

# **East End Financial Group, Inc.**

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

**Effective: September 29, 2017**

This Form ADV Part 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of the East End Financial Group, Inc. (“EEFG” or the “Advisor”). If you have any questions about the contents of this Disclosure Brochure, please contact us at 631-727-8111.

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

Additional information about EEFG and its advisory persons are available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching for our firm name or by our CRD# 110584.

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## Item 2 – Material Changes

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

EEFG believes that communication and transparency are the foundation of its relationship with Clients and will continually strive to provide its Clients with complete and accurate information at all times. EEFG encourages all current and prospective Clients to read this Disclosure Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback.

### Material Changes

There have been no material changes made to this Disclosure Brochure since the last filing and distribution to Clients. However, the Disclosure Brochure has been redrafted to streamline its format and disclosures.

### Future Changes

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

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching for our firm name or by our CRD# 110584. You may also request a copy of this Disclosure Brochure at any time, by contacting us at 631-727-8111.

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## Item 4 – Advisory Services

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### A. Firm Information

East End Financial Group, Inc. (“EEFG” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”), which was organized as a Corporation under the laws of the State of New York in March 1992. EEFG’s primary owners are John J. Kosinski (Founder), The Kosinski Trust #1 and The Kosinski Trust #2, Joseph J. Kosinski (Partner) and Annmarie Zilnicki (President).

This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by EEFG. For questions related to this Disclosure Brochure, please contact Annmarie Zilnicki at 631-727-8111 or by email at [azilnicki@eefgcorp.com](mailto:azilnicki@eefgcorp.com).

### B. Advisory Services Offered

EEFG offers investment advisory and related services to individuals, high net worth individuals, trusts, estates, charitable organizations, municipalities, businesses and retirement plans (each referred to as a “Client”).

#### Investment Management Services

EEFG provides customized investment advisory solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary or non-discretionary investment management and related advisory services. EEFG works closely with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create an appropriate portfolio strategy. EEFG will then construct a portfolio for the Client that may include the use of our internal investment management, implementation through independent managers/platforms, and/or implementation through American Portfolios.

*Internal Investment Management* - EEFG constructs portfolios utilizing low-cost, diversified mutual funds and/or exchange-traded funds (“ETFs”) to achieve the Client’s investment goals. The Advisor may also utilize individual stocks, individual fixed income securities, certificates of deposit (“CDs”), variable annuities and/or limited partnerships, as appropriate for each Client. The Advisor may also advise upon other types of investments and may retain certain legacy investments held by the Client.

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

EEFG evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. EEFG may recommend, on occasion, redistributing investment allocations to diversify the portfolio. EEFG may recommend specific positions to increase sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement. EEFG may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client’s risk tolerance.

At no time will EEFG accept or maintain custody of a Client’s funds or securities, except for authorized deduction of the Advisor’s fees. All Client assets will be managed within their designated account[s] at the Custodian, pursuant to the Client investment advisory agreement. Please see Item 12.

*Use of Independent Managers* - EEFG may recommend that a Client utilize one or more unaffiliated investment managers or investment platforms (collectively “Independent Managers”) for all or a portion of a Client’s investment portfolio. In such instances, the Client may be required to authorize and enter into an advisory agreement with the Independent Manager[s] that defines the terms in which the Independent Manager[s] will provide investment management and related services. The Advisor may also assist in the development of the

initial policy recommendations and managing the ongoing Client relationship. The Advisor will perform initial and ongoing oversight and due diligence over the selected Independent Manager[s] to ensure the Independent Managers' strategies and target allocations remain aligned with its clients' investment objectives and overall best interests. The Client, prior to entering into an agreement with unaffiliated investment manager[s] or investment platform[s], will be provided with the Independent Manager's Form ADV 2A (or a brochure that makes the appropriate disclosures).

*Use of Independent Managers* – For certain Clients, EEFG may recommend that the Client establish accounts with American Portfolio Advisors, Inc. (CRD# 125112), an unaffiliated registered investment advisor ("APA"). Certain of its Advisory Persons are also Investment Advisor Representatives of APA. If a Client implements investments under APA, the Advisor will not charge an additional investment advisory fee. Please see Item 5.E.

#### Retirement Plan Advisory Services

Plan Sponsors may engage EEFG to serve as a 3(38) Fiduciary to their plan and assume investment discretion over the Plan. In such instances, the Plan Sponsor shall authorize this discretion to select and implement the Plan investment options. Services generally include:

- Vendor Analysis
- Employee Enrollment and Education Tracking
- Investment Policy Statement ("IPS") Support
- Investment Management
- Performance Reports
- Ongoing Investment Recommendation and Assistance
- ERISA 404(c) Assistance
- Benchmarking Services

#### Financial Planning Services

EEFG will typically provide a variety of financial planning and consulting services to Clients, pursuant to a written financial planning agreement. Services are offered in several areas of a Client's financial situation, depending on their goals, objectives and financial situation. Planning engagements may be provided as a separate service offering or part of the Advisor's comprehensive wealth management services, pursuant to the terms of the Agreement[s] with the Advisor.

Generally, such financial planning services involve preparing a formal financial plan or rendering a specific financial consultation based on the Client's financial goals and objectives. This planning or consulting may encompass one or more areas of need, including but not limited to, investment planning, retirement planning, personal savings, education savings and other areas of a Client's financial situation.

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

EEFG may also refer Clients to an accountant, attorney or other specialists, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of the Client's financial situation, observations, and recommendations. For consulting or ad-hoc engagements, the Advisor may not provide a written summary. Plans or consultations are typically completed within six months of contract date, assuming all information and documents requested are provided promptly.

Financial planning and consulting recommendations may pose a conflict between the interests of the Advisor and the interests of the Client.

