

## **Firm Brochure**

(Part 2A of Form ADV)

### **The Estate Planners Group, LLC**

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This brochure provides you with information about the qualifications, business practices, and nature of advisory services of THE ESTATE PLANNERS GROUP, LLC, all of which should be considered before becoming an advisory client of our firm. Please contact David W. Loesser, Managing Member, if you have any questions about this narrative brochure.

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC"), or by any state securities authority.

We are registered as an Investment Adviser with the U.S. Securities and Exchange Commission. Nonetheless, registration with the Commission does not imply any level of skill or training. Additional information about our firm is available on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by using a unique identifying number, known as a CRD number. Our firm's CRD number is 124418.

September 24, 2018

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## **ITEM 2 MATERIAL CHANGES**

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### **MATERIAL CHANGES SINCE THE LAST UPDATE**

1. All legacy contracts that were signed by clients prior to 2005 were replaced in 2017 with contracts that reflect current terms and conditions. Some clients are still billed by a legacy contract. The maximum fees charged to clients with legacy contracts is outlined in Item 5.A.

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## **Item 4      ADVISORY SERVICES**

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### **A.      FIRM DESCRIPTION**

THE ESTATE PLANNERS GROUP, LLC (“EPG”) is an investment management firm, organized as a New Jersey Limited Liability Company in 2001. Its primary place of business is at 113 Pondview Drive, Washington Crossing, Pennsylvania 18977. EPG became a SEC registered investment adviser in 2017.

EPG currently provides personal portfolio management services, financial planning services and investment advisory services to individuals.

#### **1. Principal Owner**

David W. Loesser owns 100% of EPG. In addition to serving as Managing Member, David W. Loesser is an Investment Advisor Representative and the Chief Compliance Officer of EPG.

### **B.      TYPES OF ADVISORY SERVICES**

EPG provides investment management services to individuals, including high net worth individuals, whose primary objective is to preserve and enhance capital. EPG’s approach is to help each client individually establish and then meet specific goals, while staying within the risk tolerance level indicated by each client. EPG accomplishes this by spending focused time with each client, asking questions and discussing alternative ideas with clients.

#### **1. Investment Supervisory Services**

EPG develops a personal investment policy for each client through discussions with the client concerning his or her individual goals and objectives. EPG will create and manage a portfolio based on that policy which takes into consideration the client's objectives (e.g. maximum capital preservation, growth, income, growth and income) and risk tolerance. This portfolio will typically include, but will not necessarily be limited to, investments in stocks, bonds and mutual funds. EPG will have discretionary authority to manage such advisory accounts and will not obtain approval prior to placing trades or the purchase or sale of assets. EPG will discuss and reach agreement with the client for selection (or termination) of a broker dealer and/or third-party investment manager. EPG does not receive a commission on the purchase or sale of any security and consults with the client on the selection of a broker dealer whose fee schedule and execution policies best suit the client's needs. EPG requires a written Investment Management Agreement to be signed by the client to engage EPG’s services. This agreement outlines the services rendered by EPG and the fees clients will be charged. This agreement cannot be assigned or transferred by either party without the prior consent of the other. EPG delivers a Form ADV Part 2 Brochure containing supplements describing each investment adviser

representative that will be providing advisory services to the client at or before the time when the Investment Management Agreement is signed. The client has a right to terminate the contract without penalty within 5 business days after signature.

## **2. Financial Consulting Services**

In many instances, upon meeting with a client, EPG may determine that it is appropriate to recommend a program to a client where an unrelated, third-party investment adviser manages the investments. Only third-party investment advisors who are registered with the Securities and Exchange Commission are recommended to clients. In such cases, EPG will continue to advise clients, monitor third-party managers recommended and annually review client's portfolio in light of the client's stated objectives. In addition, EPG will supply clients and potential clients with a copy of the third-party Investment Advisor's Part 2A of Form ADV.

## **3. Financial Planning**

EPG also offers financial planning services to its clients, including consideration of a client's needs with respect to trust and estate plans, long term care and insurance. EPG will advise clients whether such products are appropriate for the client through individual consultations with clients for which no fee is charged. In instances when EPG believes a client may benefit from establishing a will or trust, the client is referred to a third-party law firm qualified to create such documents. EPG does not receive any form of compensation for referring clients to law firms.

For clients who purchase an insurance product through EPG, David Loesser, the Managing Member of EPG, and/or Michael Sullivan will receive a commission from the insurance carrier, with whom they are licensed. Such commissions are based on the amount of premium charged to the client by the insurance carrier. Messrs. Loesser and Sullivan are licensed to sell insurance products in New Jersey and Pennsylvania.

## **4. Informational Seminars**

EPG also provides financial and retirement planning classes on college campuses that are open to the general public. These classes consist of providing generalized information with respect to risk management (long term care, life and disability insurance), social security planning, investments (taxable v. non-taxable) and estate management (wills, trusts).

## **C. TAILORED SERVICES**

The portfolio management advisory programs offered by EPG are based on individual needs of our clients and the suitability of products and services. Our advice is based on thorough assessment of our client's goals, objectives, investment horizon, and risk tolerance.

#### **D. WRAP FEE PROGRAMS**

EPG does not participant in nor is a sponsor of any Wrap Fee Program.

#### **E. ASSETS UNDER MANAGEMENT**

EPG manages in excess of \$151,000,000 in client assets on a discretionary basis as of December 31, 2017.

