

**EisnerAmper Wealth Management &  
Corporate Benefits, LLC**  
SEC File Number: 801 -69518

**ADV Part 2A, Firm Brochure**  
**Dated: March 15, 2019**

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**This Brochure provides information about the qualifications and business practices of EisnerAmper Wealth Management & Corporate Benefits, LLC (“EisnerAmper Wealth Management”). If you have any questions about the contents of this Brochure, please contact us at (908) 429-0025 or [mscudillo@eawmcb.com](mailto:mscudillo@eawmcb.com). 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.**

**Additional information about EisnerAmper Wealth Management & Corporate Benefits, LLC also is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

**References herein to EisnerAmper Wealth Management & Corporate Benefits, LLC as a “registered investment adviser” or any reference to being “registered” does not imply a certain level of skill or training.**

## **Item 2           Material Changes**

Since EisnerAmper Wealth Management’s last Annual Amendment filing made on March 15, 2018, this Brochure has been amended at Item 10 to disclose insurance referral relationships and corresponding conflicts of interest. Item 10 has also been amended to remove reference to a former referral relationship with an unaffiliated federal savings association. This Brochure has been further amended throughout to remove reference to a former insurance affiliate.

**ANY QUESTIONS: EisnerAmper Wealth Management & Corporate Benefits’ Chief Compliance Officer, Marc Scudillo, remains available to address any questions that an existing or prospective client may have regarding this Brochure**

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## Item 4      **Advisory Business**

A. EisnerAmper Wealth Management is a limited liability company formed on May 12, 1999 in the State of New Jersey. EisnerAmper Wealth Management became registered as an Investment Adviser Firm in August 2008. EisnerAmper Wealth Management is owned by Marc L. Scudillo and EisnerAmper LLP. Mr. Scudillo is EisnerAmper Wealth Management's Managing Member and Chief Compliance Officer.

B.

### **ADVOCACY MANAGEMENT PLANNING & INVESTMENT MANAGEMENT SERVICES**

EisnerAmper Wealth Management provides discretionary investment advisory and advocacy management planning services on *fee* basis. EisnerAmper Wealth Management's annual fee is generally based upon a percentage (%) of the market value of the assets placed under management. Prior to engaging EisnerAmper Wealth Management to provide investment advisory services, clients are required to enter into an Investment Advisory Agreement setting forth the terms and conditions of the engagement (including termination), describing the scope of the services to be provided, and the fee that is due from the client. EisnerAmper Wealth Management shall provide investment management services specific to the needs of each client. Prior to providing investment management services, an investment adviser representative will ascertain each client's investment objective(s). Thereafter, EisnerAmper Wealth Management shall allocate investment assets consistent with the designated investment objective(s).

As part of this combined service offering, EisnerAmper Wealth Management utilizes a suite of digitally powered technology solutions offered by FinLife Partners, a division of United Capital Financial Advisers, LLC ("FinLife Partners"). FinLife Partners provides EisnerAmper Wealth Management with access to a technology platform that includes certain clerical document and data compilation services. FinLife Partners is not in any way involved in, or responsible for, the individual investment management or guidance provided to EisnerAmper Wealth Management's clients. (*See* FinLife Partners Service Offering discussion and conflicts disclosure below)

Clients may also choose to engage EisnerAmper Wealth Management to provide discretionary investment management services on a stand-alone basis. Clients who select investment management services on a stand-alone basis will not receive advocacy management services or the benefit of the tools made available through the FinLife platform.

### **ADVOCACY MANAGEMENT PLANNING ONLY**

EisnerAmper Wealth Management may provide Financial Guidance services (including investment and non-investment related matters, including estate planning, insurance planning, etc.) on a stand-alone separate fee basis. EisnerAmper Wealth Management's Financial Guidance fees range from 0.60% to negotiable, subject to a minimum annual fee of \$4,500 (*See* Items 5 below), depending upon the level and scope of the service(s) required and the professional(s) rendering the service(s). Before engaging EisnerAmper Wealth Management to provide planning or consulting services, clients are generally required to enter into a *Financial Guidance Service Agreement* with EisnerAmper Wealth Management setting forth the terms and conditions of the engagement (including

termination), describing the scope of the services to be provided, and the portion of the fee that is due from the client before EisnerAmper Wealth Management commences services.

EisnerAmper Wealth Management's Financial Guidance services are generally delivered through the Guidebook and utilize a suite of digitally powered technology solutions offered by FinLife Partners. FinLife Partners provides EisnerAmper Wealth Management with access to a technology platform that includes certain clerical document and data compilation services. FinLife Partners is not in any way involved in, or responsible for, the individual investment management or guidance provided to EisnerAmper Wealth Management's clients.

### **FINANCIAL PLANNING AND CONSULTING SERVICES (STAND-ALONE)**

EisnerAmper Wealth Management may provide financial planning and/or consulting services (including investment and non-investment related matters, including estate planning, insurance planning, etc.) on a stand-alone separate fee basis. Prior to engaging EisnerAmper Wealth Management to provide planning or consulting services, clients are generally required to enter into a *Financial Planning and Consulting Agreement* with EisnerAmper Wealth Management setting forth the terms and conditions of the engagement (including termination), describing the scope of the services to be provided, and the portion of the fee that is due from the client prior to EisnerAmper Wealth Management commencing services. If requested by the client, EisnerAmper Wealth Management may recommend the services of other professionals for implementation purposes, including EisnerAmper Wealth Management's representatives in their individual capacities as registered representatives of Aurora Private Wealth ("Aurora") and/or as licensed insurance agents. (*See* disclosures at Item 10.C). The client is under no obligation to engage the services of any such recommended professional. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation from EisnerAmper Wealth Management.

If the client engages any such recommended professional, and a dispute arises thereafter relative to such engagement, the client agrees to seek recourse exclusively from and against the engaged professional. At all times, the engaged licensed professional[s] (i.e. attorney, accountant, insurance agent, etc.), and not EisnerAmper Wealth Management, shall be responsible for the quality and competency of the services provided.

Each client is advised that it remains the client's responsibility to promptly notify EisnerAmper Wealth Management if there is ever any change in client's financial situation or investment objectives for the purpose of reviewing, evaluating or revising EisnerAmper Wealth Management's previous recommendations and/or services.

### **United Capital Financial Advisers, LLC - Sub-Advisory Relationship**

For certain client assets, EisnerAmper Wealth Management may outsource a portion of its investment management responsibilities to United Capital Financial Advisers, LLC ("UC"), an unaffiliated investment adviser, who serves as a sub-adviser. UC is granted limited discretionary investment authority over assets that EisnerAmper Wealth Management directs to UC. For the assets directed to UC for services, its responsibility includes the authority to:

- exercise discretion to determine the types of securities bought and sold, along with the percentage allocation

- apply its discretion as to when to buy and sell
- apply its discretion as to the timing of transactions
- select the broker-dealer for execution of securities transactions, if appropriate, and
- take other portfolio management actions EisnerAmper Wealth Management delegates or deems appropriate

*UC* sub-advisory authority applies only to the specific assets within the client's custodial account, for which *UC* has been appointed as the sub-adviser. *UC* shall not provide investment advice, or have any advisory responsibility to the client, beyond the assets for which it is appointed as sub-adviser. The terms of services provided by *UC* are directed in accordance with a separate written agreement entered into between EisnerAmper Wealth Management and *UC*. *UC* also provides separate services to EisnerAmper Wealth Management under its division FinLife Partners, as described below.

#### **FinLife Partners Service Offering**

EisnerAmper Wealth Management utilizes a suite of digitally powered technology solutions offered by FinLife Partners, a division of United Capital Financial Advisers, LLC ("FinLife Partners"). FinLife Partners provides EisnerAmper Wealth Management with access to a technology platform that includes certain clerical document and data compilation services. FinLife Partners is not in any way involved in, or responsible for, the individual investment management or guidance provided to EisnerAmper Wealth Management's clients. EisnerAmper Wealth Management pays FinLife Partners a flat fee for its technology implementation services and fees calculated per percentage-basis formula in accordance with the volume of clients for whom EisnerAmper Wealth Management utilizes such services and/or products. As the percentage-basis reduces as volume increases, EisnerAmper Wealth Management is financially incentivized to refer clients to *UC*, thereby creating a conflict of interest.

**No client is under any obligation to utilize *UC*'s sub-advisory services or FinLife Partners' technology solutions.** If a client does not want to utilize *UC* for sub-advisory services or receive EisnerAmper Wealth Management's Financial Guidance Services that require access to the FinLife platform, the client may discuss alternative options with EisnerAmper Wealth Management.

### **RETIREMENT PLAN SERVICES**

EisnerAmper Wealth Management also provides retirement plan consulting/management services, pursuant to which it assists sponsors of self-directed retirement plans organized under the Employee Retirement Security Act of 1974 ("ERISA"). The terms and conditions of the engagement shall be set forth in the agreement between EisnerAmper Wealth Management and the plan sponsor.

To the extent a plan sponsor has engaged EisnerAmper Wealth Management in an ERISA Section 3(21) capacity, EisnerAmper Wealth Management shall assist with the selection and/or monitoring of investment options (generally open-end mutual funds and exchange traded funds) from which plan participants shall choose in self-directing the investments for their individual plan retirement accounts.