### C. Client Account Management

Prior to engaging EEFG to provide investment advisory services, each Client is required to enter into one or more agreements with the Advisor that define the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

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

### D. Wrap Fee Programs

EEFG does not manage or place Client assets into a wrap fee program. Investment management services are provided directly by EEFG.

### E. Assets Under Management

As of December 31, 2016, EEFG manages \$334,000,000 in discretionary assets and \$5,000,000 in non-discretionary assets for total assets under management of \$339,000,000. Clients may request more current information at any time by contacting the Advisor.

## Item 5 – Fees and Compensation

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

### A. Fees for Advisory Services

#### Investment Management Services

Investment advisory fees are paid quarterly, in advance of each calendar quarter, pursuant to the terms of the investment management agreement. Investment management fees are based on the market value of assets under management at the end of the prior calendar quarter. Investment management fees are typically based on the following schedule:

Assets Under Management (\$)	Annual Rate (%)
Up to \$1,000,000	1.00%
\$1,000,001 to \$1,500,000	0.75%
\$1,500,001 to \$2,000,000	0.50%
Over \$2,000,000	0.25%

\* Clients are subject to a minimum annual fee of \$5,000

Investment management fees for Charitable organizations and Municipalities are based on the following schedule:

Assets Under Management (\$)	Annual Rate (%)
Up to \$500,000	1.00%
\$500,001 to \$1,000,000	0.75%
\$1,000,001 to \$2,000,000	0.50%
\$2,000,001 and Over	0.25%

\* Clients are subject to a minimum annual fee of \$5,000

The investment management fee in the first quarter of service is prorated from the inception date of the account[s] to the end of the first quarter. Fees may be negotiable at the sole discretion of the Advisor. Certain Clients may also have limited scope services offered at a fee schedule that is lower than listed above. Certain Clients may be offered a fee schedule that differs from above including a fixed annual fee engagement or other fee methodologies. The Client's fees will take into consideration the aggregate assets under management with Advisor. All securities held in accounts managed by EEFG will be independently valued by the designated Custodian. EEFG will not have the authority or responsibility to value portfolio securities.

The Advisor's fee is exclusive of, and in addition to, brokerage fees, transaction fees, and other related costs and expenses, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs.

#### Financial Planning Services

EEFG offers financial planning services either on an hourly basis or a fixed engagement fee. Hourly engagements are at a rate of up to \$300 per hour. Fixed fees are agreed upon prior to execution of a financial planning agreement and are based on the expected time, effort, and complexity of the engagement. An estimate for total hours and/or total costs will be provided to the Client prior to engaging for these services.

### **B. Fee Billing**

#### Investment Management Services

Investment management fees are calculated by the Advisor or its delegate and deducted from the Client's account[s] at the Custodian. The Advisor shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client's account[s] at the beginning of the respective quarter. The amount due is calculated by applying the annual rate (annual rate divided by 4) to the total assets under management with EEFG at the end of the prior quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the investment advisory fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the Custodian's brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting EEFG to be paid directly from their account[s] held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian. Clients may also choose to have their fees invoiced directly.

#### Use of Independent Managers

For Clients referred by the Advisor to an Independent Manager, the Client's fee may be separately billed or deducted from the Client's account[s] by the Independent Manager.

#### Retirement Plan Advisory Services Fees

Fees for retirement plan advisory services are charged an annual asset-based fee based on the following schedule:

Assets Under Management (\$)	Annual Rate (%)
Up to \$1,000,000	1.00%
\$1,000,001 to \$1,500,000	0.75%
\$1,500,001 to \$2,000,000	0.50%
Over \$2,000,000	0.25%

\* Clients are subject to a minimum annual fee of \$5,000

Fees may be negotiable depending on the size and complexity of the Plan and the services to be offered.

#### Financial Planning Services

Financial planning fees are invoiced by the Advisor and are due upon completion of the agreed upon deliverable[s].

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

Clients may incur certain fees or charges imposed by third parties, other than EEFG, in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all custody and securities execution fees charged by the Custodian and executing broker-dealer. The fees charged by EEFG are separate and distinct from these custody and execution fees.



In addition, all fees paid to EEFG for investment advisory services are separate and distinct from the expenses charged by mutual funds and ETFs to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client could invest in these products directly, without the services of EEFG, but would not receive the services provided by EEFG which are designed, among other things, to assist the Client in determining which products or services are most appropriate for each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by EEFG to fully understand the total fees to be paid. Certain legacy Clients may be invested in mutual funds where Advisory Persons of the Advisor, in one's separate capacity, may also receive trail commissions (12b-1 fees). Please see Item 5.E. below and Item 12 – Brokerage Practices for additional information.

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

##### Investment Management Services

EEFG is compensated for its investment management services in advance of the quarter in which services are rendered. Either party may terminate the investment advisory agreement, at any time, by providing 30-days advance written notice to the other party. The Client may terminate the investment advisory agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. The Advisor will refund any unearned, prepaid investment advisory fees from the effective date of termination to the end of the quarter. The Client's investment advisory agreement with the Advisor is non-transferable without the Client's prior consent.

##### Use of Independent Managers

In the event that a Client should wish to terminate their relationship with the Independent Manager, the terms for termination will be set forth in the respective agreements between the Client and that Independent Manager. EEFG will assist the Client with the termination and transition as appropriate.

##### Retirement Plan Advisory Services Fees

EEFG is compensated for its retirement plan advisory services in advance of the quarter in which services are rendered. Either party may request to terminate their services with EEFG, at any time, by providing 30-days advance written notice to the other party. The Advisor will refund any unearned, prepaid investment advisory fees from the effective date of termination to the end of the quarter. The Client's retirement plan services agreement with the Advisor is non-transferable without the Client's prior consent.