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### **ITEM 5 FEES AND COMPENSATION**

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#### **A. ADVISORY FEES**

EPG earns its fees by providing advisory services including portfolio management.

##### **1. Investment Supervisory Services Fees**

EPG requires a written Investment Management Agreement to be signed by the client prior to engagement of services. This agreement outlines the services rendered by EPG and the fees clients will be charged. It gives EPG written authority to deduct fees from custodial accounts according to the schedule below:

##### **FEE SCHEDULE**

<b>ASSETS UNDER MANAGEMENT</b>	<b>QUARTERLY FEE PERCENTAGE</b>
\$100,000 to \$500,000	.25%
\$500,001 to \$1,000,000	.225%
\$1,000,001 and higher	.20%

The quarterly fee is charged at the beginning of each quarter and computed as a percentage of the total value of the assets under management (based upon formal valuation) on the last day of the preceding quarter.

These fees do NOT include fees or other charges due to the broker dealer / custodian, any third-party investment manager, exchange traded funds or mutual funds. The fees charged by broker dealer / custodians are outlined in their separate Client Agreements. The fees charged by independent third-party investments managers are outlined in their Advisory Agreement or the Statement of Investment Selection. Mutual fund fees and expenses are described in each fund's prospectus. Mutual Fund charges will generally include a management fee, other fund expenses and a possible distribution fee. If a mutual fund also imposes sales charges, a client may pay an initial or deferred sales charge. Clients could invest in a mutual fund directly, without the services of EPG. In



that case, the client would not receive the services provided by EPG in determining whether the mutual fund is the most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by all parties to the client's individual program to fully understand the total amount of fees to be paid and to thereby evaluate the advisory services being provided.

Fees are generally due quarterly, in advance. EPG sends Client a consolidated summary of the fees for all parties employed in implementing the investment strategy for each client (broker dealer / custodians, third party investment managers, etc. in addition to EPG fees) due for the upcoming quarter and that will be pulled from the client's accounts in bulk with the quarterly performance reports. If Client selects a custodian where fees are collected on a different schedule from that outlined in the Investment Management Agreement, the effective annual fee rate shall be the same as that outlined in the Investment Management Agreement.

Our fees are negotiable. EPG reserves the right to waive or reduce management fees.

Some legacy clients still have contracts in place that give EPG written authority to deduct fees from custodial accounts according to the schedule below:

#### **FEE SCHEDULE**

<b>ASSETS UNDER MANAGEMENT</b>	<b>ANNUAL FEE PERCENTAGE</b>
\$100,000 to \$250,000	1.25%
\$250,001 to \$1,000,000	1.00%
\$1,000,001 and higher	.80%

For these legacy clients, accounts are debited with one quarter of the annual fee that is computed as a percentage of the total value of the assets under management (based upon formal valuation) at the beginning of each quarter. Fees charged by EPG on legacy accounts DO NOT include all fees paid to the broker dealer, third party investment manager, or fees and expenses charged by mutual funds or exchange traded funds.

#### **2. Financial consulting, financial planning and Informational Seminars.**

EPG does not charge for financial consulting or financial planning services. The firm does charge up to \$90 per person for financial planning classes held on college campuses. EPG estimates these fees represent .00001% of its advisory billing each year.

### **B. BILLING PROCEDURES**

#### **1. Investment Supervisory Services**

Our advisory fees for portfolio management accounts are payable quarterly in advance. The fee assessment is based upon the market value of a client's assets on the last day of the previous quarter and billed the first month of the quarter. As outlined in the terms of our Investment Management Agreement, EPG's fees are deducted directly from the client's account(s) pursuant to the client's written authorization. EPG sends the custodian written notice of the total of all fees including third party investment managers and the broker dealer as well as EPG fees to be deducted from client's account. The custodian implements the direct withdrawal of fees from the client account. EPG pays the broker dealer and third-party manager from fees collected.

These fees do not include any fees and expenses charged by mutual funds or exchange traded funds. EPG advises clients whether such products are appropriate for the client through individual consultations with clients for which no fee is charged.

The account custodian sends statements to clients at least quarterly that show all disbursements from client accounts.

#### **C. OTHER FEES & EXPENSES**

There may be additional costs associated with portfolio management. Clients may incur no-load, 12b-1 distribution fees, or certain deferred sales charges on mutual funds and expense ratios charged on exchange traded funds. Accounts can also incur certain charges imposed by other third parties in connection with investments made through the account, including but not limited to, annual maintenance fees.

EPG offers its clients sophisticated performance reporting and portfolio analysis tools as well as electronic data vaults. Clients may be charged a minimal fee for access to these electronic tools, not to exceed .02% of AUM per year.

#### **D. REFUND POLICY**

An Investment Management Agreement may be terminated without penalty if terminated by the client within five (5) business days of signing. After five (5) business days, a Management Agreement may be canceled at any time, by either party, for any reason upon not less than 30 days prior written notice. With 30 days written notice, fees will be refunded on a prorated basis.

#### **E. OTHER COMPENSATION**

EPG does not accept compensation for the sale of securities or other investment products. Individual EPG owners and employees may receive compensation for the sale of insurance products.

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**ITEM 6      PERFORMANCE BASED FEES AND SIDE-BY-SIDE  
MANAGEMENT**

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EPG does not charge performance fees and does not conduct side-by-side investment product management.