## MISCELLANEOUS

**Limitations of Financial Planning and Non-Investment Consulting/Implementation Services.** As indicated above, to the extent requested by a client, EisnerAmper Wealth Management may provide financial planning and related consulting services regarding non-investment related matters, such as estate planning, tax planning, insurance planning, etc. **Please Note:** We **do not** serve as an attorney or accountant, and no portion of our services should be construed as legal or accounting services. Accordingly, we **do not** prepare estate planning documents or tax returns. To the extent requested by a client, we may recommend the services of other professionals for certain non-investment implementation purposes (i.e. attorneys, accountants, insurance, etc.), including representatives of EisnerAmper Wealth Management in their separate individual capacities as representatives of *Aurora*, a FINRA member broker-dealer and as licensed insurance agents. The client is under no obligation to engage the services of any such recommended professional. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation from EisnerAmper Wealth Management and/or its representatives. **Please Note:** If the client engages any recommended unaffiliated professional, and a dispute arises thereafter relative to such engagement, the client agrees to seek recourse exclusively from and against the engaged professional. At all times, the engaged licensed professional[s] (i.e. attorney, accountant, insurance agent, etc.), and **not** EisnerAmper Wealth Management, shall be responsible for the quality and competency of the services provided.

**Conflict of Interest:** The recommendation by EisnerAmper Wealth Management's representative that a client purchase a securities or insurance commission product through EisnerAmper Wealth Management's representative in their separate and individual capacity as a registered representative of *Aurora* and/or as an insurance agent, presents a conflict of interest, as the receipt of commissions may provide an incentive to recommend investment or insurance products based on commissions to be received, rather than on a particular client's need. No client is under any obligation to purchase any securities or insurance commission products through such a representative. Clients are reminded that they may purchase securities and insurance products recommended by EisnerAmper Wealth Management through other, non-affiliated broker-dealers and/or insurance agencies. **EisnerAmper Wealth Management's Chief Compliance Officer, Marc Scudillo remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

**Schwab's Product Offering used by EisnerAmper Wealth Management:** EisnerAmper Wealth Management uses Schwab for passive investment management. Schwab provides access to third party money managers ("TPMMs") who provide taxable and non-taxable exchange traded fund model portfolios. Generally, once a quarter, EisnerAmper Wealth Management shall give instructions to Schwab to rebalance. The system will generate the buy/sell instructions that become part of the trade report on a daily basis.

**SEI's Product Offering used by EisnerAmper Wealth Management:** The Managed Account Program ("MAP") offers access to TPMMs who provide specific investment styles and/or asset classes. Brokerage fees are absorbed by the program and clients will get an account statement from each TPMM.

The Integrated Managed Accounts Program ("IMAP") is a subset of MAP wherein TPMMs provide asset management services, but trades are directed to a custodial account

established in the clients' name. Parametric Portfolio Associates coordinates the securities transactions instructed by the separate TPMMs for SEI. Clients will get one integrated account statement. EisnerAmper Wealth Management can recommend that clients add a tax sensitivity 'sleeve' to the program such that securities trades are evaluated for tax consequences prior to execution.

The Model Mutual Fund Strategies provide access to SEI's non-loaded mutual funds which have stated investment objectives and asset classes. EisnerAmper Wealth Management may choose, on behalf of its clients, among SEI's mutual funds on a discretionary basis.

**Independent Managers.** EisnerAmper Wealth Management may allocate (and/or recommend that the client allocate) a portion of a client's investment assets among unaffiliated independent investment managers in accordance with the client's designated investment objective(s). In such situations, the *Independent Manager[s]* shall have day-to-day responsibility for the active discretionary management of the allocated assets. EisnerAmper Wealth Management shall continue to render investment supervisory services to the client relative to the ongoing monitoring and review of account performance, asset allocation and client investment objectives. Factors which EisnerAmper Wealth Management shall consider in recommending *Independent Manager[s]* include the client's designated investment objective(s), management style, performance, reputation, financial strength, reporting, pricing, and research. The investment management fee charged by the Independent Manager(s) is separate form, and in addition to, EisnerAmper Wealth Management's advisory fee as set forth in Item 5.

**Financial Planning Technology Platforms.** In conjunction with the services provided by various financial planning technology platforms, EisnerAmper Wealth Management may also provide access to account aggregation services, which can incorporate all of the client's investment assets," including those investment assets that are not part of the assets that we manage (the "Excluded Assets"). The client and/or their other advisors that maintain trading authority, and not EisnerAmper Wealth Management, shall be exclusively responsible for the investment performance of the Excluded Assets. EisnerAmper Wealth Management does not provide investment management, monitoring or implementation services for the Excluded Assets. If EisnerAmper Wealth Management is asked to make a recommendation as to any Excluded Assets, the client is under absolutely no obligation to accept the recommendation, and EisnerAmper Wealth Management shall not be responsible for any implementation error (timing, trading, etc.) relative to the Excluded Assets. The client may engage EisnerAmper Wealth Management to provide investment management services for the Excluded Assets pursuant to the terms and conditions of the *Investment Advisory Agreement* between EisnerAmper Wealth Management and the client.

**Unaffiliated Private Investment Funds.** EisnerAmper Wealth Management may provide investment advice regarding unaffiliated private investment funds. EisnerAmper Wealth Management's role relative to the private investment funds shall be limited to its initial and ongoing due diligence and investment monitoring services. If a client determines to become a private fund investor, the amount of assets invested in the fund(s) shall be included as part of "assets under management" for purposes of EisnerAmper Wealth Management calculating its investment advisory fee. EisnerAmper Wealth Management's clients are under absolutely no obligation to consider or make an investment in a private investment fund(s).

Private investment funds generally involve various risk factors, including, but not limited to, potential for complete loss of principal, liquidity constraints and lack of transparency, a complete discussion of which is set forth in each fund's offering documents, which will be provided to each client for review and consideration. Unlike liquid investments that a client may maintain, private investment funds do not provide daily liquidity or pricing. Each prospective client investor will be required to complete a Subscription Agreement, pursuant to which the client shall establish that he/she is qualified for investment in the fund, and acknowledges and accepts the various risk factors that are associated with such an investment.

Please Also Note: Valuation. In the event EisnerAmper Wealth Management references private investment funds owned by the client on any supplemental account reports prepared by EisnerAmper Wealth Management, the value(s) for all private investment funds owned by the client shall reflect the most recent valuation provided by the fund sponsor. The current value of any private investment fund could be significantly more or less than the original purchase price or the price reflected in any supplemental account report.

**Financial Planning Fee Offset.** In the event that any financial planning client determines to engage EisnerAmper Wealth Management or its affiliates for investment or insurance implementation purposes, EisnerAmper Wealth Management may (but is not obligated to in any manner) offset a portion of the financial planning and/or consulting fee against future implementation fees earned by: (1) EisnerAmper Wealth Management from investment management services; or (2) its affiliates on a commission basis (securities via *Aurora*, as disclosed in this Brochure). Please Note: No financial planning client is under any obligation to engage EisnerAmper Wealth Management and/or its affiliated entities or persons for implementation purposes.

**Retirement Rollovers- Conflict of Interest:** A client or prospective client leaving an employer typically has four options regarding an existing retirement plan (and may engage in a combination of these options): (i) leave the money in the former employer's plan, if permitted, (ii) roll over the assets to the new employer's plan, if one is available and rollovers are permitted, (iii) roll over to an Individual Retirement Account ("IRA"), or (iv) cash out the account value (which could, depending upon the client's age, result in adverse tax consequences). If EisnerAmper Wealth Management recommends that a client roll over their retirement plan assets into an account to be managed by EisnerAmper Wealth Management, such a recommendation creates a conflict of interest if EisnerAmper Wealth Management will earn new (or increase its current) compensation as a result of the rollover. **No client is under any obligation to roll over retirement plan assets to an account managed by EisnerAmper Wealth Management. EisnerAmper Wealth Management's Chief Compliance Officer, Marc Scudillo, remains available to address any questions that a client or prospective client may have regarding the conflict of interest presented by such rollover recommendation.**

**Use of Mutual and Exchange Traded Funds.** Most mutual funds and exchange traded funds are available directly to the public. Thus, a prospective client can obtain many of the funds that may be utilized by EisnerAmper Wealth Management independent of engaging EisnerAmper Wealth Management as an investment advisor. However, if a prospective client determines to do so, he/she will not receive EisnerAmper Wealth Management's initial and ongoing investment advisory services. **Please Note:** In addition to EisnerAmper Wealth Management's investment advisory fee described below, and transaction and/or custodial fees discussed below, clients will also incur, relative to all mutual fund and

exchange traded fund purchases, charges imposed at the fund level (e.g. management fees and other fund expenses).

**Structured Notes.** EisnerAmper Wealth Management may purchase structured notes for client accounts. A structured note is a financial instrument that combines two elements, a debt security and exposure to an underlying asset or assets. It is essentially a note, carrying counter party risk of the issuer. However, the return on the note is linked to the return of an underlying asset or assets (such as the S&P 500 Index or commodities). It is this latter feature that makes structured products unique, as the payout can be used to provide some degree of principal protection, leveraged returns (but usually with some cap on the maximum return), and be tailored to a specific market or economic view. In addition, investors may receive long-term capital gains tax treatment if certain underlying conditions are met and the note is held for more than one year. Finally, structured notes may also have liquidity constraints, such that the sale thereof before maturity may be limited.

**Portfolio Activity.** EisnerAmper Wealth Management has a fiduciary duty to provide services consistent with the client's best interest. As part of its investment advisory services, EisnerAmper Wealth Management will review client portfolios on an ongoing basis to determine if any changes are necessary based upon various factors, including, but not limited to, investment performance, fund manager tenure, style drift, account additions/withdrawals, and/or a change in the client's investment objective. Based upon these factors, there may be extended periods of time when EisnerAmper Wealth Management determines that changes to a client's portfolio are neither necessary nor prudent. Of course, as indicated below, there can be no assurance that investment decisions made by EisnerAmper Wealth Management will be profitable or equal any specific performance level(s).

**Client Obligations.** In performing its services, EisnerAmper Wealth Management shall not be required to verify any information received from the client or from the client's other professionals, and is expressly authorized to rely thereon. Moreover, each client is advised that it remains their responsibility to promptly notify EisnerAmper Wealth Management if there is ever any change in their financial situation or investment objectives for the purpose of reviewing, evaluating or revising EisnerAmper Wealth Management's previous recommendations and/or services.