##### Financial Planning Services

EEFG is compensated for its services upon completion of the engagement deliverable[s]. Either party may terminate the financial planning agreement by providing 30-days advance written notice to the other party. The Client may terminate the financial planning agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Upon termination, the Client shall be billed for actual hours logged on the planning project times the contractual hourly rate. The Client's financial planning agreement with the Advisor is non-transferable without the Client's prior approval.

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

EEFG does not buy or sell securities and does not receive any compensation for securities transactions in any Client account, other than the investment advisory fees noted above. However, certain advisory persons may earn additional compensations as described below.

##### Broker-Dealer Affiliation

Advisory Persons are also Registered Representatives of American Portfolios Financial Services, Inc. ("APFS"). APFS is a registered broker-dealer (CRD No. 18487), member FINRA, SIPC. In one's separate capacity as a Registered Representative of APFS, an Advisory Person may implement securities transactions under APFS and not through EEFG. In such instances, an Advisory Person will receive commission-based compensation in



connection with the purchase and sale of securities, including 12b-1 fees for the sale of investment company products. Compensation earned by an Advisory Person in one's capacity as a Registered Representative is separate and in addition to the Advisor's fees. This practice presents a conflict of interest because the Advisory Person who is a Registered Representative has an incentive to effect securities transactions for the purpose of generating commissions rather than solely based on the Client. Clients are not obligated to implement any recommendation provided by the Advisor nor Advisory Persons. Please see "Item 10 – Other Financial Industry Activities and Affiliations".

#### Investment Adviser Affiliation

Certain Advisory Persons are also Investment Advisor Representatives of APA. In certain instances, an Advisory Person may recommend implementation of investment management services under APA and not EEFG. Please see Item 10 below.

#### Insurance Agency Affiliation

Advisory Persons are also licensed as insurance professionals Kosinski Associates, Inc. As an independent insurance professional, an Advisory Person may earn commission-based compensation for selling insurance products, including insurance products they sell to you. Insurance commissions earned by these persons are separate and in addition to our advisory fees. This practice presents a conflict of interest because the person providing investment advice on behalf of the Advisor who is also an insurance agent has an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely based on your needs. However, you are under no obligation, contractually or otherwise, to purchase insurance products through any Advisory Person affiliated with the Advisor.

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

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

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

### **Item 7 – Types of Clients**

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EEFG offers investment advisory and related services to individuals, high net worth individuals, trusts, estates, charitable organizations, municipalities, businesses and retirement plans. The percentage of each type of Client is available on EEFG's Form ADV Part 1A. These percentages may change over time and are updated at least annually by the Advisor. EEFG generally requires a minimum account size for establishing a relationship of \$500,000 to effectively implement its investment process.

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

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

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

Fundamental analysis utilizes economic and business indicators as investment selection criteria. These criteria are generally ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The

Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in "Item 13 – Review of Accounts".

Technical analysis involves the analysis of past market data rather than specific company data in determining the recommendations made to clients. Technical analysis may involve the use of charts to identify market patterns and trends, which may be based on investor sentiment rather than the fundamentals of the company. The primary risk in using technical analysis is that spotting historical trends may not help to predict such trends in the future. Even if the trend will eventually reoccur, there is no guarantee that EEFG will be able to accurately predict such a reoccurrence.

Cyclical analysis is similar to technical analysis in that it involves the analysis of market conditions at a macro (entire market/economy) or micro (company specific) level, rather than the overall fundamental analysis of the health of the particular company that EEFG is recommending. The risks with cyclical analysis are similar to those of technical analysis.

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

## **B. Risk of Loss**

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

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

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

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. **Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.**

## **Item 9 – Disciplinary Information**

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**There are no legal, regulatory or disciplinary events involving EEFG or any of its management persons.** EEFG values the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider with whom you partner. Our backgrounds are on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching by our firm name or our CRD# 110584.

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

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### Broker-Dealer Affiliation

As noted in Item 5.E., Advisory Persons are also Registered Representatives of AFPS. In one's separate capacity as a Registered Representative, an Advisory Person will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by an Advisory Person. For certain legacy Clients that have assets invested in commissionable share classes through EEFG, the Registered Representative may also receive a trail commission (12b-1 fee) on those investments. The Advisor does not offer such a structure to new Clients.

### Investment Adviser Affiliation

As noted in Item 5.E., certain Advisory Persons are also Investment Advisor Representatives of APA and may recommend implementation of investment management services under APA and not EEFG. In such instances, the Advisory Person will deliver the ADV 2A – Disclosure Brochure and ADV 2B – Brochure Supplement[s] for APA. The Client will enter into a separate agreement with APA. Clients are not obligated to obtain advisory services through APA and the Advisor will not earn ongoing investment advisory fees in connection with any services implemented in an Advisory Person's separate capacity with APA.

### Insurance Agency Affiliations

As noted in Item 5, Advisory Persons are also licensed as insurance professionals under Kosinski Associates, Inc. Implementations of insurance recommendations are separate and apart from one's role with EEFG. As an insurance professional, an Advisory Person may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Advisory Persons are not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Advisory Persons or the Advisor.

### Use of Independent Managers

As noted in Item 4, the Advisor may select Independent Managers to assist with the implementation of a Client's investment strategy. In such arrangements, the Advisor will receive a portion of the investment advisory fees collected by the Independent Manager from the Client. The Advisor will not charge its own investment advisory fee for assets referred to an Independent Manager.

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

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

EEFG has implemented a Code of Ethics (the "Code") that defines our fiduciary commitment to each Client. This Code applies to all persons associated with EEFG (our "Supervised Persons"). The Code was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. EEFG and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of EEFG's Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code covers a range of topics that address employee ethics and conflicts of interest. To request a copy of our Code, please contact us at 631-727-8111.

