

**Heritage Investment Group, Inc.**  
**Customer Relationship Summary – (Updated September 2023)**

**Item 1. Introduction**

Heritage Investment Group, Inc. (“Heritage”) is an investment adviser registered with the U.S. Securities and Exchange Commission. Investment advisory services and fees differ from those of broker-dealer firms; therefore, it is important to understand the differences. Educational information regarding investment advisors, broker-dealers and investing can be located at [Investor.gov/CRS](https://investor.gov/CRS).

**Item 2. Relationships and Services**

*“What investment services and advice can you provide me?”*

**Description of Services and Monitoring**

We provide investment advisory services (not brokerage services) to individual/retail/institutional investors, including asset management, financial planning, and investment consulting. Reviews of your accounts will be conducted at least quarterly, by one or more of our Investment Advisory Representatives (IARs). The review process includes a review of your goals and objectives, evaluation of the strategy which has been employed, and monitoring the portfolio. As part of our standard services, we review our client accounts regularly and meet with clients at their request. Factors that trigger reviews include changes to our investment recommendations and changes to your financial situation and/or investment needs. Our financial planning services are included as part of our asset management services. Should we create a stand-alone plan, reviews would be conducted on an “as needed” basis.

**Investment Authority**

Heritage typically offers our asset management on a **discretionary** basis. Discretionary asset management allows Heritage the limited authority to trade and rebalance your accounts without requesting permission each time a transaction is placed. Our level of authority is determined at the beginning of our relationship with you in our advisory agreement but can be changed upon request.

**Investment Offerings**

While we can advise on any investment asset, our investment recommendations are primarily focused on investments in mutual funds, ETFs, equities, and federal/state/local bonds. To open and maintain an account, Heritage has a minimum relationship size of \$1,000,000, but at its discretion, accepts accounts/clients below this minimum.

**Additional Information**

For additional information, please see our [Form ADV Part 2A](https://adviserinfo.sec.gov/firm/summary/113204) (with special emphasis on Items 4, 7, and 16 of Part 2A) available at <https://adviserinfo.sec.gov/firm/summary/113204>.

**Conversation Starters\***

- Given my financial situation, should I choose an investment advisory service? Why or why not?
- How will you choose investments to recommend to me?
- What is your relevant experience, including your licenses, education, and other qualifications? What do these qualifications mean?

**Item 3. Fees, Costs, Conflicts, and Standard of Conduct**

*“What fees will I pay?”*

Heritage’s fees are based on the type(s) of service(s) we provide.

For asset management, we bill an annual asset-based fee paid quarterly in advance. The fee is charged as a percentage of the assets that we manage and is tiered. Typically, the percentage fee will decline when the assets under management are in excess of a listed dollar amount as indicated on your Heritage advisory contract, however, the dollar fee will be higher as the value of the account increases. Therefore, we have an incentive to encourage you to increase the assets in your account(s).

Financial planning services are provided in connection with our asset management services at no additional charge. Our services also include the selection of investment vehicles.

It should be noted that legal and/or accounting fees for Heritage’s affiliated legal and accounting professionals, MacLean & Ema P.A. and Hinkle, Richter & Rhine, LLP are separate and distinct from investment related fees and expenses.

**Other Fees and Costs:** Some investments, such as mutual funds and ETFs, have additional fees. Those fees include operating expenses. You may also pay other fees to the custodian of your assets. These include, but may not be limited to, commissions on transactions, fees for wire transfers, stop payments on checks, account maintenance fees, duplicate check or statement fees, overnight delivery charges, returned check, and asset transfer fees.

**Additional Information:** You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce the amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. More detailed information about our fees and costs are included in our [Form ADV Part 2A](https://adviserinfo.sec.gov/firm/summary/113204) (Item 5), available at <https://adviserinfo.sec.gov/firm/summary/113204>

\* Consider asking your financial professional these questions.

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**Conversation Starters\***

- Help me understand how these fees and costs might affect my investments.
- If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?

**“What are your legal obligations to me when acting as my investment adviser?”**

**When we act as your investment adviser**, we must act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice, we provide you. Here are some examples to help you understand what this means.