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**ITEM 7      TYPES OF CLIENTS**

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EPG manages wealth portfolios for many different types of clients. We generally provide advice to individuals, including high net-worth individuals.

**1. PORTFOLIO MANAGEMENT ACCOUNTS**

EPG requires a minimum account value of \$250,000 for advisory services; however, EPG has the discretion to waive this minimum.

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**ITEM 8      METHODS OF ANALYSIS, INVESTMENT STRATEGIES,  
AND RISK OF LOSS**

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**A.      METHODS OF ANALYSIS**

EPG utilizes a variety of investment strategies including charting, fundamental, technical, and cyclical analyses. The main sources of information we use include but are not limited to financial newspapers and magazines, inspections of corporate activities, research material prepared by others, annual reports, prospectuses, and corporate filings with the SEC.

We employ fundamental analysis as our primary method for analyzing securities to achieve the investment objectives and goals of our clients. Fundamental analysis consists of analyzing financial statements of companies, calculating financial ratios, and reviewing cyclical trends of industries in conjunction with other monetary policy indicators to assess the overall performance and profitability of companies. We may at times also employ technical analysis and charting to analyze securities.

**B.      INVESTMENT STRATEGIES**

The investment strategies of EPG are based on modern portfolio theory of diversification across non-correlated asset groups. Our primary approach for constructing and managing client portfolios uses various investment styles. The diversification process uses equities, mutual funds, bonds, and alternative investments in different companies in diverse industry sectors.

## **C. RISK OF LOSS**

Notwithstanding the method of analysis or investment strategy employed by our firm, the assets within your portfolio are subject to risk of devaluation or loss. EPG wants you to be aware that there are many different events that can affect the value of your assets or portfolio including, but not limited to, changes in financial status of companies, market fluctuations, changes in exchange rates, trading suspensions and delays, economic changes, technological changes, political developments and natural disasters.

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic, and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar received next year will be worth less than a dollar received today, eroding purchasing power at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.

- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.
- **Tax Risk:** Tax laws and regulations affecting the investment process are increasingly subject to change. Unforeseen alterations in the rules can seriously and adversely affect investment planning.

While this information provides a synopsis of the events that may affect your investments, this listing is not exhaustive. We want you to understand that there are inherent risks associated with investing and depending on the risk occurrence; you may suffer LOSS OF ALL OR PART OF YOUR PRINCIPAL INVESTMENT.

#### **D. RECOMMENDATION OF SPECIFIC TYPES OF SECURITIES**

EPG's clients may be solicited to invest in limited partnerships or other pooled investment vehicles, including affiliated funds (see Item 10 below).

The affiliated funds, which include pooled investment vehicles, invest in and trade securities, consisting principally, but not solely, of equity and equity-related securities that are traded publicly in U.S. markets as well as Real Estate and commercial mortgages. Pooled investment vehicles are sophisticated investments designed for investors who have the knowledge and experience in financial matters to evaluate the merits and risks of such investments.

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### **ITEM 9      DISCIPLINARY INFORMATION**

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The Firm and its employees have not been involved any disciplinary events related to past or present investment clients.

The Firm settled a complaint in 2016 that more than 5% of the client's assets were held in one investment. While the firm thinks the client misunderstood the 5% investment rule, EPG paid a \$6500 settlement payment as it was less than the cost of defending against this nuisance claim.

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### **ITEM 10    OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS**

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#### **A.      FINANCIAL INDUSTRY ACTIVITIES**

EPG is not a registered broker dealer and does not have an application pending to register as a broker dealer. Furthermore, none of EPG's management or supervised persons is registered as a representative or has applications pending to register as representatives of a broker dealer.

**B. FINANCIAL INDUSTRY AFFILIATIONS**

EPG is not a registered Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor and does not have an application pending to register as such. Furthermore, none of EPG's management or supervised persons is registered as, or has applications pending to register as an associated person of the foregoing entities.

**C. OTHER MATERIAL RELATIONSHIPS**

Hamilton Asset Advisers, LLC ("Hamilton Advisers") is under common control with EPG by nature of Mr. Loesser's 100% ownership of both entities, is an investment management firm providing advice to several private pooled investment vehicles. Hamilton Diversified Growth Fund, L.P. (the "Hamilton Diversified Fund"), a Delaware limited partnership, invests in securities with some options. Hamilton Opportunistic Credit Fund, LP ("Hamilton Opportunistic Credit"), a Delaware limited partnership, invests in municipal bonds. Hamilton Real Estate Fund II, LLC and Hamilton Real Estate Fund III, LLC, both Delaware LLC's, invest in commercial mortgages and real estate. Hamilton Advisers serves as the general partner to the Hamilton Diversified Fund and Hamilton Opportunistic Credit, and managing member of the two Hamilton Real Estate funds. EPG's clients may, from time to time, be solicited to invest in one or more of the Hamilton funds so long as they are qualified to invest in such fund or funds and each proposed investment is suitable for the client. . EPG forgives its management fees on client investments made in Hamilton funds .

David W. Loesser, Managing Member and Investment Adviser Representative, and Michael R. Sullivan, Investment Adviser Representative, are licensed to sell insurance products (fixed annuities: long term care, life and health insurance) through more than 15 insurance companies. They will be able to purchase products for any client in need of such services and will receive separate, yet typical, compensation for the purchase of insurance products. Clients are in no way obligated to purchase such insurance products.

