addition, the Ethics Code requires pre-clearance of many transactions, and restricts trading in close proximity to client trading activity. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as our clients, there is a possibility that employees might benefit from market activity by a client in a security held

Item 11 – Code of Ethics | *(continued)*

by an employee. Employee trading is continually monitored under the Code of Ethics and to reasonably prevent conflicts-of-interest between Epoch and its clients.

A Chief Compliance Officer has been appointed by Epoch to monitor compliance and to recommend revisions to the Ethics Code where revisions are viewed as strengthening Epoch's fiduciary responsibilities to its clients. Clients or prospective clients may request a copy of the firm's Code of Ethics by contacting Yvette Clark at (800) 882-7537 or yclark@epochcg.com.

Item 12 – Brokerage Practices

For our private wealth management clients, Epoch does not maintain custody of your assets on which we advise, although we may be deemed to have custody of your assets if you give us authority to withdraw assets from your account (see Item – 15 Custody). Your assets must be maintained in an account at a "qualified custodian", generally a broker-dealer or bank. We request that our clients use Charles Schwab & Co., Inc. (Schwab), a registered broker-dealer, member SIPC, as the qualified custodian. Epoch is independently owned and operated and not affiliated with Schwab, nor do they refer clients to us. Schwab will hold your assets in a brokerage account and buy and sell securities when we/you instruct them to do so. While we recommend that you use Schwab as custodian/broker, you will decide whether to do so and will open your account with Schwab by entering into an account agreement directly with them. We do not open the account for you, although we may assist you in doing so. Not all advisors require their clients use a particular broker-dealer or other custodian selected by the advisor. Even though your account is maintained at Schwab, we can still use other brokers to execute trades for your account as described below (see "*Your Brokerage and Custody Costs*").

How We Select Broker-Dealers/Custodians

We seek to recommend a broker-dealer/custodian that will hold your assets and execute transactions on terms that are, overall, most advantageous when compared to other available providers and their services. We consider a wide range of factors, including:

- Combination of transaction execution services and asset custody services (generally without a separate fee for custody)
- Capability to execute, clear, and settle trades (buy and sell securities for your account)
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
- Breadth of available investment products (stocks, bonds, mutual funds, ETFs, etc.)
- Availability of investment research and tools that assist us in making investment decisions
- Quality and timeliness of services
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices
- Reputation, financial strength, and stability
- Prior service to us and our other clients
- Availability of other products and services that benefit us, as discussed below (see "*Products and Services Available to Us from Schwab*")

Item 12 – Brokerage Practices | (continued)

Your Brokerage and Custody Costs

For our clients' accounts that Schwab maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. Certain trades (for example, many mutual funds and ETFs) may not incur Schwab commissions or transaction fees. Schwab is also compensated by earning interest on the uninvested cash in your account in Schwab's Cash Features Program. Schwab's commission rates applicable to our client accounts were negotiated based on the condition that our clients collectively maintain a total of at least \$10 million of their assets in accounts at Schwab. This commitment benefits you because the overall commission rates you pay are lower than they would be otherwise. In addition to commissions, Schwab charges you a flat dollar amount as a "prime broker" or "trade away" fee for each trade that we have executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into your Schwab account. These fees are in addition to the commissions or other compensation you pay the executing broker-dealer. Because of this, in order to minimize your trading costs, we have Schwab execute most trades for your account. We have determined that having Schwab execute most trades is consistent with our duty to seek "best execution" of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed on the previous page (see "*How We Select Broker-Dealers/Custodians*").

Products and Services Available to Us from Schwab

Schwab Advisor Services™ is Schwab's business serving independent investment advisory firms like us. They provide us and our clients with access to their institutional brokerage services (trading, custody, reporting, and related services), many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer our clients' accounts, while others help us manage and grow our business. Schwab's support services are generally available on an unsolicited basis (we don't have to request them) and at no charge to us. Following is a more detailed description of Schwab's support services:

Services that benefit you include Schwab's institutional brokerage services that gives us access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients.