**Disclosure Statement.** A copy of EisnerAmper Wealth Management's written Brochure as set forth on Part 2A of Form ADV shall be provided to each client prior to, or contemporaneously with, the execution of the *Investment Advisory Agreement*, *Financial Planning and Consulting Agreement* or a *Retirement Plan Services Agreement*.

- C. EisnerAmper Wealth Management shall provide investment advisory services specific to the needs of each client. Prior to providing investment advisory services, an investment adviser representative will ascertain each client's investment objective(s). Thereafter, EisnerAmper Wealth Management shall allocate and/or recommend that the client allocate investment assets consistent with the designated investment objective(s). The client may, at any time, impose reasonable restrictions, in writing, on EisnerAmper Wealth Management's services.
- D. EisnerAmper Wealth Management does not offer a wrap fee program for its investment advisory services. However, EisnerAmper Wealth Management is a participating investment adviser in certain unaffiliated wrap account fee programs. The programs for

which EisnerAmper Wealth Management manages investment advisory accounts on a discretionary basis are sponsored by UC and SEI Investments (“SEI”). With respect to the wrap-fee programs in which EisnerAmper Wealth Management is a participating investment adviser, clients pay their fees directly to the wrap fee sponsor/manager, who in turn remits a portion of that fee to EisnerAmper Wealth Management.

- E. As of December 31, 2018, EisnerAmper Wealth Management had \$460,532,086 in assets under management on a discretionary basis and \$41,964,704 in assets under management on a non-discretionary basis.

## Item 5 Fees and Compensation

A.

### ADVOCACY MANAGEMENT PLANNING & INVESTMENT MANAGEMENT SERVICES

EisnerAmper Wealth Management provides discretionary investment advisory services on *fee* basis. EisnerAmper Wealth Management’s annual investment advisory fee shall be based upon a percentage (%) of the market value of the assets placed under EisnerAmper Wealth Management’s management (between 1.45% and negotiable) as follows:

<b>Advocacy Management Plan &amp; Investment Management Fee Schedule</b>			
<b>Client Assets Under Management</b>	<b>Advocacy Management Planning Fee (AUA*)</b>	<b>Investment Management (based on AUM) Fee When Combined with Advocacy Management Planning Fee</b>	<b>Facilitator Clients Investment Management</b>
\$0 - \$1,000,000	\$ 4,500	1.20%	1.50%
\$1,000,001 - \$2,500,000	\$ 5,500	0.90%	1.10%
\$2,500,001 - \$5,000,000	\$ 10,000	0.75%	0.90%
\$5,000,001 - \$10,000,000	\$ 15,000	0.60%	0.75%
\$10,000,001 & Up	Negotiable	Negotiable	Negotiable

\*AUA is “Assets Under Advisement” and the value of AUA is typically determined by the value of assets stated on the client’s balance sheet

The following information applies to the above Cost of Services Schedule:

1. The actual fee paid by each client is noted in an agreement executed between EisnerAmper Wealth Management and the client. As directed in the agreement, the costs agreed to may be higher or lower than the rates noted in the above schedule.
2. The client's total fee is a blended cost.
3. The fee noted for Advocacy Management Planning provides a general guideline used by EisnerAmper Wealth Management as flat rate determined by the value of the client's assets for which EisnerAmper Wealth Management provides Advocacy Management Planning. The client's assets may include their entire net worth, or a portion. The fee is negotiated individually with each client and therefore the actual flat rate charged may

be higher than the amount noted in the schedule applied directly against the client's under management. This is not meant to represent the maximum rate a client may be assessed for Advocacy Management Planning services, instead is it the typical starting rate from which EisnerAmper Wealth Management's fee is negotiated.

4. EisnerAmper Wealth Management imposes minimum costs as follows: Investment Management Only - \$2,000; Advocacy Management Planning only - \$4,500; Combined Discretionary Investment Management & Advocacy Management Planning - \$6,500. Minimum costs may be reduced or waived on a case-by-case basis depending on the facts and circumstances of the services provided, at EisnerAmper Wealth Management's sole determination.
5. Alternatively, EisnerAmper Wealth Management may also provide investment advisory services on an annual flat fee basis. The annual flat fee is negotiable but shall be based upon the client's unique financial facts and circumstances, the complexity of the engagement and the level and scope of the overall investment and financial planning services to be rendered. Generally, EisnerAmper Wealth Management's annual fixed fee will range between \$10,000 and \$50,000.

**Note:** EisnerAmper Wealth Management's fees are negotiable at its discretion, depending upon objective and subjective factors including but not limited to: the amount of assets to be managed; portfolio composition; the scope and complexity of the engagement; the anticipated number of meetings and servicing needs; related accounts; future earning capacity; anticipated future additional assets; the professional(s) rendering the service(s); prior relationships with EisnerAmper Wealth Management and/or its representatives, and negotiations with the client. As a result of these factors, similarly situated clients could pay different fees, the services to be provided by EisnerAmper Wealth Management to any particular client could be available from other advisers at lower fees, and certain clients may have fees different than those specifically set forth above.

#### **Sub-Manager Costs**

When EisnerAmper Wealth Management refers client assets to a Sub-Manager, the client is assessed an additional cost. The Sub-Manger assesses a fee to EisnerAmper Wealth Management for their management services and that fee is passed through directly to the client. The fee is based on a percent of the client's assets and ranges from 0.15% to 0.75%, depending on the manger and services provided. Sub-Managers also impose minimum investment requirements. The minimum amounts vary. In addition to Sub-Manager costs, the investment vehicles that client assets are invested in may have their own associated cost. For instance, costs are charged to shareholders of mutual funds and exchange traded funds by the fund manager and deducted directly from the net asset value of the investment vehicle.

### **RETIREMENT PLAN SERVICES**

The terms and conditions of EisnerAmper Wealth Management's retirement plan services shall generally be set forth in a *Retirement Plan Services Agreement* between EisnerAmper Wealth Management and the plan sponsor. EisnerAmper Wealth Management's negotiable retirement plan consulting fees generally range between 0.25% and 0.75% of the value of plan assets under advisement, depending upon the level and scope of the service(s) required and the professional(s) rendering the service(s).

## FINANCIAL PLANNING AND CONSULTING SERVICES FEES (STAND-ALONE)

EisnerAmper Wealth Management may determine to provide financial planning and/or consulting services (including investment and non-investment related matters, including estate planning, insurance planning, etc.) on a stand-alone fee basis. EisnerAmper Wealth Management's planning and consulting fees are negotiable, but generally range from \$4,500 and up on a fixed fee basis, and from \$100 to \$550 on an hourly rate basis, depending upon the level and scope of the service(s) required and the professional(s) rendering the service(s).

- B. Clients may elect to have EisnerAmper Wealth Management's advisory fees deducted from their custodial account. Both EisnerAmper Wealth Management's *Investment Advisory Agreement* and the custodial/clearing agreement may authorize the custodian to debit the account for the amount of EisnerAmper Wealth Management's investment advisory fee and to directly remit that management fee to EisnerAmper Wealth Management in compliance with regulatory procedures. In the limited event that EisnerAmper Wealth Management bills the client directly, payment is due upon receipt of EisnerAmper Wealth Management's invoice. EisnerAmper Wealth Management shall deduct fees and/or bill clients quarterly in arrears, based upon the market value of the assets on the last business day of the previous quarter.
- C. As discussed below, unless the client directs otherwise or an individual client's circumstances require, EisnerAmper Wealth Management shall generally recommend that *Schwab* and/or *SEI* serve as the broker-dealer/custodian for client investment management assets. Broker-dealers such as *Schwab* and/or *SEI* charge brokerage commissions and/or transaction fees for effecting certain securities transactions (i.e. transaction fees are charged for certain no-load mutual funds, commissions are charged for individual equity and fixed income securities transactions). With the exception of those clients participating in *SEI*'s Managed Account Solutions wrap program, clients will incur, in addition to EisnerAmper Wealth Management's investment management fee, brokerage commissions and/or transaction fees. All clients will also incur, relative to all mutual fund and exchange traded fund purchases, charges imposed at the fund level (e.g. management fees and other fund expenses).
- D. EisnerAmper Wealth Management's annual investment advisory fee shall be prorated and paid quarterly, in arrears, based upon the market value of the assets on the last business day of the previous quarter.

The *Investment Advisory Agreement* between EisnerAmper Wealth Management and the client will continue in effect until terminated by either party by written notice in accordance with the terms of the *Investment Advisory Agreement*. Upon termination, EisnerAmper Wealth Management shall debit the account for the pro-rated portion of the unpaid advanced advisory fee based upon the number of days that services were provided during the billing quarter.

- E. **Commission Transactions.** In the event that the client desires, the client can engage certain of EisnerAmper Wealth Management's representatives, in their individual capacities as registered representatives of *Aurora*, an SEC registered and FINRA member broker-dealer, to implement investment recommendations on a commission basis. In the event the client chooses to purchase investment products through *Aurora*, *Aurora* will charge brokerage commissions to effect securities transactions, a portion of which

commissions *Aurora* shall pay to EisnerAmper Wealth Management's representatives, as applicable. The brokerage commissions charged by *Aurora* may be higher or lower than those charged by other broker-dealers. In addition, *Aurora*, relative to commission mutual fund purchases, may also receive additional ongoing 12b-1 trailing commission compensation directly from the mutual fund company during the period that the client maintains the mutual fund investment.