David Wayne Loesser and his son, Jeffrey M. Loesser, are partners in Loesser & Sons, LLC, a real estate development company that buys, repairs and sells residential properties. EPG's clients may, from time to time, be solicited to invest in the Loesser & Sons, LLC so long as such clients of EPG are qualified to make such an investment in Loesser & Sons, LLC , and the Loesser & Sons investment being offered is a suitable investment for such clients.

EPG does not have any other arrangements that are material to its advisory or its clients with a related person who is a broker dealer, investment company, other investment

advisor, financial planning firm, commodity pool operator, commodity trading adviser or futures commission merchant, banking or thrift institution, accounting firm, law firm, insurance company or agency, pension consultant, real estate broker or dealer, or an entity that creates or packages limited partnerships.

#### **D. OTHER INVESTMENT ADVISERS**

EPG is related to Hamilton Asset Advisers, LLC (“Hamilton Advisers”), which is a SEC “umbrella” registered adviser under common control with EPG. Hamilton Advisers provides investment management services exclusively to private funds, including Hamilton Diversified Growth Fund, L.P. (the “Hamilton Diversified Fund”), a Delaware limited partnership, which invests assets in securities, Hamilton Opportunistic Credit Fund, LP (“Hamilton Opportunistic Credit”), a Delaware limited partnership, which invests in municipal bonds as well as Hamilton Real Estate Fund II, LLC and Hamilton Real Estate Fund III, LLC, both Delaware LLC’s which invest in mortgages and real estate.

EPG has set up relationships with Dedicated Senior Advisors to perform sub-advisory services for Separately Managed Accounts effective January 1, 2018. As of December 31, 2017, EPG had no assets under management as sub-advisor.

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### **ITEM 11 CODE OF ETHICS, PARTICIPATION, OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING**

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#### **A. CODE OF ETHICS**

All employees of EPG must act in an ethical and professional manner. In view of the foregoing and applicable provisions of relevant law, EPG has adopted a Code of Ethics to specify and prohibit certain types of transactions deemed to create conflicts of interest (including the potential for or the appearance of such a conflict), and to establish reporting requirements and enforcement procedures relating to personal trading by EPG personnel. EPG’s Code of Ethics, which specifically deals with professional standards, insider trading, personal trading, gifts and entertainment, and fiduciary duties, establishes ideals for ethical conduct based upon fundamental principles of openness, integrity, honesty, and trust. EPG will provide a copy of its Code of Ethics to any client or prospective client upon request.

#### **B. PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS**

As noted above, EPG is related to Hamilton Advisers which serves as a general partner and investment adviser to two private partnerships: Hamilton Diversified Growth Fund, LP and Hamilton Opportunistic Credit Fund, LP. Hamilton Diversified Growth Fund, LP pays to Hamilton Asset Advisers (i) A quarterly management fee equal to 0.375% (a 1.5% annual rate); and (ii) an annual performance profit allocation equal to twenty percent (20%) of the annual profits subject to a high water mark. Hamilton Opportunistic Credit

Fund, LP pays to Hamilton Asset Advisers (i) A quarterly management fee equal to 0.5% (a 2.0% annual rate), and (ii) a 1.75% annual performance incentive after Limited Partners receive a 5% Annual Preferred Return.

Hamilton Asset Advisers also serves as investment adviser and managing member for two private equity funds: Hamilton Real Estate Fund II, LLC and Hamilton Real Estate Fund III, LLC. ( Hamilton Real Estate Fund, LLC is closed.) Hamilton Real Estate Fund II, LLC pays to Hamilton Asset Advisers the following fees: (i) A quarterly management fee equal to 0.4625% (a 1.85% annual rate), (ii) a 2% acquisition fee on assets purchased and 1% disposition fee on assets sold by the fund, and (iii) a performance profit allocation equal to twenty five percent (25%) payable at the end of the term of the fund. Hamilton Real Estate Fund III, LLC pays to Hamilton Asset Advisers (i) A quarterly management fee equal to 0.5% (a 2.00% annual rate), and (ii) a 2% acquisition fee on assets purchased and 1% disposition fee on assets sold by the fund.

EPG is also related to Loesser & Sons. Loesser & Sons invests in Real Estate and shares profits with investors. The percentage of the profits paid to investors varies by deal, but generally ranges around 25%.

EPG may recommend to its clients that they invest in any of these Funds. EPG is not compensated for referrals, nor does the firm share in the Fund manager's compensation or the profits of Loesser & Sons.

EPG does not charge management fees on client investments placed into funds managed by Hamilton Advisers or investments in properties purchased by Loesser & Sons, LLC.

## **C. PROPRIETARY TRADING**

At times, we at EPG may buy or sell securities for our own accounts that we have also recommend to clients. Our firm will not intentionally favor a proprietary account over a client account, nor will it knowingly permit a proprietary account to trade ahead of a client account. EPG will always document any transactions that could be construed as conflicts of interest. To mitigate or remedy any conflicts of interest or perceived conflicts of interest, we will monitor our proprietary and personal trading reports for adherence to our Code of Ethics.

## **D. SIMULTANEOUS TRADING**

From time to time, representatives ("related persons") of EPG may buy or sell securities for themselves at or around the same time as clients. In any instance where similar securities are being bought or sold, we will uphold our fiduciary duty by always transacting on behalf of our client before transacting for our own benefit.