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

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

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

EEFG allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities that we recommend (purchase or sell) to you

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

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

While EEFG allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterwards.

**At no time will EEFG, or any Supervised Person of EEFG, transact in any security to the detriment of any Client.**

### **Item 12 – Brokerage Practices**

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

EEFG does not maintain custody of Client assets and does not have discretionary authority to select the broker-dealer/ custodian (herein the "Custodian") for custody and execution services. The Client will engage the Custodian and authorize EEFG to trade within its account[s] at the Custodian, unless otherwise directed by the Client. EEFG will recommend the Custodian and assist with the paperwork for establishing account[s]. Through the investment advisory agreement and Custodian agreements, the Client shall authorize EEFG to access the Client's account[s] and effect securities trades.

As its Advisory Persons are also Registered Representatives of APFS, EEFG and its Advisory Persons are limited in the custodian[s] in which they can recommend to Clients. Typically, EEFG will recommend that Clients establish accounts at Pershing LLC, member FINRA, NYSE, SIPC, which is a wholly-owned subsidiary of The Bank of New York Mellon Corporation (herein "Pershing"). For certain Clients, the Advisor may recommend that advisory accounts be implemented in an Advisory Person's separate capacity as an investment advisor representative of APA.

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

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

**2. Brokerage Referrals** - EEFG does not receive any compensation from any third party in connection with the recommendation for establishing an account. However, as noted in Item 10, certain legacy Clients may have mutual fund investments which pay a trail commission (12b-1 fee) that is paid to the Advisory Person in one's separate capacity as a Registered Representative with APFS.

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

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

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

## **Item 13 – Review of Accounts**

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

Securities in Client accounts are monitored on a regular and continuous basis by Advisory Persons of EEFG and periodically by its CCO. Formal reviews are generally conducted at least annually or more or less frequently depending on the needs of the Client. Financial planning requires a timely and regular review of a Client's financial situation. Although the Client may engage EEFG to review the Client's financial plan at any time, the Advisor encourages the Client to engage and participate in an annual review at a minimum.

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

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more or less frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account. The Client is encouraged to notify EEFG if changes occur in the Client's personal financial situation that might adversely affect the Client's investment plan. Additional reviews may be triggered by material market, economic or political events.

### **C. Review Reports**

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

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

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### **A. Compensation Received by EEFG**

#### Participation in Institutional Advisor Platform

EEFG may refer Clients to various unaffiliated, non-advisory professionals (e.g. attorneys, accountants, estate planners) to provide certain financial services necessary to meet the goals of its Clients. Likewise, EEFG may receive non-compensated referrals of new Clients from various third-parties. EEFG is not compensated for such referrals.

#### Participation in Institutional Advisor Platform

EEFG has established an institutional relationship with Pershing to assist the Advisor in managing Client account[s]. Access to the Pershing Institutional platform is provided at no charge to the Advisor. The Advisor receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at Pershing. The software and related systems support may benefit the Advisor, but not its Clients directly. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a Custodian creates a potential conflict of interest since these benefits may influence the Advisor's recommendation of this Custodian over one that does not furnish similar software, systems support, or services.

Additionally, the Advisor may receive the following benefits from Pershing: receipt of duplicate Client confirmations and bundled duplicate statements; access to a trading desk that exclusively services its institutional participants; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to Client accounts; and access to an electronic communication network for Client order entry and account information.

#### Investment Advisor Representative, Registered Representative and Insurance Recommendations

As noted in item 10, certain Advisory Persons may also be Investment Advisor Representatives with APA, Registered Representatives with APFS or licensed as insurance professionals through Kosinski Associates, Inc. In such separate capacities, the Advisory Person may receive additional compensation as detailed in Item 10.

#### Use of Independent Managers

The Advisor may be indirectly compensated by an Independent Manager as described in Item 5 above and does not receive any other forms of compensation with such arrangements.

### **B. Client Referrals from Solicitors**

EEFG does not engage paid solicitors for Client referrals.

## **Item 15 – Custody**

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EEFG does not accept or maintain custody of any Client accounts, except for the authorized deduction of the Advisor's fees. All Clients must place their assets with a qualified Custodian. Clients are required to engage the Custodian to retain their funds and securities and direct EEFG to utilize that Custodian for the Client's security transactions. Clients are urged to review statements provided by the Custodian and compare to any reports provided by EEFG to ensure accuracy, as the Custodian does not perform this review. For more information about custodians and brokerage practices, see "Item 12 - Brokerage Practices".

## **Item 16 – Investment Discretion**

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

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

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

## **Item 18 – Financial Information**

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



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

**for**

**John J. Kosinski, ChFC<sup>®</sup>, CLU<sup>®</sup>, MSFS  
Founder**

**Effective: September 29, 2017**

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of John J. Kosinski (CRD# 719585) in addition to the information contained in East End Financial Group, Inc. ("EEFG" or the "Advisor", CRD# 110584) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the EEFG Disclosure Brochure or this Brochure Supplement, please contact us at 631-727-8111.

Additional information about Mr. Kosinski is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 719585.



## Item 2 – Educational Background and Business Experience

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John J. Kosinski, born in 1950, is dedicated to advising Clients of EEFG as the Founder. Mr. Kosinski earned a Masters of Science in Financial Services (MSFS) from The American College in 1998. Mr. Kosinski also earned a Political Science Degree from Villanova University in 1972. Additional information regarding Mr. Kosinski's employment history is included below.