1. **Conflict of Interest:** The recommendation that a client purchase a commission product from *Aurora* presents a conflict of interest, as the receipt of commissions may provide an incentive to recommend investment products based on commissions to be received, rather than on a particular client's needs. No client is under any obligation to purchase any commission products from *Aurora*. EisnerAmper Wealth Management's Chief Compliance Officer, Marc L. Scudillo, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.
2. **Please Note:** Clients may purchase investment products recommended by EisnerAmper Wealth Management through other non-affiliated broker dealers or agents.
3. EisnerAmper Wealth Management does not receive more than 50% of its revenue from advisory clients as a result of commissions or other compensation for the sale of investment products EisnerAmper Wealth Management recommends to its clients.
4. When EisnerAmper Wealth Management's representatives sell an investment product on a commission basis, EisnerAmper Wealth Management does not charge an advisory fee in addition to the commissions paid by the client for such product. When providing services on an advisory fee basis, EisnerAmper Wealth Management's representatives do not also receive commission compensation for such advisory services. However, a client may engage EisnerAmper Wealth Management to provide investment management services on an advisory fee basis and separate from such advisory services purchase an investment product from EisnerAmper Wealth Management's representatives on a separate commission basis.

## **Item 6      Performance-Based Fees and Side-by-Side Management**

Neither EisnerAmper Wealth Management, nor any supervised person of EisnerAmper Wealth Management, accepts performance-based fees.

## **Item 7      Types of Clients**

EisnerAmper Wealth Management's clients shall generally include individuals, pension and profit sharing plans, business entities, trusts, estates, and charitable organizations.

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

- A. EisnerAmper Wealth Management may utilize the following methods of security analysis:
- Charting - (analysis performed using patterns to identify current trends and trend reversals to forecast the direction of prices)
  - Fundamental - (analysis performed on historical and present data, with the goal of making financial forecasts)
  - Technical – (analysis performed on historical and present data, focusing on price and trade volume, to forecast the direction of prices)
  - Cyclical – (analysis performed on historical relationships between price and market trends, to forecast the direction of prices)

EisnerAmper Wealth Management may utilize the following investment strategies when implementing investment advice given to clients:

- Long Term Purchases (securities held at least a year)
- Short Term Purchases (securities sold within a year)
- Trading (securities sold within thirty (30) days)

**Please Note: Investment Risk.** Investing in securities involves risk of loss that clients should be prepared to bear. Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy (including the investments and/or investment strategies recommended or undertaken by EisnerAmper Wealth Management) will be profitable or equal any specific performance level(s).

- B. EisnerAmper Wealth Management’s methods of analysis and investment strategies do not present any significant or unusual risks.

However, every method of analysis has its own inherent risks. To perform an accurate market analysis EisnerAmper Wealth Management must have access to current/new market information. EisnerAmper Wealth Management has no control over the dissemination rate of market information; therefore, unbeknownst to EisnerAmper Wealth Management, certain analyses may be compiled with outdated market information, severely limiting the value of EisnerAmper Wealth Management’s analysis. Furthermore, an accurate market analysis can only produce a forecast of the direction of market values. There can be no assurances that a forecasted change in market value will materialize into actionable and/or profitable investment opportunities.

EisnerAmper Wealth Management’s primary investment strategies - Long Term Purchases, Short Term Purchases, and Trading - are fundamental investment strategies. However, every investment strategy has its own inherent risks and limitations. For example, longer term investment strategies require a longer investment time period to allow for the strategy to potentially develop. Shorter term investment strategies require a shorter investment time period to potentially develop but, as a result of more frequent trading, may incur higher transactional costs when compared to a longer term investment strategy. Trading, an investment strategy that requires the purchase and sale of securities within a thirty (30) day investment time period, involves a very short investment time period but will incur higher transaction costs when compared to a short term investment strategy and substantially higher transaction costs than a longer term investment strategy.

- C. Currently, EisnerAmper Wealth Management primarily allocates client investment assets, on a discretionary and/or non-discretionary basis, among various mutual funds and/or exchange traded funds (“ETFs”) and *Independent Manager(s)*, in accordance with the client’s designated investment objective(s). (See *Independent Manager(s)* above).

## **Item 9           Disciplinary Information**

EisnerAmper Wealth Management has not been the subject of any disciplinary actions that are material to a client or prospective client’s evaluation of its advisory business.

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

- A. **Registered Representative of Aurora.** As disclosed above in Item 5.E, certain of EisnerAmper Wealth Management’s representatives are also registered representatives of *Aurora*, an SEC Registered and FINRA member broker-dealer.
- B. Neither EisnerAmper Wealth Management, nor its representatives, are registered or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or a representative of the foregoing.
- C. **Registered Representatives of Aurora.** As disclosed above in Item 5.E, certain of EisnerAmper Wealth Management’s representatives, are registered representatives of *Aurora*, an SEC Registered and FINRA member broker-dealer. Clients may choose to engage, certain of EisnerAmper Wealth Management’s representatives in their individual capacities as registered representatives of *Aurora*, to implement investment recommendations on a commission basis.

**Conflict of Interest:** The recommendation by certain of EisnerAmper Wealth Management’s representatives that a client purchase a securities commission product presents a conflict of interest, as the receipt of commissions may provide an incentive to recommend investment products based on commissions to be received, rather than on a particular client’s need. No client is under any obligation to purchase any commission products from these representatives. Clients are reminded that they may purchase securities products recommended by EisnerAmper Wealth Management through other, non-affiliated registered representatives of a broker-dealer. EisnerAmper Wealth Management’s Chief Compliance Officer, Marc L. Scudillo, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.

**Other Investment Adviser Firms.** EisnerAmper Wealth Management’s affiliated accounting firm, EisnerAmper LLP (“EA”), is the indirect owner of EisnerAmper Wealth Advisors LLC (“EAWA”) and a fifty percent (50%) owner of TAG Eisner LLC (“TAG”), each an SEC registered investment adviser firm. Although it is generally not EisnerAmper Wealth Management’s practice to do so, EisnerAmper Wealth Management may refer certain clients to EAWA and/or TAG for advisory services. No client is under any obligation to engage the services of either EAWA or TAG and clients are reminded that comparable advisory services may be available from other non-affiliated investment advisory firms at a lesser expense. EisnerAmper Wealth Management’s Chief Compliance Officer, Marc L. Scudillo, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.

**Affiliated Accounting Firm.** EisnerAmper Wealth Management does not render accounting advice or tax preparation services to its clients. Rather, to the extent that a client requires accounting advice and/or tax preparation services, EisnerAmper Wealth Management, if requested, may recommend the services of a Certified Public Accountant, all of which services shall be rendered independent of EisnerAmper Wealth Management pursuant to a separate agreement between the client and the Certified Public Accountant. EisnerAmper Wealth Management shall not receive any of the fees charged by any recommended Certified Public Accountant, referral or otherwise.

EisnerAmper LLP (“EA”), a Certified Public Accounting firm with whom EisnerAmper Wealth Management shares office space and administrative personnel, is the fifty percent (50%) owner of EisnerAmper Wealth Management. EA provides accounting and/or tax preparation services, including to clients of EisnerAmper Wealth Management. To the extent that EA provides accounting and/or tax preparation services to any clients, including clients of EisnerAmper Wealth Management, all such services shall be performed by EA, independent of EisnerAmper Wealth Management, for which services EisnerAmper Wealth Management shall not receive any portion of the fees charged by EA, referral or otherwise.

It is expected that members of EA, solely incidental to their respective practices as Certified Public Accountants, may recommend EisnerAmper Wealth Management’s services to certain of EA’s clients. Neither EA, nor any of its members, shall receive referral fees from EisnerAmper Wealth Management. However, members of EA shall be entitled to receive distributions relative to their respective ownership interests in EisnerAmper Wealth Management. Neither EA, nor any of its members, are currently involved in providing investment advice on behalf of EisnerAmper Wealth Management, nor does EA, hold itself out as providing advisory services on its own behalf or on behalf of EisnerAmper Wealth Management.

**Licensed Insurance Agents.** Certain of EisnerAmper Wealth Management’s representatives, in their individual capacities, serve as licensed insurance agents with various insurance companies, and may, in such individual capacities, recommend the purchase of certain insurance-related products on a commission basis to EisnerAmper Wealth Management’s advisory clients. Referrals for insurance-related products may also be made to various unaffiliated third party insurance agents/agencies.

**Conflict of Interest:** The recommendation by EisnerAmper Wealth Management or EisnerAmper Wealth Management’s representatives that a client utilize outside insurance agents/agencies and/or EisnerAmper Wealth Management’s representatives in their capacities as licensed insurance agents for insurance-related services presents a conflict of interest, as the receipt of referral revenue and/or commissions may provide an incentive to recommend insurance products/agents/agencies based on referral revenue and/or commissions to be received, rather than on a particular client’s need. No client is under any obligation to purchase any commission products from, or otherwise utilize the services of, any insurance agents/agencies and/or EisnerAmper Wealth Management’s representatives. Clients are reminded that they may purchase insurance products recommended by EisnerAmper Wealth Management through other non-affiliated insurance agencies/agents. EisnerAmper Wealth Management’s Chief Compliance Officer, Marc L. Scudillo, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.

- D. EisnerAmper Wealth Management does not receive, directly or indirectly, compensation from investment advisors that it recommends or selects for its clients.

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

- A. EisnerAmper Wealth Management maintains an investment policy relative to personal securities transactions. This investment policy is part of EisnerAmper Wealth Management's overall Code of Ethics, which serves to establish a standard of business conduct for all of EisnerAmper Wealth Management's Representatives that is based upon fundamental principles of openness, integrity, honesty and trust, a copy of which is available upon request.

In accordance with Section 204A of the Investment Advisers Act of 1940, EisnerAmper Wealth Management also maintains and enforces written policies reasonably designed to prevent the misuse of material non-public information by EisnerAmper Wealth Management or any person associated with EisnerAmper Wealth Management.