Services that may not directly benefit you are those products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts. They include investment research, both Schwab's own and that of third-parties. We may use this research to service all or a substantial number of our clients' accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:

- Provide access to client account data (such as duplicate trade confirmations and account statements)
- Facilitate trade execution and allocate aggregated trade orders for multiple client accounts
- Provide pricing and other market data
- Facilitate payment of our fees from our clients' accounts
- Assist with back-office functions, recordkeeping, and client reporting

Item 12 – Brokerage Practices | (continued)

Services that generally benefit only us are services that are intended to help us manage and further develop our business enterprise. These services include:

- Educational conferences and events
- Consulting on technology, compliance, legal, and business needs
- Publication and conferences on practice management and business succession
- Access to employee benefits providers, human capital consultants, and insurance providers
- Marketing consulting and support

Schwab may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab may also discount or waive its fees for some of these services or pay all or a part of a third party's fees. Schwab may also provide us with other benefits, such as occasional business entertainment of our personnel.

Our Interest in Schwab's Services

The availability of these services from Schwab benefits us because we do not have to produce or purchase them as long as we collectively keep \$10 million in client assets at Schwab. Beyond that, these services are not contingent upon us committing any specific amount of business to Schwab in trading commission or assets in custody. The \$10 million minimum may give us an incentive to request that you maintain your account with Schwab, based on our interest in receiving Schwab's services that benefit our business rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a potential conflict-of-interest. We believe, however, that our selection of Schwab as custodian and broker is in the best interests of our clients. Our selection is primarily supported on the scope, quality, and price of Schwab's services and not Schwab's services that benefit only us.

For our retirement plan clients, we are totally agnostic toward the platform selected by the employer. When we are hired to recommend service platforms, we follow a prudent process of identifying service providers and their platforms who meet only the objectives and criteria established by the employer/plan sponsor.

Item 13 – Review of Accounts

We review all accounts in our private wealth management program at least quarterly and meet in person or by telephone to discuss performance and changes to your financial objectives or risk/return profile. More frequent reviews may be triggered by: (i) important issues affecting the financial markets; (ii) change in client's financial circumstances; or (iii) change in Epoch's opinion relative to a company, mutual fund, industry or sector, or sub-advisor relationship. Clients receive quarterly performance reports from Epoch showing investment holdings and performance for the period, year-to-date, and since account origination. Separately, clients receive monthly statements directly from the broker-dealer/custodian showing investment holdings and all transactions for that period. Special reports for clients may be prepared based on the needs of a client and provided more frequently than on a quarterly basis. A "realized gains & loss" report is provided annually for taxable accounts. All client reviews are conducted by Rick Tasker, the firm's president and founder. Clients may call Epoch any time during normal business hours to discuss their account.

For pension consulting clients, we provide quarterly investment monitoring reports and attend quarterly meetings for certain pension clients—every 6-months, or annually for others.

Item 14 – Client Referrals and Other Compensation

Epoch does not have agreements with any person or institution where compensation is paid for the referral of clients. Epoch does have an agreement with Transparent 401k, an independent registered investment advisory firm that is not affiliated or under any common ownership with Epoch, for bilingual communication and education services provided to certain clients. When engaging Transparent 401k, we notify client of the services being provided and the fees paid to Transparent 401k. We acknowledge to such client that while Epoch does not increase its annual advisory fee to cover the fees paid to Transparent 401k, it may be less willing to negotiate fees when we pay for services provided by Transparent 401k.

All fees, or fee sharing arrangements, are fully described in a “Customer Acknowledgement Agreement” document that is provided clients. Epoch may establish agreements with others.

Item 15 – Custody

Under government regulations, we are deemed to have custody of your assets if, for example, you authorize us to instruct Schwab to deduct our advisory fees directly from your account (or if you grant us authority to move your money to another person’s account).

Schwab maintains actual custody of your assets. You will receive account statements directly from Schwab at least quarterly. They will be sent to the email or postal mailing address you provided to Schwab. You should carefully review those statements promptly when you receive them. We also urge you to compare Schwab’s account statements with the periodic account statements / portfolio reports you receive from us.

Item 16 – Investment Discretion

We usually do not retain discretionary authority on accounts in which we manage. For those clients where we employ the services of sub-advisors, the sub-advisors will have discretionary authority on your account. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives and risk profile for the particular client account. From the outset of our advisory relationship, you will determine whether you would like us to employ a sub-advisor. And while our services are customized for each client, you may impose restrictions on the types of securities, industries, countries, etc., we place in your account—when Epoch is the manager and when we use sub-advisors.