### Employment History:

Founder, East End Financial Group, Inc.	03/1992 to Present
Investment Advisor Representative, American Portfolio Advisors, Inc.	06/2010 to Present
Registered Representative, American Portfolios Financial Services, Inc.	03/2003 to Present

### Chartered Financial Consultant® (ChFC®)

The Chartered Financial Consultant® (ChFC®) program prepares you to meet the advanced financial planning needs of individuals, professionals and small business owners. You'll gain a sustainable advantage in this competitive field with in-depth coverage of the key financial planning disciplines, including insurance, income taxation, retirement planning, investments and estate planning. The ChFC® requires three years of full-time, relevant business experience, nine two-hour course specific proctored exams, and 30 hours of continuing education every two years. Holders of the ChFC® designation must adhere to The American College's Code of Ethics.

#### Program Objectives:

- Function as an ethical, competent and articulate practitioner in the field of financial planning
- Demonstrate mastery of the core financial planning knowledge required of a CERTIFIED FINANCIAL PLANNER™ by passing the CFP® certification exam
- Utilize the intellectual tools and framework needed to maintain relevant and current financial planning knowledge and strategies.
- Apply financial planning theory and techniques through the development of case studies and solutions
- Apply in-depth knowledge in a holistic manner from a variety of disciplines; namely, estate planning, retirement planning or non-qualified deferred compensation.

### The Chartered Life Underwriter (CLU®)

The Chartered Life Underwriter® (CLU®) is a designation of insurance expertise, helping gain a significant advantage in a competitive market. This course of study helps by providing in-depth knowledge on the insurance needs of individuals, business owners and professional clients.

#### Program Learning Objectives:

- Provide guidance to clients on types and amounts of life insurance needed
- Make recommendations on aspects of risk management, including personal and business uses of a variety of insurance solutions
- Provide guidance to clients on legal aspects of life insurance contracts and beneficiaries
- Assist clients in making decisions about estate planning, including proper holding of assets and title to assets, as well as the implications of various wills and trust arrangements on financial, retirement and succession planning issues
- Provide a holistic and comprehensive approach to addressing the insurance planning needs of their clients

## Item 3 – Disciplinary Information

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

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes;

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<http://www.eastendfinancialgroup.com>

fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Kosinski.***

However, we do encourage you to independently view the background of Mr. Kosinski on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 719585.

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

##### Investment Adviser Affiliation

Mr. Kosinski is also an Investment Advisor Representative of American Portfolio Advisors, Inc. (CRD# 125112), an unaffiliated registered investment advisor (“APA”). This activity is done separate and apart from his role with EEFG. As a result, this could cause a conflict of interest as Mr. Kosinski may be unavailable to service Client accounts during normal trading hours.

##### Broker-Dealer Affiliation

Mr. Kosinski is also a Registered Representative of American Portfolio Financial Services, Inc. (“APFS”). APFS is a registered broker-dealer (CRD# 18487), member FINRA, SIPC. In Mr. Kosinski’s separate capacity as a Registered Representative, Mr. Kosinski will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Kosinski. For certain legacy Clients that have assets invested in commissionable share classes through EEFG, the Registered Representative may also receive a trail commission (12b-1 fee) on those investments. The Advisor does not offer such a structure to new Clients.

##### Insurance Agency Affiliations

Mr. Kosinski is also a licensed insurance professional under Kosinski Associates, Inc., an affiliate of the Advisor. Implementations of insurance recommendations are separate and apart from Mr. Kosinski’s role with EEFG. As an insurance professional, Mr. Kosinski may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Kosinski is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Kosinski or the Advisor.

##### Gwen L Kosinski Foundation

Mr. Kosinski, in his separate capacity, is the Chief Financial Officer of the Gwen L Kosinski Foundation, a 501(c)(3) organization. Mr. Kosinski is not compensated in this position. Mr. Kosinski spends less than an hour per month in this capacity.

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#### **Item 5 – Additional Compensation**

Mr. Kosinski has additional business activities that are detailed in Item 4 above.

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#### **Item 6 – Supervision**

Mr. Kosinski serves as the Founder of EEFG and is supervised by Annmarie Zilnicki, the Chief Compliance Officer. Ms. Zilnicki can be reached at 631-727-8111.

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

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

**for**

**Joseph J. Kosinski, ChFC®**  
**Partner**

**Effective: September 29, 2017**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Joseph J. Kosinski (CRD# 4633352) in addition to the information contained in the East End Financial Group, Inc. (“EEFG” or the “Advisor”, CRD# 110584) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the EEFG Disclosure Brochure or this Brochure Supplement, please contact us at 631-727-8111.

Additional information about Mr. Kosinski is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 4633352.

## Item 2 – Educational Background and Business Experience

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Joseph J. Kosinski, ChFC®, born in 1979, is dedicated to advising Clients of EEFG as a Partner. Mr. Kosinski earned a Bachelors in Mechanical Engineering from Villanova University in 2001. Additional information regarding Mr. Kosinski's employment history is included below.

### Employment History:

Partner, East End Financial Group, Inc.	09/2005 to Present
Registered Representative, American Portfolios Financial Services, Inc.	09/2005 to Present
Inside Wholesaler, John Hancock Funds, LLC	07/2004 to 09/2005
Registered Assistant, Wachovia Securities, LLC	10/2003 to 06/2004

### Chartered Financial Consultant® (ChFC®)

The Chartered Financial Consultant® (ChFC®) program prepares you to meet the advanced financial planning needs of individuals, professionals and small business owners. You'll gain a sustainable advantage in this competitive field with in-depth coverage of the key financial planning disciplines, including insurance, income taxation, retirement planning, investments and estate planning. The ChFC® requires three years of full-time, relevant business experience, nine two-hour course specific proctored exams, and 30 hours of continuing education every two years. Holders of the ChFC® designation must adhere to The American College's Code of Ethics.