- B. Neither EisnerAmper Wealth Management nor any related person of EisnerAmper Wealth Management recommends, buys, or sells for client accounts, securities in which EisnerAmper Wealth Management or any related person of EisnerAmper Wealth Management has a material financial interest.
- C. EisnerAmper Wealth Management and/or representatives of EisnerAmper Wealth Management *may* buy or sell securities that are also recommended to clients. This practice may create a situation where EisnerAmper Wealth Management and/or representatives of the firm are in a position to materially benefit from the sale or purchase of those securities. Therefore, this situation creates a conflict of interest. Practices such as "scalping" (i.e., a practice whereby the owner of shares of a security recommends that security for investment and then immediately sells it at a profit upon the rise in the market price which follows the recommendation) could take place if EisnerAmper Wealth Management did not have adequate policies in place to detect such activities. In addition, this requirement can help detect insider trading, "front-running" (i.e., personal trades executed prior to those of EisnerAmper Wealth Management's clients) and other potentially abusive practices.

EisnerAmper Wealth Management has a personal securities transaction policy in place to monitor the personal securities transactions and securities holdings of each of EisnerAmper Wealth Management's "Access Persons." EisnerAmper Wealth Management's securities transaction policy requires that an Access Person of EisnerAmper Wealth Management must provide the Chief Compliance Officer or his/her designee with a written report of their current securities holdings within ten (10) days after becoming an Access Person. Additionally, each Access Person must provide the Chief Compliance Officer or his/her designee with a written report of the Access Person's current securities holdings at least once each twelve (12) month period thereafter on a date EisnerAmper Wealth Management selects; provided, however that at any time that the *Firm* has only one Access Person, he or she shall not be required to submit any securities report described above.

- D. EisnerAmper Wealth Management and/or representatives of EisnerAmper Wealth Management *may* buy or sell securities, at or around the same time as those securities are recommended to clients. This practice creates a situation where EisnerAmper Wealth

Management and/or representatives of the firm are in a position to materially benefit from the sale or purchase of those securities. Therefore, this situation creates a conflict of interest. As indicated above in Item 11.C, EisnerAmper Wealth Management has a personal securities transaction policy in place to monitor the personal securities transaction and securities holdings of each of EisnerAmper Wealth Management's Access Persons.

## **Item 12 Brokerage Practices**

- A. In the event that the client requests that EisnerAmper Wealth Management recommend a broker-dealer/custodian for execution and/or custodial services (exclusive of those clients that may direct EisnerAmper Wealth Management to use a specific broker-dealer/custodian), EisnerAmper Wealth Management generally recommends that investment management accounts be maintained at *Schwab* and/or *SEI*. Prior to engaging EisnerAmper Wealth Management to provide investment management services, the client will be required to enter into a formal *Investment Advisory Agreement* with EisnerAmper Wealth Management setting forth the terms and conditions under which EisnerAmper Wealth Management shall manage the client's assets, and a separate custodial/clearing agreement with each designated broker-dealer/custodian.

Factors that EisnerAmper Wealth Management considers in recommending *Schwab* and/or *SEI* (or any other broker-dealer/custodian to clients) include historical relationship with EisnerAmper Wealth Management, financial strength, reputation, execution capabilities, pricing, research, and service. Although the commissions and/or transaction fees paid by EisnerAmper Wealth Management's clients shall comply with EisnerAmper Wealth Management's duty to seek best execution, a client may pay a commission that is higher than another qualified broker-dealer might charge to effect the same transaction where EisnerAmper Wealth Management determines, in good faith, that the commission/transaction fee is reasonable. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including the value of research provided, execution capability, commission rates, and responsiveness. Accordingly, although EisnerAmper Wealth Management will seek competitive rates, it may not necessarily obtain the lowest possible commission rates for client account transactions. The brokerage commissions or transaction fees charged by the designated broker-dealer/custodian are exclusive of, and in addition to, EisnerAmper Wealth Management's investment management fee. EisnerAmper Wealth Management's best execution responsibility is qualified if securities that it purchases for client accounts are mutual funds that trade at net asset value as determined at the daily market close.

1. Research and Additional Benefits. Although not a material consideration when determining whether to recommend that a client utilize the services of a particular broker-dealer/custodian, EisnerAmper Wealth Management receives from *Schwab* and/or *SEI* (or another broker-dealer/custodian, investment platform, unaffiliated investment manager, vendor, unaffiliated product/fund sponsor, or vendor) without cost (and/or at a discount) support services and/or products, certain of which assist EisnerAmper Wealth Management to better monitor and service client accounts maintained at such institutions. Included within the support services that may be obtained by EisnerAmper Wealth Management may be investment-related research, pricing information and market data, software and other technology that provide access to client account data, compliance and/or practice management-related publications,

discounted or gratis consulting services, discounted and/or gratis attendance at conferences, meetings, and other educational and/or social events, marketing support, computer hardware and/or software and/or other products used by EisnerAmper Wealth Management in furtherance of its investment advisory business operations.

As indicated above, certain of the support services and/or products that *may* be received may assist EisnerAmper Wealth Management in managing and administering client accounts. Others do not directly provide such assistance, but rather assist EisnerAmper Wealth Management to manage and further develop its business enterprise.

There is no corresponding commitment made by EisnerAmper Wealth Management to Schwab and/or SEI or any other entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as a result of the above arrangement.

EisnerAmper Wealth Management's Chief Compliance Officer, Marc L. Scudillo, remains available to address any questions that a client or prospective client may have regarding the above arrangement and any corresponding conflict of interest.

2. EisnerAmper Wealth Management does not receive referrals from broker-dealers.
3. EisnerAmper Wealth Management does not generally accept directed brokerage arrangements (when a client requires that account transactions be effected through a specific broker-dealer). In such client directed arrangements the client will negotiate terms and arrangements for their account with that broker-dealer, and EisnerAmper Wealth Management will not seek better execution services or prices from other broker-dealers or be able to "batch" the client's transactions for execution through other broker-dealers with orders for other accounts managed by EisnerAmper Wealth Management. As a result, client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case.

Please Note: In the event that the client directs EisnerAmper Wealth Management to effect securities transactions for the client's accounts through a specific broker-dealer, the client correspondingly acknowledges that such direction may cause the accounts to incur higher commissions or transaction costs than the accounts would otherwise incur had the client determined to effect account transactions through alternative clearing arrangements that may be available through EisnerAmper Wealth Management. Higher transaction costs adversely impact account performance. **Please Also Note:** Transactions for directed accounts will generally be executed following the execution of portfolio transactions for non-directed accounts.

- B. To the extent that EisnerAmper Wealth Management provides investment management services to its clients, the transactions for each client account generally will be effected independently, unless EisnerAmper Wealth Management decides to purchase or sell the same securities for several clients at approximately the same time. EisnerAmper Wealth Management may (but is not obligated to) combine or "bunch" such orders to seek best execution, to negotiate more favorable commission rates or to allocate equitably among EisnerAmper Wealth Management's clients differences in prices and commissions or other transaction costs that might have been obtained had such orders been placed independently. Under this procedure, transactions will be averaged as to price and will be

allocated among clients in proportion to the purchase and sale orders placed for each client account on any given day. EisnerAmper Wealth Management shall not receive any additional compensation or remuneration as a result of such aggregation.

### **Item 13      Review of Accounts**

- A. For those clients to whom EisnerAmper Wealth Management provides investment supervisory services, account reviews are conducted on an ongoing basis by EisnerAmper Wealth Management's Principals and representatives. All investment supervisory clients are advised that it remains their responsibility to advise EisnerAmper Wealth Management of any changes in their investment objectives and/or financial situation. All clients (in person or via telephone) are encouraged to review financial planning issues (to the extent applicable), investment objectives and account performance with EisnerAmper Wealth Management on an annual basis.
- B. EisnerAmper Wealth Management may conduct account reviews on an other than periodic basis upon the occurrence of a triggering event, such as a change in client investment objectives and/or financial situation, market corrections and client request.
- C. Clients are provided, at least quarterly, with written transaction confirmation notices and regular written summary account statements directly from the broker-dealer/custodian and/or program sponsor for the client accounts. EisnerAmper Wealth Management may also provide a written periodic report summarizing account activity and performance.

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

- A. As referenced in Item 12.A.1 above, EisnerAmper Wealth Management receives an economic benefit from *Schwab* and/or *SEI*. EisnerAmper Wealth Management, without cost (and/or at a discount), receives support services and/or products from *Schwab* and/or *SEI*.

There is no corresponding commitment made by EisnerAmper Wealth Management to *Schwab* and/or *SEI* or any other entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as a result of the above arrangement.

- B. EisnerAmper Wealth Management does not compensate, directly or indirectly, any person, other than its representatives, for client referrals.

### **Item 15      Custody**

EisnerAmper Wealth Management shall have the ability to have its advisory fee for each client debited by the custodian on a quarterly basis. Clients are provided, at least quarterly, with written transaction confirmation notices and regular written summary account statements directly from the broker-dealer/custodian and/or program sponsor for the client accounts. EisnerAmper Wealth Management may also provide a written periodic report summarizing account activity and performance.

Please Note: To the extent that EisnerAmper Wealth Management provides clients with periodic account statements or reports, the client is urged to compare any statement or report provided by EisnerAmper Wealth Management with the account statements received from the account custodian. Please Also Note: The account custodian does not verify the accuracy of EisnerAmper Wealth Management's advisory fee calculation.

#### **Item 16 Investment Discretion**

The client can determine to engage EisnerAmper Wealth Management to provide investment advisory services on a discretionary basis. Prior to EisnerAmper Wealth Management assuming discretionary authority over a client's account, the client shall be required to execute an *Investment Advisory Agreement*, naming EisnerAmper Wealth Management as the client's attorney and agent in fact, granting EisnerAmper Wealth Management full authority to buy, sell, or otherwise effect investment transactions involving the assets in the client's name found in the discretionary account.

Clients who engage EisnerAmper Wealth Management on a discretionary basis may, at any time, impose restrictions, in writing, on EisnerAmper Wealth Management's discretionary authority (i.e. limit the types/amounts of particular securities purchased for their account, exclude the ability to purchase securities with an inverse relationship to the market, limit or proscribe EisnerAmper Wealth Management's use of margin, etc.).