It is the policy of EPG that related persons must avoid security transactions and activities for their own accounts which might conflict with or be detrimental to the interest of the client. To the extent that related persons are aware of trades in individual issues being



considered, recommended, or traded for client accounts, the related persons will make every effort to trade in their own accounts after trades are executed for the client accounts. However, at no time is the client account trade or the related person trades expected to be of such volume as to affect the price of an individual issue.

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## **ITEM 12    BROKERAGE PRACTICES**

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### **A.    SELECTION AND RECOMMENDATION**

EPG will recommend National Financial Services, LLC BDA Fidelity Investments (“Fidelity Investments”), a registered broker dealer, or Interactive Brokers, LLC, a registered broker dealer or Jefferson National Life Insurance Company; but, the ultimate choice of custodian/broker dealer will be left to the discretion of the client prior to entering into the Agreement. Where EPG has discretion with respect to broker dealer selection, EPG will seek “best execution” for each trade, which is a combination of price, quality of execution and other factors. In making brokerage suggestions, EPG will consider a number of factors, including, without limitation: 1) clearance and settlement capabilities; 2) quality of confirmations and account statements; 3) the ability of the broker dealer to settle the trade promptly and accurately; 4) the financial standing, reputation and integrity of the broker dealer; 5) the broker dealer’s access to markets, research capabilities, market knowledge, and any “value added” characteristics; 6) EPG’s past experience with the broker dealer; 7) EPG’s past experience with similar trades; and 8) any other factors EPG deems important. Recognizing the value of these factors, clients may pay a brokerage commission in excess of that which another broker might have charged for effecting the same transaction.

We are advisory platform participants of both Fidelity Investments and Interactive Brokers, whereby custodial and brokerage services are provided to our firm. Fidelity Investments receives preferred status for our brokerage and asset custodial needs. This custodian was chosen based on their relatively low transaction fees, client services, back-office support, and product selections.

#### **1. SOFT DOLLAR BENEFITS**

EPG does not currently generate “soft dollars.” If and when it does, EPG will comply with the “safe harbor” of Section 28(e) of the Securities Exchange Act of 1934, as amended regarding “soft dollar” arrangements. Under “soft dollar” arrangements, one or more of the brokerage firms would provide or pay the costs of certain services, equipment or other items for the benefit of EPG or one or more of their affiliates in consideration of allocating to the broker firm securities transactions (with resulting commission income) made on behalf of EPG’s clients on both an agency and net basis. Although these soft dollar arrangements may benefit clients and EPG by reducing its expenses, the amount of the

Management Fees payable to EPG will not be reduced. EPG believes, however, that to the extent it makes allocations of brokerage business with soft dollar arrangements, these would generally enhance EPG's ability to obtain research, optimal execution, and other benefits to clients.

## **2. BROKERAGE FOR CLIENT REFERRALS**

When selecting or recommending broker dealers to clients, EPG does not consider whether it receives client referrals from a broker dealer or third party.

## **3. DIRECTED BROKERAGE**

Clients may direct EPG to use a particular broker dealer for custodial or transaction services on behalf of the client's portfolio. In directed brokerage arrangements the client is responsible for negotiating the commission rates and other fees to be paid to the broker. Accordingly, a client who directs brokerage should consider whether such designation may result in certain costs or disadvantages to the client, either because the client may pay higher commissions or other account fees, obtain less favorable execution, or the designation limits the investment options available to the client. The arrangement that EPG has with both Fidelity Investments and Interactive Brokers is designed to maximize efficiency and cost effectiveness. By directing brokerage arrangements, the client acknowledges that these economies of scale and levels of efficiency are generally compromised when alternative broker dealers are used. While every effort is made to treat every client equally, the fact that a client chooses to use the brokerage and/or custodial services of these alternative service providers may in fact result in a certain degree of delay in executing trades and otherwise effectively managing the account(s).

## **B. ORDER AGGREGATION**

EPG may, at times, aggregate buy and sell orders of securities for the purpose of obtaining the best pricing averages and minimizing trading costs. This practice is reasonably likely to result in administrative convenience to EPG. Clients also benefit with better purchase or sell execution prices, lower commission expenses or beneficial timing of transactions or a combination of these and other factors. Our policies and procedures mandate aggregating multiple orders. Aggregate orders will be allocated to accounts in a systematic non-preferential manner.

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# **ITEM 13 REVIEW OF ACCOUNTS**

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## **A. PERIODIC REVIEWS**

EPG's criterion for reviewing client accounts is as follows:

Client accounts are reviewed quarterly. In each review, the performance of the portfolio is compared with client's goals and risk tolerance. Any recommendations developed from

the review with respect to reallocation or rebalancing in order to maintain suitability and risk tolerance are communicated to the client by phone or in person. The investment consultant for the client and /or the Managing Member of EPG, David Loesser, will meet with each client at least annually to review the client's investment goals, changes in the client's financial situation, account performance and any reallocation or rebalancing recommendations.

**B. INTERMITTENT REVIEW FACTORS**

Intermittent reviews may be triggered by substantial market fluctuation, economic or political events, or by changes in your financial status (such as retirement, termination of employment, relocation, or inheritance).

**C. CLIENT REPORTS**

Client will receive account statements from the Custodian according to the terms of the contract with the Custodian. Clients with 401(k) or 403 (b) accounts receive quarterly statements from the custodian. The statements include a description of the assets held, the value of the assets as of the end of the period, the change in the value of the assets during the period and transactions during the period. EPG also releases quarterly financial reports that include fee disclosures.