For example, it should be noted that Heritage may recommend to you the use of legal and accounting services provided by affiliated persons and their firms. Although this practice is helpful in the coordination of wealth management process, it represents a potential conflict of interest in that each affiliated party benefits financially from your use of each respective service should you choose to engage them.

In addition, we recommend independent broker/dealer-custodian, such as Charles Schwab, Fidelity, or other qualified custodian. In light of these recommendations, Heritage participates in, and has agreements with, these respective firms whereby they offer their services to Heritage clients (and other independent investment advisors). We do NOT receive any direct monetary compensation from any custodian for trade execution. However, Fidelity and Schwab offer Heritage clients a variety of services with varying commission and fee schedules that change from time to time. We incur direct costs from these broker/custodians that vary, and they reduce these costs when a specified asset threshold is reached. This causes a potential conflict of interest because we have an incentive to recommend the broker/custodian that will waive certain costs once a specified asset level is reached. To address this conflict, we present to each client the services and costs of each broker/custodian as previously noted. These arrangements and additional information about other conflicts of interest are discussed in more detail in our [Form ADV Part 2A](#), available at <https://adviserinfo.sec.gov/firm/summary/113204>

**“How else does your firm make money and what conflicts of interest do you have?”**

Our only compensation is through the asset management fee that we charge as described above.

**Conversation Starter\***

- How might your conflicts of interest affect me, and how will you address them?

**“How do your financial professionals make money?”**

Our IARs are compensated through salaries and/or a portion of revenue we receive for the advisory services. The portion paid to your IAR does not vary based on the type of investments that are recommended. Separately, certain members of Heritage own and operate a law firm and independent accounting/consulting firm. These Heritage members would receive compensation from their respective firms should you chose to engage them for legal and/or accounting services.

**Item 4. Disciplinary History**

**“Do you or your financial professionals have legal or disciplinary history?”**

No – Neither the Firm nor any of our IARs have a disciplinary history. We invite you to visit [Investor.gov/CRS](http://Investor.gov/CRS) for a free and simple search tool to research our Firm and IARs.

**Conversation Starters\***

- As a financial professional, do you have any disciplinary history?
- For what type of conduct?

**Item 5. Additional Information**

We encourage you to seek out additional information about our investment advisory services in our Form ADV Brochure on [Investor.gov](http://Investor.gov) or [adviserinfo.sec.gov](http://adviserinfo.sec.gov). Alternatively, you can call Heritage at (954) 785-5400 to speak with us directly and request a copy of this relationship summary.

**Conversation Starters\***

- Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer?
- Who can I talk to if I have concerns about how this person is treating me?



**Item 1 – Cover Page**

Heritage Investment Group, Inc.

2480 NE 23<sup>rd</sup> Street

Pompano Beach, FL 33062

(954) 785-5400

[www.heritageinvestment.com](http://www.heritageinvestment.com)

[www.fiduciaryinvesting.com](http://www.fiduciaryinvesting.com)

09/12/2023

This brochure provides information about the qualifications and business practices of HERITAGE INVESTMENT GROUP, INC. [“Heritage”]. Heritage’s IARD firm number is 113204. If you have any questions about the contents of this brochure, please contact us at (954) 785-5400 or htaylor@heritageinvestment.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.

HERITAGE INVESTMENT GROUP, INC. is an SEC Registered Investment Adviser. Please note that SEC registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

Additional information about HERITAGE INVESTMENT GROUP, INC. also is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).



## **Item 2 – Material Changes**

- **NONE**

We have made other changes, some of which clarify or enhance existing disclosures, but we do not consider these other changes to be material.

In the past, we have offered or delivered information about our qualifications and business practices to clients on at least an annual basis. Pursuant to new SEC Rules, we will ensure that you receive a summary of any materials changes to this and subsequent brochures within 120 days of the close of our business' fiscal year. We may further provide other ongoing disclosure information about material changes, as necessary.

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

Currently, our brochure may be obtained free of charge by contacting S. Hardy Taylor, VP, CCO at (954) 785-5400 or htaylor@heritageinvestment.com. Our brochure is also available on our web site, [www.heritageinvestment.com](http://www.heritageinvestment.com).

