**EPG Advisory, LLC**

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***This brochure provides information about the qualifications and business practices of EPG Advisory, LLC. If you have any questions about the contents of this brochure, please contact us at (717) 560 – 2813 and / or ksrayepg@comcast.net.***

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

***Additional information about EPG Advisory, LLC also is available on the SEC’s website at www.advisorinfo.sec.gov.***

# Material Changes since last Annual Update

**The last Annual Update to the EPG Advisory, LLC brochure was filed 2/03/2014. The following are material changes since our last update. Material changes to the current filing include:**

* **Increase of assets under management to approximately $41 million**
* **Addition of AE Wealth Management co-Advisory relationship and investment management services**

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## Item 4(A): EPG Advisory, LLC Business

The Principal Owner of EPG Advisory, LLC is EPG Agency LLC, a Delaware Series LLC. EPG Advisory, Series is a separate series LLC of EPG Agency LLC. The Principal Owner and Managing Member of EPG Agency, LLC is Kenneth S Ray.

EPG Agency LLC, a Delaware Series LLC. EPG Advisory, Series was formed October 9, 2009. Registration as an investment advisor became effective January 1, 2010.

## Item 4(B): Advisory Services Offered

EPG Advisory, LLC offers three discretionary account management services and fee based personal financial services offered without implementation of a commission based financial product. Each of the discretionary account management services is considered is considered to utilize “active” management as contrasted to “passive” management. Accounts are held at E-Trade Securities, Fidelity Investments or T D Ameritrade depending on the management service selected. The Global Steward and Special Situations management and financial planning services are considered to be “fee based” management services. Advisor does not receive any compensation from transaction commissions payable by Client to E-Trade Securities. The AE Wealth Management services may be offered on a fee only basis or on a wrap fee basis, the choice to be determined by client.

Clients may terminate the Advisory contract without penalty at any time.

## Global Steward Managed Account

The Global Steward Managed Account service provides discretionary individualized account management tailored to client objectives. There are three levels of management involved with the Global Steward account.

First, General Asset Allocation diversifies portfolios into approximately 7 asset classes including, but not limited to the following:

➢Global currency, gold or equivalent Exchange Traded Funds (hereafter “ETFs”)

➢Commodity related equities and / or ETFs

➢Energy related equities and / or ETFs

➢Service Sector equities and / or ETFs

➢Technology Sector equities and / or ETFs

➢Synthetic Bond ETFs

➢Special Situation equities and / or ETF

Advisor may in his sole discretion overweight or underweight allocations into specific asset classes based on Advisor's perception of market conditions.

Second, Specific Individual Securities are selected on the basis of fundamental analysis and / or (in the case of ETFs) their correlation to underlying assets.

Third, Detailed Option Writing seeks to enhance income and reduce risk by timing the sale of options using short term pattern recognition.

## AE Wealth Management

We have entered into a co-advisory relationship with AE Wealth Management, LLC (“AEWM”) to provide investment advisory services to our clients. This arrangement allows us to access model portfolios, model managers, strategists, third party money managers, and trading services through AEWM’s managed account program. As part of the AEWM program, you will give us and AEWM discretion to select third party, nonaffiliated investment managers (“Model Managers”) to design and manage model portfolios for your assets. If we offer you services through AEWM, we will provide you with a copy of AEWM’s disclosure brochure which contains a detailed description of AEWM’s services.

## Special Situation Managed Account

The Special Situation Managed Account service provides discretionary individualized account management tailored to client objectives. There are three levels of management involved with the Special Situation managed account.

First, General Asset Allocation is determined by Investment Advisor in consultation with

Client to allocate a specific percentage of Client portfolio into the Special Situation Managed Account.

Second, Specific Securities are selected at the discretion of Investment Advisor. Third, Detailed Option Writing may be used seeking to enhance income and reduce risk of owning securities selected by Investment Advisor.

## Item 4(E): Amount of Assets Managed

Advisor currently manages a total of approximately $41 million consisting of approximately $5 million of securities on a fee only discretionary basis and approximately $36 million of "secure", insurance based investments on which no fee is charged, but on which the insurance industry typically pays the Advisor commission compensation.

## Item 5: Fees and Compensation to Advisor

Advisor charges the following fees monthly in arrears for all managed securities accounts. Fees are calculated on the basis of the value of the account at the end of the month. Accounts having assets managed less than the full month are charged based on the pro-rata portion of the month the assets were managed. Fees are deducted directly from the account on or about the first day of each month.