#### Program Objectives:

- Function as an ethical, competent and articulate practitioner in the field of financial planning
- Demonstrate mastery of the core financial planning knowledge required of a CERTIFIED FINANCIAL PLANNER™ by passing the CFP® certification exam
- Utilize the intellectual tools and framework needed to maintain relevant and current financial planning knowledge and strategies.
- Apply financial planning theory and techniques through the development of case studies and solutions
- Apply in-depth knowledge in a holistic manner from a variety of disciplines; namely, estate planning, retirement planning or non-qualified deferred compensation.

## Item 3 – Disciplinary Information

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

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

However, we do encourage you to independently view the background of Mr. Kosinski on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 4633352.

## Item 4 – Other Business Activities

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### Broker-Dealer Affiliation

Mr. Kosinski is also a Registered Representative of American Portfolio Financial Services, Inc. ("APFS"). APFS is a registered broker-dealer (CRD# 18487), member FINRA, SIPC. In Mr. Kosinski's separate capacity as a Registered Representative, Mr. Kosinski will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Kosinski. For certain legacy Clients that have assets invested in commissionable share classes

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318 Roanoke Avenue, Riverhead, NY 11901  
Phone: 631-727-8111 \* Fax: 631-727-1817  
<http://www.eastendfinancialgroup.com>

through EEFG, the Registered Representative may also receive a trail commission (12b-1 fee) on those investments. The Advisor does not offer such a structure to new Clients.

#### Insurance Agency Affiliations

Mr. Kosinski is also a licensed insurance professional under Kosinski Associates, Inc., an affiliate of the Advisor. Implementations of insurance recommendations are separate and apart from Mr. Kosinski's role with EEFG. As an insurance professional, Mr. Kosinski may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Kosinski is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Kosinski or the Advisor.

#### Gwen L Kosinski Foundation

Mr. Kosinski, in his separate capacity, is a Board Member of the Gwen L Kosinski Foundation, a 501(c)(3) organization. Mr. Kosinski is not compensated in this position. Mr. Kosinski spends less than an hour per month in this capacity.

### **Item 5 – Additional Compensation**

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Mr. Kosinski has additional business activities that are detailed in Item 4 above.

### **Item 6 – Supervision**

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Mr. Kosinski serves as a Partner of EEFG and is supervised by Annmarie Zilnicki, the Chief Compliance Officer. Ms. Zilnicki can be reached at 631-727-8111.

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

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

**for**

**Jack F. Kosinski**  
**Partner, Investment Advisor Representative**

**Effective: September 29, 2017**

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of Jack F. Kosinski (CRD# 5246787) in addition to the information contained in the East End Financial Group, Inc. ("EEFG" or the "Advisor", CRD# 110584) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the EEFG Disclosure Brochure or this Brochure Supplement, please contact us at 631-727-8111.

Additional information about Mr. Kosinski is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 5246787.

## Item 2 – Educational Background and Business Experience

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Jack F. Kosinski, born in 1984, is dedicated to advising Clients of EEFG as a Partner and Investment Advisor Representative. Mr. Kosinski also earned a Bachelor of Science from Indiana University in 2006. Additional information regarding Mr. Kosinski's employment history is included below.

### Employment History:

Partner, East End Financial Group, Inc.	04/2010 to Present
Registered Representative, American Portfolios Financial Services, Inc.	04/2010 to Present

## Item 3 – Disciplinary Information

---

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

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

However, we do encourage you to independently view the background of Mr. Kosinski on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 5246787.

## Item 4 – Other Business Activities

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### Broker-Dealer Affiliation

Mr. Kosinski is also a Registered Representative of American Portfolio Financial Services, Inc. ("APFS"). APFS is a registered broker-dealer (CRD# 18487), member FINRA, SIPC. In Mr. Kosinski's separate capacity as a Registered Representative, Mr. Kosinski will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Kosinski. For certain legacy Clients that have assets invested in commissionable share classes through EEFG, the Registered Representative may also receive a trail commission (12b-1 fee) on those investments. The Advisor does not offer such a structure to new Clients.

### Insurance Agency Affiliations

Mr. Kosinski is also a licensed insurance professional under Kosinski Associates, Inc., an affiliate of the Advisor. Implementations of insurance recommendations are separate and apart from Mr. Kosinski's role with EEFG. As an insurance professional, Mr. Kosinski may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Kosinski is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Kosinski or the Advisor.

### Gwen L Kosinski Foundation

Mr. Kosinski, in his separate capacity, is a Board Member of the Gwen L Kosinski Foundation, a 501(c)(3) organization. Mr. Kosinski is not compensated in this position. Mr. Kosinski spends less than an hour per month in this capacity.

## Item 5 – Additional Compensation

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Mr. Kosinski has additional business activities that are detailed in Item 4 above.



## **Item 6 – Supervision**

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Mr. Kosinski serves as a Partner and Investment Advisor Representative of EEFG and is supervised by Annmarie Zilnicki, the Chief Compliance Officer. Ms. Zilnicki can be reached at 631-727-8111.

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

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

**for**

**Ernest Vorpahl, CFP<sup>®</sup>**  
**Financial Planner**

**Effective: September 29, 2017**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Ernest Vorpahl (CRD# 2717578) in addition to the information contained in the East End Financial Group, Inc. (“EEFG” or the “Advisor”, CRD# 110584) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the EEFG Disclosure Brochure or this Brochure Supplement, please contact us at 631-727-8111.

Additional information about Mr. Vorpahl is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 2717578.

## Item 2 – Educational Background and Business Experience

Ernest Vorpahl, CFP®, born in 1973, is dedicated to advising Clients of EEFG as a Financial Planner. Mr. Vorpahl also earned a B.A. in Business & Economics from Lafayette College in 1995. Additional information regarding Mr. Vorpahl's employment history is included below.