Additional information about HERITAGE INVESTMENT GROUP, INC. is also available via the SEC's web site [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC's web site also provides information about any persons affiliated with HERITAGE INVESTMENT GROUP, INC. who are registered, or are required to be registered, as investment adviser representatives of HERITAGE INVESTMENT GROUP, INC.

**Item 3 – Table of Contents**

Item 1 – Cover Page.....	i
Item 2 – Material Changes .....	ii
Item 3 – Table of Contents .....	iii
Item 4 – Advisory Business .....	1
Item 5 – Fees and Compensation .....	4
Item 6 – Performance-Based Fees and Side-By-Side Management .....	6
Item 7 – Types of Clients.....	6
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss .....	6
Item 9 – Disciplinary Information.....	9
Item 10 – Other Financial Industry Activities and Affiliations .....	9
Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....	12
Item 12 – Brokerage Practices .....	13
Item 13 – Review of Accounts .....	16
Item 14 – Client Referrals and Other Compensation.....	16
Item 15 – Custody.....	19
Item 16 – Investment Discretion.....	20
Item 17 – Voting Client Securities.....	21
Item 18 – Financial Information .....	21
Item 19 – Privacy Statement .....	22
Brochure Supplement(s)	



## **Item 4 – Advisory Business**

### **ADVISORY SERVICES AND FEES**

Heritage Investment Group, Inc. is a privately owned, fee-only SEC Registered Investment Adviser providing investment and wealth management solutions to individuals, high net worth investors, family trusts, charitable foundations, and qualified plans. Heritage was founded in 1993 to serve the portfolio management needs of the clients of a well-established estate planning law firm in South Florida. It has since grown to serve individual and institutional clients throughout the country. We have experts in the areas of portfolio management, tax management, and advanced wealth transfer planning. Our professionals work as a team to create a unified wealth management experience. This allows you to achieve your goals by alleviating the complexities of investing and by relying upon Heritage to act as your financial director.

Heritage works for you on a fee-only basis. Unlike brokerage firms, we have no commission incentive, nor any other compensation arrangements which could compromise our objectivity. As a fiduciary, we are legally required to act in your best interest at all times.

The firm is owned by its principals, employees, family members or trusts for the benefit of principal family members.

#### **Heritage Owners:**

- 1-Frederick R. MacLean, Jr. Revocable Trust; Frederick R. MacLean, Jr. and Laura MacLean-Co-Trustees
- 2-MacLean Family Trust f/b/o Frederick R. MacLean III, Laura MacLean-Trustee
- 3-MacLean Family Trust f/b/o Madeline R. MacLean, Laura MacLean-Trustee
- 4-The Taylor Family Revocable Trust, Samuel Hardy Taylor and Heide R. Taylor-Co-Trustees
- 5-Timothy Glenn Slattery Revocable Trust, Timothy Glenn Slattery and Jenny Slattery-Co-Trustees
- 6-Robert Ian McCarver and Tracy M. McCarver-Tenants by the Entirety
- 7-Teas Revocable Tenancy by the Entirety Trust dated 09/27/2011, David and Courtney Teas, Co-Trustees



In addition to our SEC registration, we have filed our application to notice file as an investment adviser with the State of Florida Office of Financial Regulation, in order to provide the investment advisory products and services described within this document. We are also notice filed with the States of Alabama, Arkansas, California, Colorado, Connecticut, Delaware, District of Columbia, Georgia, Hawaii, Iowa, Louisiana, Maine, Maryland, Massachusetts, Michigan, Mississippi, New Hampshire, New Jersey, New York, North Carolina, Ohio, Pennsylvania, South Carolina, Tennessee, Texas, Virginia, and Wisconsin.

As of 12/31/2022, Heritage Investment Group, Inc. manages **\$1,502,109,626** of client assets on a discretionary basis serving approximately 818 clients.

Heritage Investment Group, Inc., (“Heritage”) offers the following separate and distinct investment advisory services to clients.

### **1. DISCRETIONARY INVESTMENT MANAGEMENT SERVICES:**

Heritage provides discretionary professional investment management of a client’s individual account(s) and can recommend any number of securities which meet your needs, risk tolerance, objectives, net worth, income, and other relevant factors. Primarily, client portfolios consist of select, Exchange Traded Funds (“ETFs”) and institutional mutual funds (no-load) with various objectives. In addition, if in line with a client’s risk tolerance and investment objective, we may recommend alternative investments (e.g., hedge funds, private equity, REITs, etc.). Our service (at a minimum) provides for an annual re-allocation of assets and counseling with you. To enhance client asset security, Heritage will not act as a qualified custodian holding your funds.