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**ITEM 14 CLIENT REFERRALS AND OTHER COMPENSATION**

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**A. ECONOMIC BENEFITS FOR ADVISORY SERVICES RENDERED**

EPG does not receive and does not have any arrangement to receive economic benefits (such as sales awards or other prizes) from any non-client as a result of providing investment advice or other advisory services to clients.

**B. COMPENSATION FOR CLIENT REFERRALS**

Neither the Firm nor any of its related persons pay any compensation directly or indirectly to any person who is not a supervised person for client referrals.

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**ITEM 15 CUSTODY**

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**A. CUSTODIAN OF ASSETS**

EPG does not have custody of any client funds or securities. Our firm has the ability to debit client accounts for fees and charges but no authority to write checks or transfer funds to third parties. Unless instructed otherwise by a client, Fidelity Investments, Jefferson National Insurance Company or Interactive Brokers is the custodian of your non-401(k) portfolio assets. All 401(k) or 403(b) assets are held with the custodian selected by the third-party administrator.

EPG's related party, Hamilton Asset Advisers, has custody of your funds and securities in its capacity as the general partner of the Hamilton Diversified Growth Fund, LP and Hamilton Opportunistic Credit Fund, LP; and as General Manager of Hamilton Real Estate Fund II, LLC and Hamilton Real Estate Fund III, LLC. The cash assets for the Hamilton funds are held in dual signature accounts at Wells Fargo Bank. The vast majority of the physical assets of the Hamilton Diversified Growth Fund, LP and Hamilton Opportunistic Credit Fund, LP are held at Interactive Brokers where withdrawals can only be released to a bank account in the name of the Fund. A small number of assets for Hamilton Diversified Growth Fund, LP which could not be held at Interactive Brokers are held at Fidelity Investments.

International Fund Management, LLC, an independent third-party accounting firm, is responsible for the accounting, calculates the fees due to Hamilton Asset Advisers and acts as gatekeeper for the three funds: Hamilton Diversified Growth Fund, LP. Hamilton Opportunistic Credit Fund, LP and Hamilton Real Estate Fund III, LLC. PartnersAdmin, LLC, an independent third-party accounting firm, is responsible for the accounting for Hamilton Real Estate Fund II, and calculates the fees due to Hamilton Asset Advisers. Hamilton Real Estate Fund II is being audited by Spicer Jeffries, LLP, a firm specializing in the auditing of hedge funds and private equity funds. Hamilton Diversified Growth Fund, LP, Hamilton Opportunistic Credit Fund, LP and Hamilton Real Estate Fund III, LLC are audited by Sanville and Co., also a firm specializing in the auditing of hedge funds and private equity funds.

## **B. ACCOUNT STATEMENTS**

Although we are your adviser, your monthly account statements will be mailed by Fidelity Investments or Interactive Brokers or such other broker-dealers that a client may elect to use. Broker Dealers must issue a monthly statement. When you receive these statements, please review them carefully. Please compare asset values, holdings, and fees on your statement to that in the fee report issued by EPG.

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## **ITEM 16 INVESTMENT DISCRETION**

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### **A. DISCRETIONARY AUTHORITY**

It is EPG's customary procedure to have full discretionary authority in order to supervise and direct the investments of your accounts. You grant this authority upon execution of our Investment Management Agreement. This authority is for the purpose of making and implementing investment decisions, without your prior consultation. All investment decisions are made in accordance with your stated investment objectives. You may inform our firm of restrictions that you would like to impose regarding investment strategies or types of securities transactions within your account(s).

## **1. STANDARD LIMITATIONS**

Our discretionary authority does not give authority to take or have possession of any assets in your account or to direct delivery of any securities or payment of any funds held in the account to our firm. Furthermore, our authority by agreement does not allow us to direct the disposition of such securities or funds to anyone except you-the account owner.

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## **ITEM 17 VOTING CLIENT SECURITIES**

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EPG will not vote nor advise clients how to vote proxies for securities held in client accounts. Fiduciary obligations of prudence and loyalty require an investment adviser with proxy voting responsibility to vote proxies on issues that affect the value of the client's investment.

EPG will not take nor be required to take any action or render any advice with respect to the voting of proxies solicited by or with respect to the issuers of securities in which assets of the client's account may be invested in occasionally. Furthermore, EPG will not be required to take any action or render any advice with respect to any securities held in any client's accounts that are named in or subject to class action lawsuits. EPG will however, forward to you any information received by our firm regarding proxies and class action legal matters involving any security held in your account.

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## **ITEM 18 FINANCIAL INFORMATION**

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### **A. BALANCE SHEET REQUIREMENT**

EPG does not require or solicit prepayment of more than \$500 in advisory fees per client, six months or more in advance.

### **B. DISCRETIONARY AUTHORITY**

EPG has discretionary authority to manage client assets and by client's written authority, has the ability to deduct advisory fees payable to it as noted in Item 15.

The firm does not have any financial impairment that will preclude it from meeting contractual commitments to clients.

### **C. BANKRUPTCY PETITION**

The Firm has not been the subject of a bankruptcy petition at any time during the last 10 years.