Fees charged for aggregate account values for Global Steward accounts less than $250,000 may exceed 2% annually. Advisor seeks to offset these fees by actively managing accounts by generating monthly income through option writing and by capitalizing on shorter term market price fluctuations; however, there can be no assurance that Advisor will be successful in achieving these objectives. Consequently, Advisor’s fees for Global Steward accounts may be higher than the industry standard for accounts of this size and that alternative services may be available through AE Wealth Management or other Advisors for a lower fee.

### Aggregate Amount Monthly fee $0 - $99,999 .225 % $100,000 - $249,999 .18 % $250,000 - $499,999 .135 % $500,000 - $2,500,000 .10 % Over $2,500,000 neg.%

Client will additionally incur transaction charges, custodial fees or other fees charged by brokerage firm where client account custody is held. EPG Advisory does not receive any remuneration whatsoever from any of these fees. Refer to Item 12 of this brochure for further information describing brokerage practices.

Services provided through AEWM’s managed account program are offered both on a non-wrap fee basis and through a wrap fee program. If client chooses to receive services on a non-wrap fee basis, client may pay separate commissions, ticket charges, and custodian fees for the execution of transactions in your account. These charges (if applicable) will be in addition to any investment management fee that client may pay to AEWM and to our firm. If client chooses to receive services through the wrap fee program, client will only pay fees based on assets under management and client will not pay a separate commission, ticket charge, or custodian fee, for the execution of transactions in client’s account. AEWM and our firm will receive a portion of the fee as compensation for services. When services are provided through AEWM, our firm is allowed to set the investment management fee up to a maximum of 2.9% of assets under management on an annual basis. The annual fee will be specified in client coadvisory agreement with AEWM and our firm. A more detailed description of fees related to AEWM’s managed account program is located in AEWM’s disclosure brochure which will be provided to client if we offer client services through AEWM.

## Item 7: Clients

Advisor provides services to individuals, trusts, pensions, for profit and non – profit organizations. Account minimum for the Global Steward account is $50,000 for each of the managed accounts unless minimum is waived by Advisor. Account minimum for the Special Situations and AE Wealth Management accounts is $10,000 unless minimum is increased by Advisor.

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

## Global Steward Managed Account

Advisor seeks to diversify asset classes into sectors which Advisor believes exemplify a responsible steward. These characteristics include a global perspective, long term sustainable growth in an unstable environment, beneficial to society and with a sensitivity to how anticipated price fluctuation will balance other asset classes during volatile market conditions.

Specific securities are selected on the basis of fundamental investment characteristics including Advisor’s analysis that the security exhibit favorable long-term prospects. Factors include consistency of the company’s operating history, dominance in the marketplace, sustainable profit margins, price relative to other comparable investments or (in the case of ETFs) the security’s correlation to an underlying investment.

Advisor evaluates option writing based on an analysis of short term price fluctuation using pattern recognition as well as calculating possible return scenarios if called.

*There can be no assurance that Advisor will achieve its objectives in managing the Global Steward Managed Account and Client must assume the risk of a loss of capital.*

### AE Wealth Management Managed Account

Clients utilizing management services of AE Wealth management counsel with Advisor to select an appropriate risk level for their personal objectives. Based upon this risk level Advisor recommends a suitable model portfolio strategy, including model portfolio managers, trading platform, ongoing management and review.

*There can be no assurance that Advisor will achieve its objectives in managing the AE Wealth Management Account and Client must assume the risk of a loss of capital.*

## Special Situations Managed Account

Advisor seeks to identify a particular investment opportunity which Advisor believes to have favorable potential for investment return. These “Special Situations” may be either short or long term, may involve high or low risk of loss of capital and are managed entirely at the discretion of the Advisor.

Advisor may utilize option writing based on its analysis of short term price fluctuation using pattern recognition as well as calculating possible return scenarios if called. *There can be no assurance that Advisor will achieve its objectives in managing the Special Situations Managed Account and Client must assume the risk of a loss of capital.*

## Item 9: Disciplinary Information

There have been no disciplinary infractions for anyone associated with EPG Advisory, LLC.

### Item 10: Other Financial Industry Activities and Affiliations

**Kenneth S Ray** is primary owner, and managing member and a licensed agent of EPG Agency, LLC, an independent insurance agency. His investment allocations may include a portion of a client portfolio allocated to "secure" investments provided by the insurance industry and for which he receives commission compensation. Ken has served on the National Association of Business Economists Survey Committee and currently serves on the Capstone Foundation Executive Committee.