Please note that accounts with margin will be charged margin interest by their custodian when clients utilize it for overdraft protection and/or when there is a trade date/settlement mismatch for certain assets. As part of its investment management philosophy, Heritage does not utilize leverage or borrowing as a tool to manage our client accounts. Additionally, although we do not use lines of credit secured by your securities portfolio in our investment process, upon request, we can assist you in negotiating rates with lender(s), should the need arise.

## **2. MISCELLANEOUS SERVICES**

It should be noted that, in prior years, Heritage offered 1) Non-Discretionary Investment Consulting and Performance Measurement and 2) acted as a Solicitor for several other Registered Investment Advisers located around the country. Heritage no longer offers these services to new clients: however, by agreement and prior to elimination, some existing clients remain with Heritage under these services.

## **3. TRUST PROTECTOR SERVICES**

As part of our wealth management process, we offer trust protector services through our affiliate, Heritage Trust Protector Services, LLC ("HTPS"). A trust protector is an entity appointed in a trust document who has certain powers within the trust to help ensure the grantor's intent is carried out and that the best interests of beneficiaries are maintained. One of the primary functions would be to remove and replace a trustee. Please see Item 10 for more detailed information.

### **IRA Rollover**

For the purpose of complying with the DOL's Prohibited Transaction Exemption 2020-02 ("PTE 2020-02"), when applicable, we are providing the following acknowledgment to clients. When we provide investment advice to clients regarding their retirement plan account or individual retirement account, we are a fiduciary within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with client interests. We operate under an exemption that requires we act in the clients' best interest and not put our or our employees' interests ahead of the clients. Under this exemption, we must:

- meet a professional standard of care when making investment recommendations (give prudent advice),
- never put our or our financial interests ahead of the clients when making recommendations (give loyal advice),
- avoid making misleading statements about conflict of interests, fees, and investments,
- follow policies and procedures designed to ensure that our and our employees give advice that is in the clients' best interest,

- charge no more than is reasonable for services, and
- give the clients basic information about conflict of interests.

We benefit financially from the rollover of the clients’ assets from a retirement account to an account that we manage or provide investment advice, because the assets increase our assets under management and, in turn, our advisory fees.

**Item 5 – Fees and Compensation**

**Fee Schedule:**

The following is Heritage’s standard fee schedule, per account, where Heritage’s advisory services have been contracted. Fees may be negotiable and in certain circumstances, fees may be waived at Heritage’s discretion. The annual fee is divided in installments and billed quarterly in advance based (rounded to the nearest dollar) on the account’s beginning value as of the first day of each calendar quarter. If the account is opened after the start of a calendar quarter, the initial fee will be prorated from the date of the first trade placed in the account through the end of the quarter (or other similar start period of the investment advisory services). Thereafter, unless otherwise provided, all fees are determined on the basis of the market value of the portfolio assets as of the last day of the previous quarter.

Advisory Fee/Equity and Balanced Account Management

Asset Value -Annual Advisory Fee:

First \$500,000 .....	1.25%
Next \$500,000 (\$500,000 to \$1,000,000) .....	1.00%
Next \$2,000,000 (\$1,000,000 to \$3,000,000) .....	0.85%
Next \$2,000,000 (\$3,000,000 to \$5,000,000) .....	0.70%
Next \$20,000,000 (\$5,000,000 to \$25,000,000) .....	0.50%
Next \$25,000,000 (\$25,000,000 to \$50,000,000) .....	0.45%
Next \$50,000,000 (\$50,000,000 to \$100,000,000) .....	0.40%
Over \$100,000,000 .....	0.30%

As a client, you may terminate the contract(s) with Heritage upon five (5) days written notice without the imposition of any penalty. Heritage Investment Group, Inc. will refund the pro rata, unearned portion of the advisory fees paid in advance. You, the client, will receive a full



refund should you terminate the agreement within five (5) business days of signing with Heritage. Clients generally grant the authority to pay Heritage its quarterly fees directly from the client's account held by an independent custodian. Accordingly, you, the client, will provide, in writing, limited authorization to withdraw the contractually agreed upon fees from the account. The custodian of the account is advised in writing of the limitation on Heritage's access to the account. The custodian will also send to you, the client, a statement, at least quarterly, indicating all the amounts disbursed from the account including the amount of advisory fees paid directly to Heritage.