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## **PRIVACY POLICY**

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EPG does not disclose nonpublic personal information about its clients or former clients to any persons other than as described below. EPG collects information about its clients (such a name, address, social security number, assets and income) from discussions with clients, from documents that clients may deliver to EPG (such as account applications) and in the course of providing services. In order to service its client accounts and effect client transactions, EPG may provide client personal information to its affiliates and to firms that assist it in servicing client accounts and which have a need for such information. EPG does not otherwise provide information about its clients to outside firms, organizations or individuals except as required by law. Any party that receives this information will be required to use it only for the services it renders and as allowed by applicable law or regulations, and is not permitted to share or use this information for any other purpose.

## **Brochure Supplement**

(Part 2B of Form ADV)

This brochure supplement provides information about the Investment Adviser Representatives (IARs) of The Estate Planners Group, LLC (“EPG”). This information supplements the EPG Firm Brochure. You should have received a copy of that brochure. Please contact David Loesser at 215-321-4410, if you did not receive the brochure of the Firm. You can also contact Mr. Loesser if you have any questions about the content of this supplement. Additional information about the IARs delineated within this supplement is available on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this website by using the IAR’s CRD number as listed herein.

### **The Estate Planners Group, LLC**

**113 Pondview Drive  
Washington Crossing, PA 18977**

**Telephone: 215-321-4410**

**Fax: 215-321-4405**

**Email:**

[Dave@epgnow.net](mailto:Dave@epgnow.net)

[www.epgnow.net](http://www.epgnow.net)

**March 22, 2018**

**A. GENERAL REQUIREMENTS**

Generally, EPG requires employees to hold a college or advanced degree or have relevant working experience in the securities industry. Any employee of EPG acting in a representative capacity will be appropriately licensed or registered as such.

**B. INVESTMENT ADVISER REPRESENTATIVE INFORMATION**

We currently have three (3) investment adviser representatives employed by EPG, as follows:



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## DAVID WAYNE LOESSER, CFP

### INVESTMENT ADVISER REPRESENTATIVE

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CRD No. 3177524

Year of Birth: 1958

#### ITEM 2 EDUCATION AND BUSINESS EXPERIENCE

David Loesser established The Estate Planners Group (“EPG”) in 2002, and he serves as the President of that company. He has been in the financial services industry since 1996, and has over twenty years of experience in executive management positions. David is an ASPPA member and a Certified Financial Planner. In 2008, David was recognized as one of “America’s Top Financial Planners” by SLD Industries, Inc, and he is listed in the 2008 edition of their “Guide to America’s Top Financial Planners. Before EPG, David worked at several financial firms, including Freedom Financial, Prudential Financial, and Faith Financial Planners. He is a Registered Investment Advisor and a Licensed Insurance Producer in New Jersey and Pennsylvania. He currently holds a Series 66 license and is a notary public in Pennsylvania. In 1980, David graduated with high honors from The College of New Jersey. Shortly afterwards, he attained two master’s degrees, and later earned the prestigious Certified Financial Planner designation. In January 2013, David completed an Executive MBA in Asset and Wealth Management from Carnegie Mellon University and HEC Lausanne University (Switzerland) and the Swiss Finance Institute.

##### Educational Background:

Executive MBA in Asset and Wealth Management: Carnegie Mellon University & HEC Lausanne (2011-2013)

Doctoral Studies, Regent University, September 1995 – February 1997.

MDiv, Biblical Theological Seminary, Hatfield, PA, 1989.

M.A., Biblical Theological Seminary, Hatfield, PA, May 1989.

B.A., Trenton State College, Trenton, NJ, December 1980.

##### Professional Designation:

Certified Financial Planner (CFP)

##### Business Experience:

##### **Financial Adviser/Investment Adviser Representative**

The Estate Planners Group

2001 – Present

##### **Adjunct Professor**

Philadelphia Biblical University

1991 - 2007

##### **Registered Representative**

Freedom Financial Inc./Freedom Asset Management 2002- 2002

***Financial Advisory Agent***

Pruco Securities Corporation 1998 - 2001

***Financial Consultant and Insurance Agent***

Maclean Agency 1997 - 1998

**ITEM 3 DISCIPLINARY INFORMATION**

None. David Wayne Loesser, Investment Adviser Representative does not have any legal or disciplinary events material to a client's or prospective client's evaluation.

**ITEM 4 OTHER BUSINESS ACTIVITIES**

David Wayne Loesser sells insurance products to clients, on behalf of a number of insurance carriers. The time spent on selling insurance accounts for approximately 50 hours per year.

Mr. David Loesser is President and partner for Loesser & Sons, LLC, a real estate development company that specializes in the purchase, repair and sale of residential properties.

**ITEM 5 ADDITIONAL COMPENSATION**

David Wayne Loesser, Investment Adviser Representative, is affiliated with Hamilton Asset Advisers, which is the general partner of Hamilton Diversified Growth Fund, LP and Hamilton Opportunistic Credit Fund, LP. Hamilton Asset Advisers is the managing member for Hamilton Real Estate Fund II, LLC and Hamilton Real Estate Fund III, LLC. Mr. Loesser receives compensation as the managing member of Hamilton Asset Advisers and as a Founding Limited Partner in Hamilton Real Estate Fund III.

As noted in Item 4 above, David Wayne Loesser is licensed to sell insurance products (fixed annuities: long term care, life and health insurance) through more than 15 insurance companies. He will be able to purchase products for any client in need of such services and will receive separate, yet typical, compensation for the purchase of insurance products. Clients are in no way obligated to purchase such insurance product services.