**Michael D Novak** is an independent licensed insurance agent. His investment allocations may include a portion of a client portfolio allocated to "secure" investments provided by the insurance industry and for which he receives commission compensation.

Mike is a charter member of Kingdom Advisors, a member of The Stewardship Alliance

(TSA) and serves on the Executive Leadership Council for Capstone Legacy Foundation. Michael also serves as a board member of Water Street Ministries (WSM) and chairs the WSM Development Committee in Lancaster, PA each from which he receives no compensation. He has been instrumental in the development of a local volunteer initiative in ServeLancaster.com.

Mike serves as the managing registered Investment Advisor Representative with Life Stewardship Advisors, a Registered Investment Advisor..

### item 11: Code of Ethics

All officers, directors and employees of EPG Advisory, LLC are subject to a Code of Ethics. A copy of the EPG Advisory, LLC Code of Ethics is available to any Client of prospective Client upon request.

### Participation Interest in Client Transactions

All officers, directors and employees of EPG Advisory, LLC may invest in the same securities as Clients of EPG Advisory, LLC. If any potential conflict of interest occurs, Client transactions will be considered preferential. It is further noted that Applicant is in and shall be in total compliance with The Insider Trading and Securities Fraud Enforcement Act of 1988. Specifically, Applicant has adopted a firm wide policy outlining insider trading compliance by Applicant and associated persons and other employees. this statement has been distributed to all associated persons and employees of Applicant and has been signed and dated by each person. A copy of such firm wide policy is left with each person and the original is maintained in a master file. Further, Applicant has adopted a written supervisory procedures statement highlighting the steps to be taken to implement the firm wide policy. These materials are also distributed to all associated persons and employees of Applicant, are signed and dated and filed with the insider trading compliance materials. There are provisions adopted for (1) restricting access to the files, (2) providing continuing education, (3) restricting and / or monitoring trading on those securities of which Applicant's employees may have non-public information, (4) requiring all of Applicant's employees to conduct all of their trading through a specified broker or reporting all of their trading promptly to Applicant and (5) monitoring the securities trading of the firm and its' employees or associated persons.

### Personal Trading

All officers, directors and employees of EPG Advisory, LLC may invest in the same securities as Clients of EPG Advisory, LLC. When so doing, they shall submit to Kenneth S Ray a report of every securities transaction in which they, their families (including the spouse, minor children and adults living in the same household as the officer, director or employee), and trusts of which they are trustees or in which they have a beneficial interest have participated within ten days after such transaction. The report shall include the name of the security, date of the transaction, quantity, price, and broker/ dealer through which the transaction was effected. The requirement may be satisfied by sending duplicate confirmations of such trade to Kenneth S. Ray.

### Item 12: Brokerage Practices

Advisor recommends E-Trade discount brokerage services based on overall cost and quality of services provided by E-Trade. Considerations include transaction costs, transaction speed of execution, access to 24X7 online account information, customer service, tax reporting of investment account performance, availability of electronic statements and accessibility. Advisor utilizes "block trading" through E-Trade to aggregate Advisor receives no compensation, research services, soft dollar benefits, referrals, products or remuneration whatsoever for its referral of clients to E-Trade.

### Item 13: Review of Client Accounts

Review of actively managed accounts occurs on an ongoing basis. After individualized asset allocations are determined and funds are invested, Advisor manages specific positions on the basis of block transactions; i.e., all Client accounts holding the same type of security purchase and sell the security during the same block transaction.

Following such transactions, positions are allocated on a pro rata basis. In person Client reviews also occur. Frequency may vary between quarterly and annually dependent on Client needs.

**Item 14: Client Referrals and Other Compensation**  No compensation is paid for Client referrals.

### Item 15: Custody

Applicant relies on the three prong safe harbor of 83-46cc (Lawwill, Sena & Weller, Inc. and Investment Counsel Association of America, Inc.) to allow the position that Applicant does not have custody. (1) Client provides a written authorization permitting advisor's fees to be paid directly from the Client's account by an independent custodian or trustee, (2) applicant sends to the client and the custodian or trustee at the same time a bill showing the amount of the fee, the value of the client's assets on which the fee is based and the specific manner in which the advisor's fee was calculated and (3) the custodian or trustee agrees to send to Client a statement no less than quarterly indicating all amounts disbursed from the account including the amount of advisory fees paid directly to the advisor.