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

- A. Except for client assets managed by *Independent Manager[s]* that maintain proxy voting authority, it is EisnerAmper Wealth Management's general policy that clients maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets.
- B. Clients will receive their proxies or other solicitations directly from their custodian. Clients may contact EisnerAmper Wealth Management to discuss any questions they may have with a particular solicitation.

#### **Item 18 Financial Information**

- A. EisnerAmper Wealth Management does not solicit fees of more than \$1,200, per client, six months or more in advance.
- B. EisnerAmper Wealth Management is unaware of any financial condition that is reasonably likely to impair its ability to meet its contractual commitments relating to its discretionary authority over certain client accounts.
- C. EisnerAmper Wealth Management has not been the subject of a bankruptcy petition.

**ANY QUESTIONS: EisnerAmper Wealth Management's Chief Compliance Officer, Marc L. Scudillo, remains available to address any questions that a client or prospective client may have regarding the above disclosures and arrangements.**

**Item 1 Cover Page**

A.

**Marc L. Scudillo**

EisnerAmper Wealth Management  
& Corporate Benefits, LLC

ADV Part 2B, Brochure Supplement  
Dated: March 15, 2019

Contact: Marc L. Scudillo, Chief Compliance Officer  
111 Wood Avenue South, Suite 110  
Iselin, New Jersey 08830

B.

**This Brochure Supplement provides information about Marc L. Scudillo that supplements the EisnerAmper Wealth Management & Corporate Benefits, LLC Brochure; you should have received a copy of that Brochure. Please contact Marc L. Scudillo, Chief Compliance Officer, if you did *not* receive EisnerAmper Wealth Management & Corporate Benefits, LLC's Brochure or if you have any questions about the contents of this supplement.**

**Additional information about Marc L. Scudillo is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

**Item 2 Education Background and Business Experience**

Marc L. Scudillo was born in 1972. Mr. Scudillo graduated from Colgate University, with a Bachelor of Arts degree in Economics and German. Mr. Scudillo graduated from New York University, Stern School of Business with a Master of Business Administration degree in Finance and a Master of Science degree in Accounting. Mr. Scudillo has been the Managing Officer and an investment adviser representative of EisnerAmper Wealth Management and Corporate Benefits, LLC since September of 2001. Mr. Scudillo has also been a registered representative of APW Capital, Inc. (formerly known as Comprehensive Asset Management & Servicing, Inc.) since April of 2010.

Mr. Scudillo has held the designation of Certified Public Accountant (“CPA”) since 1996. CPAs are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include minimum college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting), minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA), and successful passage of the Uniform CPA Examination. In order to maintain a CPA license, states generally require the completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a two year period or 120 hours over a three year period). Additionally, all American Institute of Certified Public Accountants (AICPA) members are required to follow a rigorous *Code of Professional Conduct* which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interest (and obtain client consent if a conflict exists), maintain client confidentiality, disclose to the client any commission or referral fees, and serve the public interest when providing financial services. The vast majority of state boards of accountancy have adopted the AICPA’s *Code of Professional Conduct* within their state accountancy laws or have created their own.

Mr. Scudillo has been a CERTIFIED FINANCIAL PLANNER™ since 1998. The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 83,000 individuals have obtained CFP® certification in the United States.

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

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered over a 6 hour period, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;

- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year) or two years of Apprenticeship experience that meets additional requirements; and
- Ethics – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

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

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

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

### **Item 3 Disciplinary Information**

None.

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

A. **Registered Representative of Aurora Private Wealth.** Mr. Scudillo is a registered representative of Aurora Private Wealth (“*APW Capital, Inc.*”), an SEC Registered and FINRA member broker-dealer. Clients may choose to engage Mr. Scudillo in his individual capacity as a registered representative of *APW Capital, Inc.*, to implement investment recommendations on a commission basis.

1. **Conflict of Interest** The recommendation by Mr. Scudillo that a client purchase a securities commission product presents a conflict of interest, as the receipt of commissions may provide an incentive to recommend investment products based on commissions to be received, rather than on a particular client’s need. No client is under any obligation to purchase any commission products from Mr. Scudillo. Clients are reminded that they may purchase investment products recommended by Mr. Scudillo through other, non-affiliated broker dealers. **The Registrant’s Chief Compliance Officer, Marc L. Scudillo, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

2. **Commissions** In the event the client chooses to purchase investment products through *APW Capital, Inc.*, brokerage commissions will be charged by *APW Capital, Inc.* to effect securities transactions, a portion of which commissions shall be paid by *APW Capital, Inc.* to Mr. Scudillo. The brokerage commissions charged by *APW Capital, Inc.* may be higher or lower than those charged by other broker-dealers. The securities commission business conducted by Mr. Scudillo is separate and apart from Registrant's investment management services discussed in the Registrant's *Brochure*.

B. **Licensed Insurance Agents.** Marc L. Scudillo is also an owner of EisnerAmper Financial Insurance Services, LLC a New Jersey licensed insurance agency, and in such capacity may offer for sale, insurance-related products on a commission basis, including the sale of such products to investment advisory clients of the Registrant. In addition, Mr. Scudillo, in their his individual capacity, serves as a licensed insurance agent with various insurance companies, and may, in such individual capacity, recommend the purchase of certain insurance-related products on a commission basis to Registrant's advisory clients.

The recommendation by Mr. Scudillo that a client purchase an insurance commission product from EisnerAmper Financial Insurance Services, LLC and/or Mr. Scudillo presents a conflict of interest, as the receipt of commissions may provide an incentive to recommend investment products based on commissions to be received, rather than on a particular client's need. No client is under any obligation to purchase any commission products from EisnerAmper Financial Insurance Services, LLC and/or Mr. Scudillo. Clients are reminded that they may purchase insurance products recommended by Mr. Scudillo through other non-affiliated insurance agents. **The Registrant's Chief Compliance Officer, Marc L. Scudillo, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

**Certified Public Accountant.** Although Mr. Scudillo is a Certified Public Accountant, he does not render accounting advice or tax preparation services to the Registrant's clients. Rather, to the extent that a client requires accounting advice and/or tax preparation services, Mr. Scudillo, if requested, may recommend the services of another Certified Public Accountant, all of which services shall be rendered independent of the Registrant pursuant to a separate agreement between the client and the Certified Public Accountant. Registrant shall not receive any of the fees charged by any recommended Certified Public Accountant, referral or otherwise. EisnerAmper LLP ("EA"), a Certified Public Accounting firm with whom the Registrant shares office space and administrative personnel, is the fifty percent (50%) owner of the Registrant. EA provides accounting and/or tax preparation services, including to clients of the Registrant. To the extent that EA provides accounting and/or tax preparation services to any clients, including clients of the Registrant, all such services shall be performed by EA, independent of the Registrant, for which services Registrant shall not receive any portion of the fees charged by EA, referral or otherwise. It is expected that

members of EA, solely incidental to their respective practices as Certified Public Accountants, shall recommend the Registrant's services to certain of EA's clients. Neither EA, nor any of its members, shall receive referral fees from the Registrant. However, members of EA shall be entitled to receive distributions relative to their respective ownership interests in Registrant. Neither EA, nor any of its members, are currently involved in providing investment advice on behalf of the Registrant, nor does EA, hold itself out as providing advisory services on its own behalf or on behalf of the Registrant.

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

None.

#### **Item 6 Supervision**

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Adviser's Act ("*Act*"). The Registrant's Chief Compliance Officer, Marc L. Scudillo, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of the Registrant have any questions regarding the applicability/relevance of the *Act*, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Mr. Scudillo at (908) 429-0025.

## Item 1 Cover Page

A.

### **Steven S. Wang**

EisnerAmper Wealth Management  
& Corporate Benefits, LLC

ADV Part 2B, Brochure Supplement  
Dated: March 15, 2019

Contact: Marc L. Scudillo, Chief Compliance Officer  
111 Wood Avenue South, Suite 110  
Iselin, New Jersey 08830

B.

**This Brochure Supplement provides information about Steven S. Wang that supplements the EisnerAmper Wealth Management & Corporate Benefits, LLC Brochure; you should have received a copy of that Brochure. Please contact Marc L. Scudillo, Chief Compliance Officer, if you did *not* receive EisnerAmper Wealth Management & Corporate Benefits, LLC's Brochure or if you have any questions about the contents of this supplement.**

**Additional information about Steven S. Wang is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

## **Item 2 Education Background and Business Experience**

Steven S. Wang was born in 1970. Mr. Wang graduated from Tamkang University, with a Bachelor of Business Administration and from Pace University with a Master of Science degree. Mr. Wang has been employed as a registered investment adviser and Assistant Insurance Agent of EisnerAmper Wealth Management and Corporate Benefits, LLC since May of 2003. Mr. Wang has also been a registered representative of APW Capital, Inc. (formerly known as Comprehensive Asset Management & Servicing, Inc.) since April of 2010.

Mr. Wang has been a CFA<sup>®</sup> Charter Holder since 2003. CFA<sup>®</sup> designates an international professional certificate that is offered by the CFA Institute.

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

There are currently more than 154,000 CFA charter holders working in 165 countries. To earn the CFA charter, candidates must: (1) pass three sequential, six-hour examinations; (2) have at least four years of qualified professional investment experience; (3) join CFA Institute as members; and (4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

### **High Ethical Standards**

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

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

### **Global Recognition**

Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study per level). Earning the CFA charter demonstrates mastery of many of the advanced skills needed for investment analysis and decision making in today's quickly evolving global financial industry. As a result, employers and clients are increasingly seeking CFA charterholders—often making the charter a prerequisite for employment. Additionally, regulatory bodies in 38 countries/territories recognize the CFA charter as a proxy for meeting certain licensing requirements, and more than 466 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.

