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**Brochure Form ADV Part II**

**Dated: March 31, 2011**

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This Brochure provides information about the qualifications and business practices of Epoch Consulting Group. If you have any questions about the contents of this Brochure, please contact us at one of the telephone numbers and/or our email address shown above. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Epoch Consulting Group is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

Additional information about Epoch Consulting Group also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

On July 28, 2010, the United State Securities and Exchange Commission published “Amendments to Form ADV” which amends the disclosure document that we provide to clients as required by SEC Rules. This Brochure dated March 31, 2011 is a new document prepared according to the SEC’s new requirements and rules. As such, this Document is materially different in structure and requires certain new information that our previous brochure did not require.

In the future, this Item will discuss only specific material changes that are made to the Brochure and provide clients with a summary of such changes. We will also reference the date of our last annual update of our brochure.

In the past we have offered or delivered information about our qualifications and business practices to our clients every quarter. This practice will continue and pursuant to new SEC Rules, we will ensure that you receive a summary of any materials changes to this and subsequent Brochures within 120 days of the close of our business’ fiscal year. We may further provide other ongoing disclosure information about material changes as necessary.

We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, our Brochure may be requested by contacting Yvette Clark at (707) 524-5800 or email at [yclark@epochcq.com](mailto:yclark@epochcq.com).

Additional information about Epoch Consulting Group is also available via the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC’s website also provides information about any persons affiliated with Epoch Consulting Group who are registered, or are required to be registered, as investment adviser representatives of Epoch Consulting Group.

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**EPOCH CONSULTING GROUP** is an independent investment advisor owned by Rick L. Tasker. By independent we mean the firm is not affiliated with a broker-dealer, mutual fund management complex, pension administrator/recordkeeper or other entity that is compensated for services provided to retirement plans and individuals. The firm was founded in 2004 and the investment advisory services provided include: (1) Pension Consulting; (2) Private Wealth Management; and (3) Benchmark Reporting.

Pension Consulting Services are provided to employer sponsored retirement plans for both “for-profit” and “non-profit” organizations. We service defined contribution (e.g., 401(k), profit sharing, and money purchase pension), defined benefit, 403(b), 457, 401(a) and executive deferred compensation plans. We provide both fiduciary and non-fiduciary services, which are clearly identified in our service contract. Fiduciary services generally include the following: IPS development and/or review; investment selection and monitoring; recommendations for model portfolio allocations and rebalancing; and participant investment advice. Non-fiduciary services typically include: plan design consulting and/or review; vendor search and fee benchmarking services; plan committee education and compliance assistance; and participant investment education and enrollment support.

We primarily serve four key areas of plan management and operation: Fiduciary Oversight; Best Practices; Corporate Governance, and Participant Communication. Services provided may include:

#### Fiduciary Oversight

- Provide important regulatory updates
- Analyze investment fees and expenses
- Annual benchmarking services
- Monitor fiduciary risks affecting plan and trustees
- Provide fiduciary training
- Conduct vendor searches (RFPs & RFIs)

#### Best Practices

- Monitor important plan metrics (i.e., participation rates, deferral rates, participant behavior, etc.)
- Monitor programs in place to ensure metrics are moving in the right direction
- Evaluate the objectives of company and its plan
- Establish prudent process

#### Corporate Governance

- Attend quarterly meetings, create agendas, and preparation of notes/minutes
- Select & monitor plan investment offerings
- Create & maintain Investment Policy Statement
- Optimize employee appreciation
- Provide custom model portfolio strategies

#### Participant Communication

- Provide investment newsletters
- Optimize employee communication
- Conduct participant investment education meetings
- Provide plan enrollment support

Epoch serves as a co-fiduciary depending on the services provided. We have no financial relationship with any vendor and we receive no direct or indirect compensation in connection with such services. Fees for services are paid solely by the client. See (Item 5 – Fees and Compensation) for information on fees. We work with regional and national vendors, and support both “bundled” and un-bundled” platforms. Clients are located throughout the United States and there is no minimum account size. Total pension assets we consult on were \$320,639,000 as of December 31, 2011.

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

#### *Non-Discretionary Services*

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

- Assessment of investment needs and objectives
- Investment policy planning
- Selection of suitable investment vehicles
- Development of asset allocation strategy
- Selection of appropriate investment managers
- Monitoring of investment managers
- Monitoring of portfolio
- Account rebalancing
- Performance statements

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

We do not maintain custody of your assets. However, under government regulations, we are deemed to have custody if you grant us authority to deduct our advisory fees directly from your account. See (Item 15 – Custody) for more information. Our services are customized for each client and you may impose restrictions on the types of securities, amount, industries, countries, etc. we place in your account. No-load mutual funds may be institutional class, which are not typically available to retail investors. Accounts are managed on a non-discretionary basis. Non-discretionary assets managed by Epoch were \$8,767,000 as of December 31, 2010.