**ITEM 6 SUPERVISION**

David Wayne Loesser is the Managing Member, and serves as the Firm's Chief Compliance Officer and one of EPG's Investment Adviser Representatives. Mr. Loesser will periodically review the Firm's guidelines and advisory services it provides. He will review clients' applications and suitability information for conformity with the Firm's account establishment policies and procedures.

If you have any questions, Mr. Loesser can be reached by phone at 215-321-4410.

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## MICHAEL RAYMOND SULLIVAN, CIMA

### INVESTMENT ADVISER REPRESENTATIVE

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CRD No. 2962858

Year of Birth: 1954

#### ITEM 2 EDUCATION AND BUSINESS EXPERIENCE

Michael is Vice President of Advisory Services for The Estate Planners Group. He holds the Certified Investment Management Analyst<sup>sm</sup> designation administered by Investment Management Consultants Association<sup>sm</sup> and taught in conjunction with The Wharton School, University of Pennsylvania. Michael is also a Registered Investment Advisor and licensed producer with the Department of Banking and Insurance in both New Jersey and Pennsylvania. Michael began his career with Prudential in 1996 and has been with The Estate Planners Group since its inception. He has held Series 6, 7, 66 and 65 security licenses. Dr. Sullivan earned a Bachelor of Science from Cairn University, Master of Arts from Columbia International University and Doctor of Ministry from Regent University. Michael has held executive positions in both non-profit and for-profit organizations and is skilled at helping both individuals and organizations meet their strategic financial goals.

*Educational Background:*

DMin, Regent University, May 2001.

M.S., Columbia International University, May 1982.

B.S., Cairn University, May 1978.

*Professional Designation:*

Certified Investment Management Consultant (CIMA) 2012

*Business Experience:*

***Financial Adviser***

The Estate Planners Group

2004 – Present

***Senior Staff Advisor***

Washington Crossing United Methodist Church

1998 – 2007

***Financial Marketing and Administrative Support***

Maclean Agency – Prudential

1996 – 1998

#### ITEM 3 DISCIPLINARY INFORMATION

None. Dr. Michael R. Sullivan, Investment Adviser Representative does not have any legal or disciplinary events material to a client's or prospective client's evaluation.

#### **ITEM 4      OTHER BUSINESS ACTIVITIES**

Dr. Michael R. Sullivan sells insurance products to clients, on behalf of a number of insurance carriers. The time spent on selling insurance accounts for approximately 50 hours per year.

#### **ITEM 5      ADDITIONAL COMPENSATION**

Dr. Michael R. Sullivan, Investment Adviser Representative, does not receive any economic benefit from any third party for providing advisory services.

As noted in Item 4 above, Dr. Michael R. Sullivan is licensed to sell insurance products (fixed annuities: long term care, life and health insurance) through more than 15 insurance companies. He will be able to purchase products for any client in need of such services and will receive separate, yet typical, compensation for the purchase of insurance products. Clients are in no way obligated to purchase such insurance product services.

#### **ITEM 6      SUPERVISION**

Dr. Michael R. Sullivan is one of EPG's Investment Adviser Representatives. Dr. Sullivan can be reached by phone at 215-321-4410. He will review clients' applications and suitability information for conformity with the Firm's account establishment policies and procedures. Dr. Sullivan's activities are subject to review by David Wayne Loesser, the Firm's Chief Compliance Officer.

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**JEFFREY M. LOESSER**

**INVESTMENT ADVISER REPRESENTATIVE**

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CRD No. 6580161

Year of Birth: 1987

**ITEM 2 EDUCATION AND BUSINESS EXPERIENCE**

Jeffrey is an Investment Adviser Representative for The Estate Planners Group (EPG). Jeffrey has been working full time for The Estate Planners Group since 2012, serving as a Financial Advisor in training under David Loesser. He attained his Life & Health Insurance License in 2014 and attained his Series 65 securities license in 2016.

Before working with EPG, Jeff worked as a Youth Director at the Ocean City Tabernacle, in Ocean City, NJ. Jeff studied at Eastern University, graduating in 2009 with a double major in Business Management and Youth Ministry, along with a minor in Biblical Studies.

*Educational Background:*

B.A. B.S., Eastern University, 2009.

*Business Experience:*

***Financial Adviser***

The Estate Planners Group 2012 – Present

***Ocean City Tabernacle***

Youth Coordinator 2010 – 2012

***North Hampton Presbyterian Church***

Youth Pastor 2009 – 2010

**ITEM 3 DISCIPLINARY INFORMATION**

None. Mr. Jeffrey Loesser does not have any legal or disciplinary events material to a client's or prospective client's evaluation.

**ITEM 4 OTHER BUSINESS ACTIVITIES**

Mr. Jeffrey Loesser is a partner for Loesser & Sons, LLC, a real estate development company that specializes in the purchase, repair and sale of residential properties.

**ITEM 5 ADDITIONAL COMPENSATION**

Mr. Jeffrey Loesser, Investment Adviser Representative, does not receive any economic benefit from any third party for providing advisory services.

## **ITEM 6      SUPERVISION**

Mr. Jeffrey Loesser is one of EPG's Investment Adviser Representatives. Mr. Jeffrey Loesser can be reached by phone at 215-321-4410.

He will review clients' applications and suitability information for conformity with the Firm's account establishment policies and procedures. Mr. Jeffrey Loesser's activities are subject to review by David Wayne Loesser, the Firm's Chief Compliance Officer.