Advisory fees charged are separate and distinct from the fees and expenses charged by mutual funds which may be recommended to you. A description of these and other expenses are available in each fund's prospectus. Certain investments recommended and utilized in your account(s) may be available via other sources. In addition, you may incur certain charges imposed by third parties other than Heritage (such as brokerage fees, transaction costs, custody fees, etc.). All information and advice furnished by either to the other, including their agents and employees, shall be treated as confidential and not disclosed to third parties except as agreed upon in writing or required by law.

**Cash Balances in Accounts:**

Heritage views cash as an asset class and, as such, a portion of your portfolio will be held in cash, cash equivalents and/or money market funds as part of the overall investment strategy for the account(s). Depending on your specific cash flow needs and/or market conditions these cash balances can, at times, be high and represent a material portion of your overall portfolio. Regardless of cash quantities, clients should understand that cash and cash equivalents, including money market funds, are subject to Heritage's advisory fee.

We will deliver the applicable disclosure brochure(s), or Form ADV Part 2A-2B and Form CRS, to you before or at the time we enter into an investment advisory contract with you.

Item 12 further describes the factors that Heritage Investment Group, Inc. considers in selecting or recommending broker-dealers for client transactions and determining the reasonableness of their compensation (*e.g.*, commissions).

It should be noted that legal and/or accounting fees for Heritage's affiliated parties, MacLean & Ema P.A. and Hinkle, Richter & Rhine, LLP are separate and distinct from investment related fees and expenses.

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

Currently, Heritage Investment Group, Inc. does NOT offer any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

### **Item 7 – Types of Clients**

Heritage Investment Group, Inc. generally provides portfolio management services to individuals, high net worth individuals, Trusts, Charitable Institutions, Foundations, Endowments, Corporate Pension, and Profit-Sharing Plans. To open and maintain an account, Heritage has a minimum account size of \$1,000,000, but at its discretion, accepts accounts/clients below this minimum.

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

**Heritage’s portfolio management process is based upon four central concepts:**

**Investing Should Be Scientific Rather Than Speculative** – Markets work. Traditional money managers attempt to outperform the markets by predicting the future, despite overwhelming evidence that such practices are detrimental to portfolio returns. Heritage instead uses scientific, engineered portfolios to harness the power of thousands of stocks, bonds, and commodities from around the world. We do not engage in market timing or any other form of speculation, and we do not pretend to have a crystal ball. Our philosophy emphasizes rationality, investment science, and diversification.

**Risk and Return Are Related** – Investment science has demonstrated that risk and return are inseparable. However, the vast majority of the emphasis on Wall Street is dedicated to portfolio returns, while risk is often ignored. At Heritage, we focus our efforts on the science of risk control rather than on misguided and futile attempts to control returns by predicting the future. We use global, comprehensive diversification to eliminate risks that are not worth

taking, while we deliberately structure our portfolios to take advantage of other risks with the potential to compensate our clients with higher returns.

**Markets and Investment Science Are Constantly Evolving** – As with any science, the science of investing is constantly evolving, and the Heritage portfolio strategy evolves with it. We maintain an open dialogue with prominent university professors in the field of financial economics, and our portfolio strategies will change as new evidence on the nature of capital markets is uncovered. The strategy is always moving forward, but the work is never finished.

**Discipline Is Critical and Emotions Can Be Dangerous** – Even a properly structured portfolio is rendered ineffective if its integrity is not maintained over time. The emotional aspects of the markets often work against investors, causing them to make poor decisions based upon feelings of fear, greed, or regret rather than upon a rational portfolio strategy. Heritage utilizes an approach that minimizes emotional pitfalls by establishing discipline at the outset and by relying on sound, scientific fundamentals to guide the process. We ignore the Wall Street media machine and instead approach portfolio management with objectivity, patience, and rationality.