### Employment History:

Financial Planner, East End Financial Group, Inc.	02/1999 to Present
Investment Advisor Representative, American Portfolio Advisors, Inc.	01/2012 to Present
Registered Representative American Portfolios Financial Services, Inc.	03/2003 to Present

### CERTIFIED FINANCIAL PLANNER™ (“CFP®”)

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP® (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP® Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- **Education** – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP® Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP® Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- **Experience** – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- **Ethics** – Agree to be bound by CFP® Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- **Continuing Education** – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- **Ethics** – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP® Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

## Item 3 – Disciplinary Information

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

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

However, we do encourage you to independently view the background of Mr. Vorpahl on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 2717578.

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

##### Investment Adviser Affiliation

Mr. Vorpahl is also an Investment Advisor Representative of American Portfolio Advisors, Inc. (CRD# 125112), an unaffiliated registered investment advisor (“APA”). This activity is done separate and apart from his role with EEFG. As a result, this could cause a conflict of interest as Mr. Vorpahl may be unavailable to service Client accounts during normal trading hours.

##### Broker-Dealer Affiliation

Mr. Vorpahl is also a Registered Representative of American Portfolio Financial Services, Inc. (“APFS”). APFS is a registered broker-dealer (CRD# 18487), member FINRA, SIPC. In Mr. Vorpahl’s separate capacity as a Registered Representative, Mr. Vorpahl will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Vorpahl. For certain legacy Clients that have assets invested in commissionable share classes through EEFG, the Registered Representative may also receive a trail commission (12b-1 fee) on those investments. The Advisor does not offer such a structure to new Clients.

##### Insurance Agency Affiliations

Mr. Vorpahl is also a licensed insurance professional under Kosinski Associates, Inc., an affiliate of the Advisor. Implementations of insurance recommendations are separate and apart from Mr. Vorpahl’s role with EEFG. As an insurance professional, Mr. Vorpahl may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Vorpahl is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Vorpahl or the Advisor.

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#### **Item 5 – Additional Compensation**

Mr. Vorpahl has additional business activities that are detailed in Item 4 above.

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#### **Item 6 – Supervision**

Mr. Vorpahl serves as a Financial Planner of EEFG and is supervised by Annmarie Zilnicki, the Chief Compliance Officer. Ms. Zilnicki can be reached at 631-727-8111.

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

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

**for**

**Mark A. Poitras, CFP®**  
**Financial Planner**

**Effective: September 29, 2017**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Mark A. Poitras (CRD# 5574063) in addition to the information contained in the East End Financial Group, Inc. (“EEFG” or the “Advisor”, CRD# 110584) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the EEFG Disclosure Brochure or this Brochure Supplement, please contact us at 631-727-8111.

Additional information about Mr. Poitras is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 5574063.

## Item 2 – Educational Background and Business Experience

Mark A. Poitras, CFP®, born in 1976, is dedicated to advising Clients of EEFG as a Financial Planner. Mr. Poitras earned a B.S. in Biology, Minor in Computer Science from Binghamton University in 1998. Additional information regarding Mr. Poitras' employment history is included below.

### Employment History:

Financial Planner, East End Financial Group, Inc.	08/2017 to Present
Investment Advisor Representative, American Portfolios Advisors, Inc.	08/2017 to Present
Registered Representative, American Portfolios Financial Services, Inc.	08/2017 to Present
Vice President, Premier Relationship Advisor, HSBC Securities (USA) Inc.	03/2013 to 01/2017
Financial Advisor, Merrill Lynch, Pierce, Fenner & Smith, Inc.	01/2011 to 03/2013
Sales Manager, PAR East Mortgage	11/1999 to 01/2011
Financial Advisor, Royal Alliance Associates	07/2010 to 01/2011
Financial Advisor, Nationwide Securities, LLC	08/2008 to 07/2010
Financial Advisor, 1717 Capital Management	07/2008 to 08/2008

### CERTIFIED FINANCIAL PLANNER™ (“CFP®”)

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP® (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP® Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- **Education** – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP® Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP® Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- **Experience** – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- **Ethics** – Agree to be bound by CFP® Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- **Continuing Education** – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- **Ethics** – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP® Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

### Item 3 – Disciplinary Information

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

However, we do encourage you to independently view the background of Mr. Poitras on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 5574063.

### Item 4 – Other Business Activities

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#### Investment Adviser Affiliation

Mr. Poitras is also an Investment Advisor Representative of American Portfolio Advisors, Inc. (CRD# 125112), an unaffiliated registered investment advisor (“APA”). This activity is done separate and apart from his role with EEFG. As a result, this could cause a conflict of interest as Mr. Poitras may be unavailable to service Client accounts during normal trading hours.

#### Broker-Dealer Affiliation

Mr. Poitras is also a Registered Representative of American Portfolio Financial Services, Inc. (“APFS”). APFS is a registered broker-dealer (CRD# 18487), member FINRA, SIPC. In Mr. Poitras’ separate capacity as a Registered Representative, Mr. Poitras will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Poitras. Neither the Advisor nor Mr. Poitras will earn ongoing investment advisory fees in connection with any products or services implemented in Mr. Poitras’ separate capacity as a Registered Representative.

#### Insurance Agency Affiliations

Mr. Poitras is also a licensed insurance professional under Kosinski Associates, Inc., an affiliate of the Advisor. Implementations of insurance recommendations are separate and apart Mr. Poitras’ role with EEFG. As an insurance professional, Mr. Poitras may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Poitras is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Poitras or the Advisor.