Investment guidelines and restrictions must be provided to us in writing.

Item 17 – Voting Client Securities

As a matter of firm policy and practice, we do not have any authority to (and do not) vote proxies on behalf of our clients. You retain the responsibility for receiving and voting proxies for any and all securities maintained in your account. We may provide advice to you regarding voting of the proxies. In the event that Epoch identifies a potential conflict between its interests and those of its client with respect to the voting of a proxy, Epoch will notify and seek guidance from the client. In the event Epoch does not receive timely direction or guidance regarding the voting of the proxy, Epoch will abstain from voting the proxy.

When sub-advisors are employed, the sub-advisors generally retain the right to vote proxies.

Item 18 – Financial Information

We are required to provide you with certain financial information or disclosures about Epoch's financial condition. Epoch has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to its clients and has not been the subject of a bankruptcy proceeding.

Brochure Supplement

Item 1 – Name of Advisory Representative

Rick L. Tasker, GFS[®], AIF[®]

Epoch Consulting Group

2455 Bennett Valley Road, Suite B115

Santa Rosa, CA 95404

Telephone: (707) 524-5800 | Fax: (707) 524-4621 | Email: rtasker@epochcg.com

Dated: March 1, 2019

This Brochure Supplement provides information about Rick L. Tasker that supplements the Epoch Consulting Group Brochure. You should have received a copy of that Brochure when you became a client. Please contact Yvette Clark at (707) 524-5800 or yclark@epochcg.com if you did not receive Epoch's Brochure, would like the most recent amended Brochure, or if you have any questions about the contents of this supplement.

Item 2 – Educational Background, Designations and Business Experience

Rick L. Tasker, GFS[®], AIF[®]

Year of Birth: 1954

Southeastern University, Washington, D.C. | Graduated 1976 | BS in Accounting

Investment Advisor, President & Founder of Epoch Consulting Group

Rick Tasker is the founder and President of Epoch Consulting Group—a fee-only registered investment advisory firm specializing in ERISA and executive compensation matters, which he founded in 2004.

Rick has over 25 years of experience in retirement plans and has provided consulting and fiduciary advisory services to corporations and non-profit institutions throughout the country in the area of plan design, investment consulting, compliance, employee education, and vendor selection. He has extensive experience in the oversight and operations of retirement plans and assisting plan fiduciaries in meeting their fiduciary responsibilities.

Rick earned a Bachelor's Degree in Business Administration from Southeastern University in Washington, D.C. He is a non-practicing Certified Public Accountant, and has earned the Global Fiduciary Strategist designation from the Leadership Center for Investment Stewards, and the Accredited Investment Fiduciary designation from the Center for Due Diligence.

Certified Public Accountant – (currently in non-practicing status)

Global Fiduciary Strategist (GFS[®]) – The GFS Designation certifies that the recipient has been trained on a body of specialized knowledge designed to teach attendees how to serve more effectively as leaders and stewards in critical decision-making roles. The training and designation is used to substantiate multiple standards of care, including a fiduciary, governance, project management, global wealth management, and life insurance best practices standard. To receive the designation, the advisor must complete a training program and successfully pass a comprehensive, closed-book final examination issued by 3ethos—a Leadership Center founded by Don Trone. Minimum annual requirements exist in order to maintain the designation.

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Brochure Supplement

Item 1 – Name of Advisory Representative

Rick L. Tasker, GFS[®], AIF[®]

Epoch Consulting Group

2455 Bennett Valley Road, Suite B115

Santa Rosa, CA 95404

Telephone: (707) 524-5800 | Fax: (707) 524-4621 | Email: rtasker@epochcg.com

Dated: March 1, 2019

Item 2 – Educational Background, Designations and Business Experience

(continued from previous page)

Rick L. Tasker, GFS[®], AIF[®]

President & Founder of Epoch Consulting Group

Accredited Investment Fiduciary (AIF[®]) – The AIF Designation certifies that the recipient has specialized knowledge of fiduciary standards of care and their application to the investment management process. To receive the designation, the advisor must meet prerequisite criteria based on a combination of education, relevant industry experience, and/or ongoing professional development, complete a training program, successfully pass a comprehensive, closed-book final examination under the supervision of a proctor and agree to abide by a Code of Ethics and Conduct Standards. Minimum annual requirements exist in order to maintain the designation.