Client may terminate an investment advisory contract at any time. Such termination shall be effective immediately upon date of receipt of written notice by EPG Advisory, LLC whereupon the pro rata portion of monthly or quarterly fees shall be removed from the account in accordance with the three prong safe harbor of 83-46cc procedure described above.

### Item 16: Investment Discretion

Advisor requires discretionary management authority to actively manage the Global Steward, and Special Situations accounts.

Advisor manages discretionary accounts according to a non-exclusive safe harbor exemption from the definition of an investment company under section 5 of the Securities Act of 1933 with respect to programs that are organized and operated in the manner described in rule 3a 4.

1. Each client's account in the program is managed on the basis of the client's financial situation and investment objectives and in accordance with any reasonable restrictions imposed by the client on the management of the account.

1. Suitability considerations:

* 1. At the opening of the account, the Advisor obtains information from the client regarding the client's financial situation and investment objectives, and gives the client the opportunity to impose reasonable restrictions on the management of the account;

* 1. At least annually, the Advisor contacts the client to determine whether there have

been any changes in the client's financial situation or investment objectives, and whether the client wishes to impose any reasonable restrictions on the management of the account or reasonably modify existing restrictions:

* 1. At least quarterly, the Advisor notifies the client in writing to contact the Advisor

or such other person if there have been any changes in the client's financial situation or investment objectives, or if the client wishes to impose any reasonable restrictions on the management of the client's account or reasonably modify existing restrictions, and provides the client with a means through which such contact may be made; and

* 1. The sponsor and personnel of the manager of the client's account of the client's

account who are knowledgeable about the account and its management are reasonably available to the client for consultation.

1. Each client has the ability to impose reasonable restrictions on the management of the client's account, including the designation of particular securities or types of securities that should not be purchased for the account, or that should be sold if held in the account; Provided, however, that nothing in this section requires that a client have the ability to require that particular securities or types of securities be purchased for the account.

1. The Advisor provides each client with a statement, at least quarterly, containing a description of all activity in the client's account during the preceding period, including all transactions made on behalf of the account, all contributions and withdrawals made by the client, all fees and expenses charged to the account, and the value of the account at the beginning and end of the period.

1. Each client retains, with respect to all securities and funds in the account, to the same extent as if the client held the securities and funds outside the program, the right to: 8

* + 1. Withdrawal securities or cash;

* + 1. Vote securities, or delegate the authority to vote securities to another person;

* + 1. Be provided in a timely manner with a written confirmation or other notification

of each securities transaction, and all other documents required by law to be provided to security holder; and

* + 1. Proceed directly as a security holder against the issuer of any security in the client's account and not be obligated to join any person involved in the operation of the program, or any other client of the program, as a condition precedent to initiating such proceeding.

**Item 17: Voting Client Securities**

Advisor does not vote any Client securities.

**Item 18: Financial Information – See Attached**

### Item 19: Background of Principal Executive Officers and management

**Kenneth S Ray,** has more than 30 years of experience helping families achieve their financial and estate planning objectives. Ken has served as Vice President, Investments of a national brokerage firm, received a patent and national recognition for developing advanced, artificial intelligence, investment management technologies, managed two mutual funds and authored The New Investment Manager (Amazon.com).

Ken founded Estate Protection Group, LLC, including EPG Agency LLC and EPG

Advisory, LLC in 2004 to provide families with a blend of legal, financial and health care protection resources. He serves as a Stephen Minister and is on the Executive Leadership Council for Capstone Legacy Foundation. His academic training includes a B.A. (Psychology and Business), Lycoming College, 1976 and M.Ed., Temple University, 1986, Santa Fe Institute, Summer Program, 1993 and 1999.

**Michael D. Novak** is an Independent Registered Investment Advisor; dba Life Stewardship Advisors (LSA.)  He has been a Certified Financial Planner since 1994.  His planning services are comprehensive with an expertise in charitable planning techniques.  His planning services through LSA are done on a fee basis. He is also in an Independent Licensed Insurance Agent.  His investment allocations may include a portion of a client portfolio allocated to “secure” investments provided by the insurance industry for which he receives commission compensation.  Michael is a charter member of Kingdom Advisors and serves on the Executive Leadership Council for Capstone Legacy Foundation.  Michael also serves as a board member of Water Street Ministries (WSM) in various capacities in Lancaster, PA, from which he receives no compensation.  He has been instrumental in the development of a local volunteer initiative in ServeLancaster.com.

See Items 9 and 10 of this brochure for Disciplinary Information and Other Industry Activities and Affiliations.