#### Volunteer

Mr. Poitras volunteers at SAG Harbor Volunteer Ambulance, located at 16C Columbia Street, Sag Harbor, NY, 11963 since 11/2004. Mr. Poitras devotes approximately 6 hours per month in this capacity, none of which are during securities trading hours. Mr. Poitras is an advanced emergency technician as well as an instructor for the Corp and Suffolk county

#### Chairman

Mr. Poitras is also the Chairman of the North Haven Village Zoning Board of Appeals, located in North Haven since 03/2007. Mr. Poitras hears applications from local residents for variances to the North Haven Village zoning laws. Mr. Poitras devotes approximately 2 hours per month in this capacity, none of which are during securities trading hours.

#### Board Member

Mr. Poitras is a member and sits on the board of the Sag Harbor Lions Club, located at PO Box 158, Sag Harbor, NY, since 10/2013. The Sag Harbor Lions Club is a civic organization devoted to assisting people who are blind or sight impaired as well as anyone else deemed in need. Mr. Poitras' role is to assist in fundraising efforts,



volunteer activities and attend meetings. Mr. Poitras devotes approximately 2 hours per month in this capacity, none of which are during securities trading hours.

#### **Item 5 – Additional Compensation**

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Mr. Poitras has additional business activities that are detailed in Item 4 above.

#### **Item 6 – Supervision**

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Mr. Poitras serves as a Financial Planner of EEFG and is supervised by Annmarie Zilnicki, the Chief Compliance Officer. Ms. Zilnicki can be reached at 631-727-8111.

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

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

**for**

**Jeffrey R. Connolly, CFA<sup>®</sup>  
Research Analyst**

**Effective: September 29, 2017**

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of Jeffrey R. Connolly (CRD# 5990424) in addition to the information contained in the East End Financial Group, Inc. ("EEFG" or the "Advisor", CRD# 110584) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the EEFG Disclosure Brochure or this Brochure Supplement, please contact us at 631-727-8111.

Additional information about Mr. Connolly is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 5990424.

## Item 2 – Educational Background and Business Experience

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Jeffrey R. Connolly, CFA®, born in 1986, is dedicated to advising Clients of EEFG as a Research Analyst. Mr. Connolly earned a B.A. from College of the Holy Cross in 2008. Additional information regarding Mr. Connolly's employment history is included below.

### Employment History:

Research Analyst, East End Financial Group, Inc.	07/2017 to Present
Registered Representative, American Portfolios Financial Servicesm, Inc.	07/2017 to Present
Research Analyst, Value Line LLC	07/2016 to 07/2017
Director Equity Research, Clarksons Platou Securities, Inc.	01/2015 to 07/2016
Vice President Equity Research, Mizuho Securities USA	11/2013 to 12/2014
Research Analyst, Brean Capital	10/2012 to 11/2013
Research Analyst, Sidoti & Company	10/2011 to 10/2012

### Chartered Financial Analyst ("CFA®")

The Chartered Financial Analyst (CFA) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute — the largest global association of investment professionals.

There are currently more than 138,000 CFA charterholders working in 134 countries. To earn the CFA charter, candidates must: 1) pass three sequential, six-hour examinations; 2) have at least four years of qualified professional investment experience; 3) join CFA Institute as members; and 4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

### High Ethical Standards

The CFA Institute Code of Ethics and Standards of Professional Conduct, enforced through an active professional conduct program, require CFA charterholders to:

- Place their clients' interests ahead of their own
- Maintain independence and objectivity
- Act with integrity
- Maintain and improve their professional competence
- Disclose conflicts of interest and legal matters

### Global Recognition

Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study per level). Earning the CFA charter demonstrates mastery of many of the advanced skills needed for investment analysis and decision making in today's quickly evolving global financial industry. As a result, employers and clients are increasingly seeking CFA charterholders—often making the charter a prerequisite for employment.

Additionally, regulatory bodies in over 30 countries and territories recognize the CFA charter as a proxy for meeting certain licensing requirements, and more than 125 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.

### Comprehensive and Current Knowledge

The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test a proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.

The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession.

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East End Financial Group, Inc.  
318 Roanoke Avenue, Riverhead, NY 11901  
Phone: 631-727-8111 \* Fax: 631-727-1817  
<http://www.eastendfinancialgroup.com>

To learn more about the CFA charter, visit [www.cfainstitute.org](http://www.cfainstitute.org).

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### Item 3 – Disciplinary Information

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

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

However, we do encourage you to independently view the background of Mr. Connolly on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 5990424.

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### Item 4 – Other Business Activities

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#### Broker-Dealer Affiliation

Mr. Connolly is also a Registered Representative of American Portfolio Financial Services, Inc. (“APFS”). APFS is a registered broker-dealer (CRD# 18487), member FINRA, SIPC. In Mr. Connolly’s separate capacity as a Registered Representative, Mr. Connolly will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Connolly. Neither the Advisor nor Mr. Connolly will earn ongoing investment advisory fees in connection with any products or services implemented in Mr. Connolly’s separate capacity as a Registered Representative.

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### Item 5 – Additional Compensation

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Mr. Connolly has additional business activities that are detailed in Item 4 above.

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### Item 6 – Supervision

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Mr. Connolly serves as a Research Analyst of EEFG and is supervised by Annmarie Zilnicki, the Chief Compliance Officer. Ms. Zilnicki can be reached at 631-727-8111.

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

## Privacy Policy

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Effective: September 29, 2017

### Our Commitment to You

East End Financial Group, Inc. ("EEFG" or the "Advisor") is committed to safeguarding the use of personal information of our Clients (also referred to as "you" and "your") that we obtain as your Investment Advisor, as described here in our Privacy Policy ("Policy").

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

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

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

### Why you need to know?

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

### What information do we collect from you?

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

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

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

### How do we protect your information?

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

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

### How do we share your information?

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

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

### Changes to our Privacy Policy

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

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

### Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at 631-727-8111.