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

#### *Discretionary Services*

Epoch may utilize the sub-advisory services offered by Envestnet Asset Management, Inc. in managing discretionary assets. Through Envestnet, you have access to a wide variety of investment management solutions that range from "aggressive growth" to "capital preservation". Their programs generally utilize no-load mutual funds, ETFs, separate account managers and alternative investments. Envestnet assists us in conducting due diligence on portfolio managers, administering accounts, managing trading, providing daily reconciliation of trading activity, and providing online account information, quarterly performance reporting, and other support services. No-load mutual funds may be institutional class, which are not typically available to retail investors. Due to account minimums, some separate account managers and alternative investments may only be available to our clients through Envestnet.

We utilize the research services of Envestnet to assist with the selection of portfolio managers. We furnish you with information on each recommended manager, including fees paid to them, and you have the opportunity to approve, or disapprove, their selection. You may impose restrictions on the types of securities, amount, industries, countries, etc. they place in your account.

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

Discretionary assets managed by Epoch were \$1,256,000 as of December 31, 2010.

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

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

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

Benchmark Reporting Services is a reporting service that provides quarterly reporting on retirement plan investment performance, prospectus expense data and metrics tied to investment risk, and compared to peer investment categories, indices and similar retirement plans. The services are “non-fiduciary” reporting services. Clients may be located throughout the United States. Total plan assets receiving benchmark services were generally unknown and not applicable in determining advisor fees as of December 31, 2010.

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

#### *Pension Consulting and Benchmark Reporting*

Fees paid to Epoch for Pension Consulting Services and Benchmark Reporting are typically charged as a fixed fee, an asset-based fee, or a combination of both. We may offer our services on a one-time or limited basis for an hourly fee at the rate of \$250/hour, or as a one-time “project-fee”. Our minimum fee is \$5,000 annually, which we may waive under certain circumstances. There is no minimum account or plan size.

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

Our asset-based fees are:

#### **Pension Consulting Fee Schedule**

- First \$2,500,000 . . . . . 0.50%
- Next \$2,500,000 . . . . . 0.40%
- Next \$5,000,000 . . . . . 0.30%
- Next \$5,000,000 . . . . . 0.15%
- Next \$10,000,000 . . . . . 0.10%
- Over \$25 million . . . . . Negotiable

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

#### *Private Wealth Management*

Management fees paid to Epoch for Private Wealth Management are typically charged either as a percentage of assets under management, fixed fee, or an hourly fee at the rate of \$250/hour. Minimum account size varies, depending on the risk profile of the client and the underlining portfolio created and/or program selected. Generally, account minimums for non-discretionary accounts is \$100,000, and \$50,000 for discretionary accounts. Minimum annual fee is \$2,500. We may waive the minimum account size and minimum annual fee. All related accounts are aggregated in determining the annual fee paid to Epoch. Fees shall be prorated for each capital contribution and withdrawal made during the applicable calendar quarter (with the exception of de minimis contributions and withdrawals). We do not require that you provide details of all personal financial obligations, insurance policies, trusts, wills, etc. to open at account.

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

Our asset-based fees are:

#### Private Wealth Management Fee Schedule

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

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

In addition to our fees, there are additional costs associated with the various investment vehicles. Investment in individual stocks, ETFs, bonds and certain no-load mutual funds incur commissions charged by the broker-dealer/custodian. While we have a duty to obtain "best execution", we do not guarantee the selected broker-dealer/custodian offers the lowest transaction costs. Transactions through brokers other than who you approve may result in additional commission or transaction charges. We do not guarantee that lower rates can not be found at other broker-dealers/custodians. Additional costs in the form of investment management fees (commonly referred to as "expense ratio"), are incurred when investing in mutual funds and ETFs. These fees typically range from 7 basis points (0.07%) to 150 basis points (1.50%). Mutual funds report performance net of their expense ratio.

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

Where we engage the services of Envestnet to manage your account, total aggregate annual fees typically range from 1.00% to 1.75% of account assets. A contract will indicate a specific fee based on the size of your account, type of account, and the fees charged by separate account managers – if the latter are used for your account. In breaking down the fees, our fee typically ranges from 0.40% to 1.00% of the market value of your account. Fees charged by separate account managers typically range from 0.25% to 0.75%. Fees paid to Envestnet generally range from 0.25% to 0.35%. Brokerage and custodial fees typically range



from 0.05% to 0.30%. Fees are paid quarterly, in advance, based on the value of the account on the last day of the previous quarter.