**Legal and Regulatory Matters Risks** - Legal developments which may adversely impact investing and investment-related activities can occur at any time. “Legal Developments” means changes and other developments concerning foreign, as well as US federal, state and local laws and regulations, including adoption of new laws and regulations, amendment or repeal of existing laws and regulations, and changes in enforcement or interpretation of existing laws and regulations by governmental regulatory authorities and self-regulatory organizations (such as the SEC, the US Commodity Futures Trading Commission, the Internal Revenue Service, the US Federal Reserve and the Financial Industry Regulatory Authority). Our management of accounts may be adversely affected by the legal and/or regulatory consequences of transactions effected for the accounts. Accounts may also be adversely affected by changes in the enforcement or interpretation of existing statutes and rules by governmental regulatory authorities or self-regulatory organizations.

**System Failures and Reliance on Technology Risks** - Our investment strategies, operations, research, communications, risk management, and back-office systems rely on technology, including hardware, software, telecommunications, internet-based platforms, and other electronic systems. Additionally, parts of the technology used are provided by third parties and are, therefore, beyond our direct control. We seek to ensure adequate backups of hardware, software, telecommunications, internet-based platforms, and other electronic systems, when possible, but there is no guarantee that our efforts will be successful. In addition, natural disasters, power interruptions and other events may cause system failures, which will require the use of backup systems (both on- and off-site). Backup systems may not operate as well as the systems that they back-up and may fail to properly operate, especially when used for an extended period. To reduce the impact a system failure may have, we continually evaluate our backup and disaster recovery systems and perform periodic checks on the backup systems' conditions and operations. Despite our monitoring, hardware, telecommunications, or other electronic systems malfunctions may be unavoidable, and result in consequences such as the inability to trade for or monitor client accounts and portfolios. If such circumstances arise, Heritage will consider appropriate measures for clients.

**Cybersecurity Risk** - A portfolio is susceptible to operational and information security risks due to the increased use of the internet. In general, cyber incidents can result from deliberate attacks or unintentional events. Cyberattacks include, but are not limited to, infection by computer viruses or other malicious software code, gaining unauthorized access to systems, networks, or devices through "hacking" or other means for the purpose of misappropriating assets or sensitive information, corrupting data, or causing operational disruption. Cybersecurity failures or breaches by third-party service providers may cause disruptions and impact the service providers' and our business operations, potentially resulting in financial losses, the inability to transact business, violations of applicable privacy and other laws, regulatory fines, penalties, reputational damage, reimbursement, or other compensation costs, and/or additional compliance costs. While we have established business-continuity plans and risk management systems designed prevent or reduce the impact of such cyberattacks, there are inherent limitations in such plans and systems due in part to the everchanging nature of technology and cyberattack tactics.

**Pandemic Risks** - The recent outbreak of the novel coronavirus rapidly became a pandemic and has resulted in disruptions to the economies of many nations, individual companies, and the markets in general, the impact of which cannot necessarily be foreseen at the present time. This has created closed borders, quarantines, supply chain disruptions and general anxiety, negatively impacting global markets in an unforeseeable manner. The impact of the novel coronavirus and other such future infectious diseases in certain regions or countries may be greater or less due to the nature or level of their public health response or due to other factors. Health crises caused by the recent coronavirus outbreak or future infectious diseases may exacerbate other pre-existing political, social, and economic risks in certain countries. The impact of such health crises may be quick, severe and of unknowable duration. These pandemic, and other epidemics and pandemics that may arise in the future, could result in continued volatility in the financial markets and could have a negative impact on investment performance.

**Investing in securities involves a risk of loss that clients should be prepared to bear.**

### **Item 9 – Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Heritage Investment Group, Inc. or the integrity of Heritage’s management.

Heritage Investment Group, Inc. has NO information to disclose applicable to this Item.

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

Neither Heritage nor any of our management persons are registered, or have an application pending to register, as a broker-dealer, futures commission merchant, commodity pool operator, commodity trading adviser or as an associated person (or registered representative) of the foregoing entities.