### **Comprehensive and Current Knowledge**

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

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

### Item 3 Disciplinary Information

None.

### Item 4 Other Business Activities

A. **Registered Representative of Aurora Private Wealth.** Mr. Wang is a registered representative of Aurora Private Wealth (“*APW Capital, Inc.*”), an SEC Registered and FINRA member broker-dealer. Clients may choose to engage Mr. Wang in his individual capacity as a registered representative of *APW Capital, Inc.*, to implement investment recommendations on a commission basis.

1. **Conflict of Interest** The recommendation by Mr. Wang that a client purchase a securities commission product presents a conflict of interest, as the receipt of commissions may provide an incentive to recommend investment products based on commissions to be received, rather than on a particular client’s need. No client is under any obligation to purchase any commission products from Mr. Wang. Clients are reminded that they may purchase investment products recommended by Mr. Wang through other, non-affiliated broker dealers. **The Registrant’s Chief Compliance Officer, Marc L. Scudillo, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

2. **Commissions** In the event the client chooses to purchase investment products through *APW Capital, Inc.*, brokerage commissions will be charged by *APW Capital, Inc.* to effect securities transactions, a portion of which commissions shall be paid by *APW Capital, Inc.* to Mr. Wang. The brokerage commissions charged by *APW Capital, Inc.* may be higher or lower than those charged by other broker-dealers. The securities commission business conducted by Mr. Wang is separate and apart from Registrant’s investment management services discussed in the Registrant’s *Brochure*.

B. The supervised person is not actively engaged in any non-investment-related business or occupation for compensation.

### Item 5 Additional Compensation

None.

## **Item 6 Supervision**

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Adviser's Act ("*Act*"). The Registrant's Chief Compliance Officer, Marc L. Scudillo, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of the Registrant have any questions regarding the applicability/relevance of the *Act*, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Mr. Scudillo at (908) 429-0025.

## Item 1 Cover Page

A.

### **Yuri Kapilovich**

EisnerAmper Wealth Management  
& Corporate Benefits, LLC

Brochure Supplement  
Dated: March 15, 2019

Contact: Marc L. Scudillo, Chief Compliance Officer  
111 Wood Avenue South, Suite 110  
Iselin, New Jersey 08830

B.

**This Brochure Supplement provides information about Yuri Kapilovich that supplements the EisnerAmper Wealth Management & Corporate Benefits, LLC Brochure; you should have received a copy of that Brochure. Please contact Marc L. Scudillo, Chief Compliance Officer, if you did *not* receive EisnerAmper Wealth Management & Corporate Benefits, LLC's Brochure or if you have any questions about the contents of this supplement.**

**Additional information about Yuri Kapilovich is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

## Item 2 Education Background and Business Experience

Yuri Kapilovich was born in 1988. Mr. Kapilovich graduated from Rutgers University with a Bachelor of Science degree in Accounting and from Philadelphia University with a Master's of Science degree in Taxation. Since June 2015, he has been a Tax Senior Accountant of EisnerAmper Wealth Management & Corporate Benefits, LLC. From January 2012 to May 2015, Mr. Kapilovich was a Senior Tax Accountant with Ernst & Young Investment Advisers LLP. From July 2011 through December 2011, Mr. Kapilovich was a Tax Accountant with CBIZ MHM, LLC. From September 2010 through December 2010, Mr. Kapilovich was an Intern with McGladrey.

Mr. Kapilovich has held the designation of Certified Public Accountant (“CPA”) since January 2013. CPAs are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include minimum college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting), minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA), and successful passage of the Uniform CPA Examination. In order to maintain a CPA license, states generally require the completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a two year period or 120 hours over a three year period). Additionally, all American Institute of Certified Public Accountants (AICPA) members are required to follow a rigorous *Code of Professional Conduct* which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interest (and obtain client consent if a conflict exists), maintain client confidentiality, disclose to the client any commission or referral fees, and serve the public interest when providing financial services. The vast majority of state boards of accountancy have adopted the AICPA’s *Code of Professional Conduct* within their state accountancy laws or have created their own.

### **Item 3 Disciplinary Information**

None.

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

- A. The supervised person is not actively engaged in any other investment-related businesses or occupations.
- B. **Certified Public Accountant (CPA)**. Mr. Kapilovich, in his individual capacity, is a certified public accountant, and may recommend his tax preparation and/or accounting services. **Conflict of Interest**: The recommendation by Mr. Kapilovich that a client elect his accounting services presents a *conflict of interest*, as the receipt of fees for accounting services may provide an incentive to recommend such services, rather than recommending such services based upon a particular client’s needs. No client is under any obligation to utilize Mr. Kapilovich for accounting services. Clients are reminded that they may elect to obtain accounting services recommended by Mr. Kapilovich through other non-affiliated certified public accountants. **The Registrant’s Chief Compliance Officer, Marc L. Scudillo, remains available to address any questions that a client or prospective may have regarding the above conflict of interest.**

### **Item 5 Additional Compensation**

None.

## **Item 6 Supervision**

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Adviser's Act ("*Act*"). The Registrant's Chief Compliance Officer, Marc L. Scudillo, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of the Registrant have any questions regarding the applicability/relevance of the *Act*, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Mr. Scudillo at (908) 429-0025.

**Item 1 Cover Page**

A.

**Lawrence Seigelstein**

EisnerAmper Wealth Management  
& Corporate Benefits, LLC

Brochure Supplement  
Dated: March 15, 2019

Contact: Marc L. Scudillo, Chief Compliance Officer  
111 Wood Avenue South, Suite 110  
Iselin, New Jersey 08830

B.

**This Brochure Supplement provides information about Lawrence Seigelstein that supplements the EisnerAmper Wealth Management & Corporate Benefits, LLC Brochure; you should have received a copy of that Brochure. Please contact Marc L. Scudillo, Chief Compliance Officer, if you did *not* receive EisnerAmper Wealth Management & Corporate Benefits, LLC's Brochure or if you have any questions about the contents of this supplement.**

**Additional information about Lawrence Seigelstein is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

**Item 2 Education Background and Business Experience**

Lawrence Seigelstein was born in 1965. Mr. Seigelstein graduated from the State University of New York at Albany with a Bachelor of Arts degree in Economics. Since September 2008, Mr. Seigelstein has been an investment adviser representative of EisnerAmper Wealth Management & Corporate Benefits, LLC and since May 2016, he has been an investment adviser representative. Mr. Seigelstein has also been a registered representative of APW Capital, Inc. (formerly known as Comprehensive Asset Management & Servicing, Inc.) since August 2010.

Mr. Seigelstein has held the designation of Accredited Investment Fiduciary® (AIF®) since June 1, 2011. The AIF Designation certifies that the recipient has specialized knowledge of fiduciary standards of care and their application to the investment management process. To receive the AIF Designation, the individual must meet prerequisite criteria based on a combination of education, relevant industry experience, and/or ongoing professional development, complete a training program, successfully pass a comprehensive, closed-book final examination under the supervision of a proctor and agree to abide by the Code of Ethics and Conduct Standards. In order to maintain the AIF Designation, the individual must annually attest to the Code of Ethics and Conduct Standards, and accrue and report a minimum of six hours of continuing education. The Designation is administered by the Center for Fiduciary Studies, the standards-setting body of fi360.

### Item 3 Disciplinary Information

None.

### Item 4 Other Business Activities

- A. **Registered Representative of Aurora Private Wealth.** Mr. Seigelstein is a registered representative of Aurora Private Wealth (“APW Capital, Inc.”), an SEC Registered and FINRA member broker-dealer. Clients may choose to engage Mr. Seigelstein in his individual capacity as a registered representative of APW Capital, Inc., to implement investment recommendations on a commission basis.
1. **Conflict of Interest** The recommendation by Mr. Seigelstein that a client purchase a securities commission product presents a conflict of interest, as the receipt of commissions may provide an incentive to recommend investment products based on commissions to be received, rather than on a particular client’s need. No client is under any obligation to purchase any commission products from Mr. Seigelstein. Clients are reminded that they may purchase investment products recommended by Mr. Seigelstein through other, non-affiliated broker dealers. **The Registrant’s Chief Compliance Officer, Marc L. Scudillo, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**
  2. **Commissions** In the event the client chooses to purchase investment products through APW Capital, Inc., brokerage commissions will be charged by APW Capital, Inc. to effect securities transactions, a portion of which commissions shall be paid by APW Capital, Inc. to Mr. Seigelstein. The brokerage commissions charged by APW Capital, Inc. may be higher or lower than those charged by other broker-dealers. The securities commission business conducted by Mr. Seigelstein is separate and apart from Registrant’s investment management services discussed in the Registrant’s *Brochure*.

B. **Licensed Insurance Agent.** Mr. Seigelstein, in his individual capacity, is a licensed insurance agent, and may recommend the purchase of certain insurance-related products on a commission basis. Clients can engage Mr. Seigelstein to purchase insurance products on a commission basis. **Conflict of Interest:** The recommendation by Mr. Seigelstein that a client purchase an insurance commission product presents a *conflict of interest*, as the receipt of commissions may provide an incentive to recommend insurance products based on commissions to be received, rather than on a particular client's need. No client is under any obligation to purchase any insurance commission products from Mr. Seigelstein. Clients are reminded that they may purchase insurance products recommended by Mr. Seigelstein through other, non-affiliated insurance agents. **The Registrant's Chief Compliance Officer, Marc L. Scudillo, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

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

None.

#### **Item 6 Supervision**

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Adviser's Act ("Act"). The Registrant's Chief Compliance Officer, Marc L. Scudillo, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of the Registrant have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Mr. Scudillo at (908) 429-0025.

**Item 1 Cover Page**

A.