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

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

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

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

Epoch provides portfolio management services to affluent and high net worth individuals and corporate pension and profit-sharing plans. The minimum account size for opening accounts is \$50,000, which may be waived. There are circumstances where accounts require higher minimums, such as when Envestnet is used for portfolios comprised of separate account managers.

Epoch also provides pension consulting services to 401(k) plans, retirement plans for non-profit organizations, executive deferred compensation plans and health & welfare plans (VEBA Trust). There is no minimum account size.

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

“Investing in securities involves risk of loss that clients should be prepared to bear.”

The portfolios we build for you have not been approved or disapproved by the Securities and Exchange Commission. Any representation to the contrary is a criminal offense. Investment in securities is neither insured nor guaranteed by the Federal Deposit Insurance Corporation (FDIC) or any other government agency, unless specifically stated otherwise.

Epoch attempts to meet the various risk/return needs of investors by managing portfolios that range from aggressive growth to capital preservation. All investing involves risk. We employ a long-term investment philosophy and we utilize both “active” and “passive” investment strategies in your portfolio unless you request otherwise. We also utilize both “growth” and “value” investment styles in stock portfolios, while investing across the full spectrum of asset classes (e.g., stocks and bonds). We also invest across the full spectrum of investment categories (i.e., US large cap, small/mid cap, foreign securities, government bonds, high-yield bonds, etc.). Portfolios are rebalanced to attempt to produce a more level performance experience for investors. Under normal market conditions, we strive to be fully invested, and we consider the tax ramifications of short-term buying and selling. At all times, we attempt to match the investment vehicles used to fund your portfolio with that of your personal risk profile (e.g., individual stocks versus stock mutual fund).

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

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

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

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

Epoch is not compensated by any other financial institution nor from any other source other than from our clients.

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

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

**Item 11 – Code of Ethics**

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

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

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

A Chief Compliance Officer has been appointed by Epoch to monitor compliance and to recommend revisions to the Code where revisions are viewed as strengthening Epoch's fiduciary responsibilities to its clients. Clients or prospective clients may request a copy of the firm's Code of Ethics by contacting Yvette Clark.

## **Item 12 – Brokerage Practices**

Epoch does not maintain custody of assets that we manage, although we may be deemed to have custody of your assets if you give us authority to withdraw assets from your account (see Item – 15 Custody below). Your assets must be maintained in an account at a "qualified custodian", generally a broker-dealer or bank. We request that our clients use Charles Schwab & Co., Inc. (Schwab), a registered broker-dealer, member SIPC, as the qualified custodian. We are independently owned and operated and are not affiliated with Schwab. Schwab will hold your assets in a brokerage account and buy and sell securities when we instruct them to. While we request that you use Schwab as custodian/broker, you will decide whether to do so and will open your account with Schwab by entering into an account agreement directly with them. We do not open the account for you, although we may assist you in doing so. Not all advisors require their clients to use a particular broker-dealer or other custodian selected by the advisor. Even though your account is maintained at Schwab, we can still use other brokers to execute trades for your account as described below (see "*Your Brokerage and Custody Costs*").

### *How We Select Brokers/Custodians*

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

- Combination of transaction execution services and asset custody services
- Capability to execute, clear, and settle trades (buy and sell securities for your account)
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
- Breadth of available investment products (stocks, bonds, mutual funds, ETFs, etc.)
- Availability of investment research and tools that assist us in making investment decisions
- Quality of services
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices
- Reputation, financial strength, and stability
- Prior service to us and our other clients
- Availability of other products and services that benefit us, as discussed below

### *Your Brokerage and Custody Costs*

For our clients' accounts that Schwab maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes

or that settle into your Schwab account. For some accounts, Schwab may charge you a percentage of the dollar amount of assets in the account in lieu of commissions. Schwab's commission rates applicable to our client accounts were negotiated based on the condition that: (i) our clients collectively maintain a total of at least \$10 million of their assets in accounts at Schwab; and (ii) we trade electronically using the web. This commitment benefits you because the overall commission rates you pay are lower than they would be otherwise. We have a duty to seek "best execution" of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed on the previous page.