In addition, neither Heritage nor any of our management persons have any arrangement that is material to our advisory business or to our clients that Heritage or any of our management persons have with any related person that is a:

- Broker-dealer, municipal securities dealer, or government securities dealer or broker,
- Investment company or other pooled investment vehicle,
- Investment Adviser or Financial Planner
- Futures commission merchant (or commodity pool operator or commodity trading advisor),
- Banking or thrift institution
- Insurance company or agency,
- Pension consultant,
- Real estate broker or dealer, or
- Sponsor or syndicator of limited partnerships.

The following related persons have a financial relationship with Heritage that may encourage them to refer clients to our firm:

Darryl L. Hinkle, Wealth Manager with Heritage, is an owner of Hinkle, Richter and Rhine, an independent accounting and consulting firm providing audit, compliance, and tax consulting services. Mr. Hinkle is a Wealth Manager at Heritage and receives ongoing compensation from Heritage for referrals of customers.

Anne B. MacLean and Frederick R. MacLean, Sr., Heritage-Advisor Representatives, were formerly associated with the law firm of MacLean & Ema P.A. Heritage's services are made available to the clients of the law firm. Anne B. MacLean and Frederick R. MacLean, Sr., receive ongoing compensation from Heritage for consulting services. In addition, Laura G. MacLean, a Trustee for two of Heritage's beneficial owners, is a member of the law firm of MacLean & Ema P.A. and married to Heritage's President, Frederick R. MacLean, Jr.

It should be noted that Heritage may recommend to you the use of legal and accounting services provided by these affiliated persons and their firms. Although this practice is helpful in the coordination of wealth management of client assets, it represents a conflict of interest in that each affiliated party benefits financially from your use of each respective service should you choose to engage them. To address this potential conflict, Heritage has developed and implement a compliance program, administered by our Chief Compliance Officer, which includes initial and periodic reviews of customer accounts to help ensure that investment objectives are being met and we are acting in your best interest.

As referenced in Item 4, HTPS acts as a corporate trust protector under a trust agreement, which was established to accommodate certain clients. Messrs. MacLean, Jr., McCarver and Taylor are the managers of HTPS. When engaged, HTPS will be selected by the grantor to represent the grantor's interests in making trust decisions in a non-fiduciary capacity. HTPS has the authority to:

- a. question and approve, in writing, the fees of any corporate trustee,
- b. remove a corporate trustee without any judicial approval,
- c. appoint a successor corporate trustee to fill any vacancy where no successor is named in the trust, but in no event shall the appointed successor be an affiliate of Heritage, and
- d. appoint a successor trust protector trustee to fill any vacancy where no successor is named in the trust.

The fiduciary responsibilities under the trust would remain with the trustee; not Heritage or HTPS. Heritage will never serve as the trustee. HTPS would not be named as the owner of any trust or fiduciary account, or otherwise hold or control any trust assets. Every trust under which HTPS will serve as a trust protector will have a named corporate trustee. The trustee will be solely responsible for all trust decisions, including preparation of fiduciary accountings to the beneficiaries, responsibility for distributions, tax preparation, the engagement of professionals, and the general administration of the trust. HTPS will not engage in trust business and is not a Florida trust company.

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

Heritage has adopted a firm wide Policy, Procedures and Code of Ethics Manual (“manual”) describing its high standard of business conduct, and fiduciary duty to you, our client. The manual includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts, and personal securities trading procedures, among other things. All supervised persons at Heritage must acknowledge the terms of the manual annually, or as amended.

Heritage anticipates that, in appropriate circumstances, consistent with your investment objectives, it will cause accounts over which Heritage has management authority to effect, and will recommend to you, our client, or prospective client, the purchase or sale of securities in which Heritage, its affiliates and/or clients, directly or indirectly, have a position of interest. Heritage’s employees and persons associated with Heritage are required to follow Heritage’s manual. Subject to satisfying its policies and applicable laws, officers, directors and employees of Heritage and its affiliates may trade for their own accounts in securities which are recommended to and/or purchased for Heritage’s clients. The manual is designed to assure that the personal securities transactions, activities, and interests of the employees of Heritage will not interfere with (1) making decisions in the best interest of advisory clients and (2) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the manual, certain classes of securities have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of Heritage’s clients. In addition, the manual requires pre-clearance of many transactions, and restricts trading in close proximity to client trading activity. Employee trading is continually monitored to reasonably prevent conflicts of interest between Heritage and its clients.