**Andrew Evan Harper**

EisnerAmper Wealth Management  
& Corporate Benefits, LLC

ADV Part 2B, Brochure Supplement  
Dated: March 15, 2019

Contact: Marc L. Scudillo, Chief Compliance Officer  
111 Wood Avenue South, Suite 110  
Iselin, New Jersey 08830

B.

**This Brochure Supplement provides information about Andrew E. Harper that supplements the EisnerAmper Wealth Management & Corporate Benefits, LLC Brochure; you should have received a copy of that Brochure. Please contact Marc L. Scudillo, Chief Compliance Officer, if you did *not* receive EisnerAmper Wealth Management & Corporate Benefits, LLC's Brochure or if you have any questions about the contents of this supplement.**

**Additional information about Andrew E. Harper is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

**Item 2 Education Background and Business Experience**

Andrew E. Harper was born in 1978. Mr. Harper graduated from Eckerd College, with a Bachelor of Arts degree in Management. Mr. Harper has been employed as the Manager of Group Retirement Plans of EisnerAmper Wealth Management and Corporate Benefits, LLC since July of 2017. Mr. Harper has also been a registered representative of APW Capital, Inc. (formerly known as Comprehensive Asset Management & Servicing, Inc.) since July 2017.

Mr. Harper became an ACCREDITED INVESTMENT FIDUCIARY® (AIF®) in 2008. The AIF Designation certifies that the recipient has specialized knowledge of fiduciary standards of care and their application to the investment management process. To receive the AIF Designation, the individual must meet prerequisite criteria based on a combination of education, relevant industry experience, and/or ongoing professional development, complete a training program, successfully pass a comprehensive, closed-book final examination under the supervision of a proctor and

agree to abide by the Code of Ethics and Conduct Standards. In order to maintain the AIF Designation, the individual must annually attest to the Code of Ethics and Conduct Standards, and accrue and report a minimum of six hours of continuing education. The Designation is administered by the Center for Fiduciary Studies, the standards-setting body of fi360.

Mr. Harper has held the designation of Chartered Retirement Plans Specialist<sup>SM</sup> (CRPS) since 2016. The College of Financial Planning® awards the CRPS designation to applicants who complete the CRPS professional education program, pass a final examination, commit to a code of ethics and agree to pursue continuing education. Continued use of the CRPS designation is subject to ongoing renewal requirements. Every two (2) years the designee must renew their right to continue using the CRPC® designation by completing 16 hours of continuing education and reaffirming to abide by the Standards of Professional Conduct.

### **Item 3 Disciplinary Information**

None.

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

A. **Registered Representative of Aurora Private Wealth.** Mr. Harper is a registered representative of Aurora Private Wealth (“*APW Capital, Inc.*”), an SEC Registered and FINRA member broker-dealer. Clients may choose to engage Mr. Harper in his individual capacity as a registered representative of *APW Capital, Inc.*, to implement investment recommendations on a commission basis.

1. **Conflict of Interest** The recommendation by Mr. Harper that a client purchase a securities commission product presents a conflict of interest, as the receipt of commissions may provide an incentive to recommend investment products based on commissions to be received, rather than on a particular client’s need. No client is under any obligation to purchase any commission products from Mr. Harper. Clients are reminded that they may purchase investment products recommended by Mr. Harper through other, non-affiliated broker dealers. **The Registrant’s Chief Compliance Officer, Marc L. Scudillo, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**
2. **Commissions** In the event the client chooses to purchase investment products through *APW Capital, Inc.*, brokerage commissions will be charged by *APW Capital, Inc.* to effect securities transactions, a portion of which commissions shall be paid by *APW Capital, Inc.* to Mr. Harper. The brokerage commissions charged by *APW Capital, Inc.* may be higher or lower than those charged by other broker-dealers. The securities commission business conducted by Mr. Harper is separate and apart from Registrant’s investment management services discussed in the Registrant’s *Brochure*.

- B. The supervised person is not actively engaged in any non-investment-related business or occupation for compensation.

**Item 5 Additional Compensation**

None.

**Item 6 Supervision**

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Adviser's Act ("*Act*"). The Registrant's Chief Compliance Officer, Marc L. Scudillo, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of the Registrant have any questions regarding the applicability/relevance of the *Act*, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Mr. Scudillo at (908) 429-0025.

## Item 1 Cover Page

A.

### **Christopher Michael Gibbons**

EisnerAmper Wealth Management  
& Corporate Benefits, LLC

ADV Part 2B, Brochure Supplement  
Dated: March 15, 2019

Contact: Marc L. Scudillo, Chief Compliance Officer  
111 Wood Avenue South, Suite 110  
Iselin, New Jersey 08830

B.

**This Brochure Supplement provides information about Christopher M. Gibbons that supplements the EisnerAmper Wealth Management & Corporate Benefits, LLC Brochure; you should have received a copy of that Brochure. Please contact Marc L. Scudillo, Chief Compliance Officer, if you did *not* receive EisnerAmper Wealth Management & Corporate Benefits, LLC's Brochure or if you have any questions about the contents of this supplement.**

**Additional information about Christopher M. Gibbons is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

## **Item 2 Education Background and Business Experience**

Christopher M. Gibbons was born in 1982. Mr. Gibbons graduated from Pennsylvania State University with a Bachelor of Philosophy degree and received a Masters of Liberal Arts degree from the University of Pennsylvania. Mr. Gibbons has been a Wealth Manager with EisnerAmper Wealth Management and Corporate Benefits, LLC since September 2018. Mr. Gibbons has also been a registered representative of APW Capital, Inc. (formerly known as Comprehensive Asset Management & Servicing, Inc.) since October 2018. From October 2017 through September 2018, Mr. Gibbons was a Senior Financial Advisor with Wisdom Planning, LLC and Cordasco Financial Network, LLC as well as a registered representative of Andrew Garrett. From June 2007 through September 2017, Mr. Gibbons was a registered representative of Thrivent Investment Management Inc. and a Financial Representative with Thrivent Financial for Lutherans.

Mr. Gibbons has been a CERTIFIED FINANCIAL PLANNER™ since 2013. The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 83,000 individuals have obtained CFP® certification in the United States.

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

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 6 hours, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

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

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

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

Mr. Gibbons has held the designation of FIC (Fraternal Insurance Counselor) since 2008. The FIC requires, as a prerequisite twelve consecutive months of work experience and good standing with a fraternal benefit society which is a member of the National Fraternal Congress of America and the Fraternal Field Managers' Association, or the Canadian Fraternal Congress. The candidate must complete four courses and pass a final written examination.

Mr. Gibbons has held the designation of Chartered Life Underwriter (CLU®) since 2015. Since 1927, the CLU® has been the respected risk management credential for advisors. Designees have completed eight or more college-level courses representing an average study time of 400 hours. Topics for required courses include insurance and financial planning, life insurance law, estate planning, and planning for business owners and professionals. Elective courses include such advanced topics as income taxes, group benefits, retirement planning, and health insurance. CLU® designees must meet experience and continuing education requirements and must adhere to a high ethical standard. The mark is awarded by The American College, a non-profit educator with the top level of academic accreditation.

Mr. Gibbons has held the designation of CAP® (Chartered Advisor in Philanthropy®) since 2017. The advisor earning the CAP® designation has taken three graduate school courses in philanthropy including planning for impact in the context of family wealth, charitable strategies, and gift planning in a nonprofit context. The courses are offered through the Irwin Graduate School of The American College, a non-profit educator with an 84-year heritage and the highest level of academic accreditation. CAP® advisors must meet experience, ethics, and continuing education requirements to use the credential.

### **Item 3 Disciplinary Information**

None.

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

A. **Registered Representative of Aurora Private Wealth.** Mr. Gibbons is a registered representative of Aurora Private Wealth ("*APW Capital, Inc.*"), an SEC Registered and FINRA member broker-dealer. Clients may choose to engage Mr. Gibbons in his individual capacity as a registered representative of *APW Capital, Inc.*, to implement investment recommendations on a commission basis.

1. **Conflict of Interest** The recommendation by Mr. Gibbons that a client purchase a securities commission product presents a conflict of interest, as the receipt of commissions may provide an incentive to recommend investment products based on commissions to be received, rather than on a particular client's need. No client is under any obligation to purchase any

commission products from Mr. Gibbons. Clients are reminded that they may purchase investment products recommended by Mr. Gibbons through other, non-affiliated broker dealers. **The Registrant's Chief Compliance Officer, Marc L. Scudillo, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

2. **Commissions** In the event the client chooses to purchase investment products through *APW Capital, Inc.*, brokerage commissions will be charged by *APW Capital, Inc.* to effect securities transactions, a portion of which commissions shall be paid by *APW Capital, Inc.* to Mr. Gibbons. The brokerage commissions charged by *APW Capital, Inc.* may be higher or lower than those charged by other broker-dealers. The securities commission business conducted by Mr. Gibbons is separate and apart from Registrant's investment management services discussed in the Registrant's *Brochure*.

- B. **Licensed Insurance Agent.** Mr. Gibbons, in his individual capacity, is a licensed insurance agent, and may recommend the purchase of certain insurance-related products on a commission basis. Clients can engage Mr. Gibbons to purchase insurance products on a commission basis. **Conflict of Interest:** The recommendation by Mr. Gibbons that a client purchase an insurance commission product presents a *conflict of interest*, as the receipt of commissions may provide an incentive to recommend insurance products based on commissions to be received, rather than on a particular client's need. No client is under any obligation to purchase any insurance commission products from Mr. Gibbons. Clients are reminded that they may purchase insurance products recommended by Mr. Gibbons through other, non-affiliated insurance agents. **The Registrant's Chief Compliance Officer, Marc L. Scudillo, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

## **Item 5 Additional Compensation**

None.

## **Item 6 Supervision**

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Adviser's Act ("Act"). The Registrant's Chief Compliance Officer, Marc L. Scudillo, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of the Registrant have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Mr. Scudillo at (908) 429-0025.