Brochure Supplement

Rick L. Tasker, GFS[®], AIF[®]

Epoch Consulting Group

2455 Bennett Valley Road, Suite B115

Santa Rosa, CA 95404

Telephone: (707) 524-5800 | Fax: (707) 524-4621 | Email: rtasker@epochcg.com

Dated: March 1, 2019

This Brochure Supplement provides information about Rick L. Tasker that supplements the Epoch Consulting Group Brochure. You should have received a copy of that Brochure when you became a client. Please contact Yvette Clark at (707) 524-5800 or yclark@epochcg.com if you did not receive Epoch's Brochure, would like the most recent amended Brochure, or if you have any questions about the contents of this supplement.

Item 3 – Disciplinary Information

Registered investment Advisors are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each person providing investment advice. The advisor, while not admitting nor denying the allegations, settled with the Department of Labor over allegations that fiduciary obligations were breached on certain ERISA client assets that were invested in a failed hedge fund operated and managed by a separate investment management firm. The advisor agreed to monetary relief (subject to specific conditions), and an agreement not to provide discretionary 3(38) investment management services to ERISA clients.

Item 4 – Other Business Activities

The advisor is not engaged in any other business activities nor does the advisor receive any other compensation other than from Epoch Consulting Group.

Item 5 – Additional Compensation

The advisor receives no other compensation (sales awards, prizes, etc.) from sources outside of Epoch Consulting Group. The advisor does receive small cash or gifts (typically less than \$50) for participation in surveys, which are often gifted to charity. The advisor may also attend seminars and industry-related conventions where lunch and/or dinner may be provided.

Item 6 – Supervision

The advisor is the President and Chief Compliance Officer at Epoch Consulting Group.

Brochure Supplement

Item 1 – Name of Advisory Representative

Elizabeth N. Barrett, AIF®

Epoch Consulting Group

2455 Bennett Valley Road, Suite B115

Santa Rosa, CA 95404

Telephone: (415) 385-0635 | Fax: (707) 524-4621 | Email: ebarrett@epochcg.com

Dated: March 1, 2019

This Brochure Supplement provides information about Elizabeth N. Barrett that supplements the Epoch Consulting Group Brochure. You should have received a copy of that Brochure when you became a client. Please contact Yvette Clark at (707) 524-5800 or yvclark@epochcg.com if you did not receive Epoch's Brochure, would like the most recent amended Brochure, or if you have any questions about the contents of this supplement.

Item 2 – Educational Background, Designations and Business Experience

Elizabeth N. Barrett, AIF®

Year of Birth: 1957

University of New Hampshire | Graduated 1980 | BS in Speech/Language Pathology

University of New Hampshire | Graduated 1994 | MS in Speech/Language Pathology

Investment Advisor, Epoch Consulting Group

Ms. Barrett is an Investment Advisor representative for Epoch Consulting Group—a fee-only registered investment advisory firm specializing in ERISA and executive compensation matters. In that role, she is responsible for providing consulting and fiduciary advisory services to a select number of corporate retirement plans in the area of plan design, investment consulting, compliance, and employee education.

Prior to joining Epoch, Ms. Barrett was Director of Retirement Plan Group for California Investment Trust from 2000 to 2014, supporting that firm in all aspects of retirement plan consulting.

Ms. Barrett holds the ASHA Certificate of Clinical Competence, a nationally recognized professional credential that represents a level of excellence in the field of Audiology or Speech-Language Pathology.

Accredited Investment Fiduciary (AIF®) – The AIF Designation certifies that the recipient has specialized knowledge of fiduciary standards of care and their application to the investment management process. To receive the designation, the advisor must meet prerequisite criteria based on a combination of education, relevant industry experience, and/or ongoing professional development, complete a training program, successfully pass a comprehensive, closed-book final examination under the supervision of a proctor and agree to abide by a Code of Ethics and Conduct Standards. Minimum annual requirements exist in order to maintain the designation.