#### *Products and Services Available to Us From Schwab*

Schwab Advisor Services is Schwab's business serving independent investment advisory firms like us. They provide us and our clients with access to its institutional brokerage-trading, custody, reporting, and related services – many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer our clients' accounts, while others help us manage and grow our business. Schwab's support services generally are available on an unsolicited basis (we don't have to request them) and at no charge to us as long as our clients collectively maintain a total of at least \$10 million of their assets in accounts at Schwab. If our clients collectively have less than \$10 million in assets at Schwab, Schwab may charge us quarterly service fees of \$1,200. Following is a more detailed description of Schwab's support services:

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

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

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

Services that generally benefit only us include the following:

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

#### *Our Interest in Schwab's Services*

The availability of these services from Schwab benefits us because we do not have to produce or purchase them as long as we collectively keep \$10 million in client assets at Schwab. Beyond that, these services are not contingent upon us committing any specific amount of business to Schwab in trading commission or assets in custody. The \$10 million minimum may give us an incentive to request that you maintain your

account with Schwab, based on our interest in receiving Schwab's services that benefit our business rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a potential conflict of interest. We believe, however, that our selection of Schwab as custodian and broker is in the best interests of our clients. Our selection is primarily supported on the scope, quality, and price of Schwab's services and not Schwab's services that benefit only us.

## **Item 13 – Review of Accounts**

We review all accounts in our private wealth management program at least quarterly. On an annual basis, or more frequently if needed, we meet personally or by telephone to discuss performance and any changes to your financial objectives or risk/return profile. More frequent reviews may be triggered by: (i) important issues affecting the financial markets; (ii) change in client's financial circumstances; and (iii) change in Epoch's opinion relative to a company, mutual fund, industry or sector, or sub-advisor relationship. Each quarter, you will receive quarterly performance reports from Epoch, indicating investment holdings and performance for the period, year-to-date, and since account origination. Separately, clients receive monthly statements directly from the broker-dealer/custodian indicating investment holdings and all transactions for the month. Special reports for clients may be prepared based on the needs of a client and provided more frequently than on a quarterly basis. A "realized gains & loss" report is provided annually for taxable accounts.

All client reviews are conducted by Rick Tasker, the firm's president and founder. Clients may call Epoch any time during normal business hours to discuss their account.

There is no review of statements for pension consulting clients. We provide quarterly investment monitoring reports and we do attend quarterly meetings for certain pension clients. Other pension clients we meet with every six months, and some annually.

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

Epoch has an agreement with 401kLatino and Transparent 401k, two independent companies owned by Marianna Prueger, to provide qualified referrals to Epoch for pension consulting and/or private wealth management services. Neither 401kLatino or Transparent 401k are registered investment advisory firms, and neither are under any common ownership with Epoch. For the referrals, Epoch has agreed to share 50% of its advisory fee with Marianna Prueger for as long as you remain a client of Epoch. In sharing our advisory fee, we have agreed not to increase the advisory fee we normally charge clients for similar services who are not referred by 401kLatino and Transparent 401k. You should be aware, however, that while our fees are negotiable we may be less willing to negotiate with clients who have been referred.

401kLatino and Transparent 401k provide bilingual communication services to clients of Epoch. For clients who have been referred by Marianna Prueger, the cost for bilingual services is covered by the referral fee paid by Epoch to Marianna Prueger.

The fee sharing arrangement with Marianna Prueger is more fully described in the "Customer Acknowledgement Agreement" document for 401kLatino and Transparent 401k that is provided to all referred clients.

Under government regulations, we are deemed to have custody of your assets if, for example, you authorize us to instruct Schwab to deduct our advisory fees directly from your account. Schwab maintains actual custody of your assets. You will receive account statements directly from Schwab at least quarterly. They will be sent to the email or postal mailing address you provided to Schwab. You should carefully review those statements promptly when you receive them. We also urge you to compare Schwab's account statements to the periodic portfolio performance reports you will receive from us.

**Item 16 – Investment Discretion**

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

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

**Item 17 – Voting Client Securities**

As a matter of firm policy and practice, we do not have any authority to and do not vote proxies on behalf of our clients. You retain the responsibility for receiving and voting proxies for any and all securities maintained in your account. We may provide advice to you regarding voting of the proxies.

**Item 18 – Financial Information**

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

**Item 1 – Name of Advisory Representative**

Rick L. Tasker

Epoch Consulting Group  
435 E Street, Suite B  
Santa Rosa, CA 95404

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

Dated: March 31, 2011

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

**Item 2 – Educational Background and Business Experience**

Rick L. Tasker

Year of Birth: 1954

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

President & Founder of Epoch Consulting Group in 2004

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

**Item 3 – Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each person providing investment advice. No information is applicable to this Item.

**Item 4 – Other Business Activities**

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

**Item 5 – Additional Compensation**

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

**Item 6 – Supervision**

The advisor is the sole provider of investment advisory services at the firm.