Separately, from time to time, Heritage donates to charitable organizations that are affiliated with or supported by clients. In general, such charitable donations are made in response to specific client requests. Because Heritage’s contributions may result in the potential recommendation of Heritage or its services, such contributions may raise a potential conflict of interest. As a result, Heritage’s Chief Compliance Officer reviews



requested contributions to ensure no contribution will be made so as to imply that Heritage is to benefit from the charitable contribution or require a quid pro quo arrangement.

You, our client, or prospective client, may request a copy of the firm's Code of Ethics by contacting S. Hardy Taylor, VP, CCO at (954) 785-5400.

### **Item 12 - Brokerage Practices**

Heritage does not act as a broker/dealer or qualified custodian of client assets. In light of this, Heritage strongly recommends that clients choose a large, financially strong, low-cost, independent broker/dealer-custodian, such as Charles Schwab, Fidelity, or other qualified custodian. In light of these recommendations, Heritage participates in, and has agreements with, these respective firms whereby they offer their services to Heritage clients (and other independent investment advisors). These firms offer a range of services and products which include custody of securities, trade execution, clearance, transaction settlement, tax and portfolio reporting, branch offices etc. Heritage does NOT receive any direct monetary compensation from any custodian for trade execution. However, Fidelity and Schwab each offer Heritage clients a variety of services with varying commission and fee schedules that change from time to time. The fee schedules vary between these broker/custodians so Heritage clients with accounts at different custodians will have varying costs. Depending on the circumstances, the broker/custodial costs may be higher or lower than other broker/custodians. In addition, each broker/custodian may not offer the exact same securities for trading, services, etc., so individual securities in client accounts may vary within investment programs. Heritage, at the time of client engagement, will present the services and costs of each broker/custodian firm and allow clients to select (or decline) the firm they believe best meets their specific needs. In addition, Heritage incurs direct costs from these broker/custodians that vary, and they reduce these costs when a specified asset threshold is reached. This causes a potential conflict of interest because Heritage has an incentive to recommend the broker/custodian that will waive certain costs once a specified asset level is reached. To address this conflict, Heritage will present to each client the services and costs of each broker/custodian as previously noted. As always, Heritage endeavors to do what is best for each client based on their specific needs.



Heritage maintains NO formal soft dollar arrangements with any custodian (i.e., a written agreement with a custodian/brokerage firm whereby Heritage receives a variety of services paid for by said brokerage firm). However, Heritage may receive, from various client selected brokerage firms, benefits it may not otherwise have received had there not been an association with the client. These benefits are not based on the amount of assets or transactions in corresponding client accounts. These benefits may include duplicate client confirmations, duplicate client statements, information on a variety of investment issues, electronic access to account information, access to mutual funds generally available only to institutional investors. In fulfilling our duties to you, we endeavor at all times to put your interest first. You should be aware; however, that our receipt of economic benefits from a custodian creates a conflict of interest since these benefits may influence our choice of custodian over another custodian that does not furnish similar access, systems support, or services.

In evaluating whether to recommend that client's custody their assets at a particular custodian, we take into account the availability of the foregoing products and services and other arrangements as part of the total mix of factors it considers and not solely the nature, cost or quality of custody and brokerage services provided by a custodian. As stated above, clients should be aware that the receipt of such economic benefits by us in and of itself creates a potential conflict of interest and may indirectly influence our choice of custodian for custody and brokerage services. To address these potential conflicts of interest, we have developed and implemented a Compliance Program, which includes a review of the services and execution quality we receive from each custodian.

Heritage may enter trades as a block when advantageous to clients whose accounts have a need to buy or sell shares of the same security. This method permits the trading of aggregate blocks of securities composed of assets from multiple client accounts. It allows Heritage to execute trades in a timely, equitable manner, and may reduce overall costs to clients.

Heritage will only aggregate transactions when it believes that aggregation is consistent with its duty to seek best execution (which includes the duty to seek best price) for its clients. No advisory client will be favored over any other client; each client that participates in an aggregated order will participate at the average share price for all Heritage's transactions in a given security on a given business day held at the same custodian. Transaction costs for participating accounts will be assessed at the custodian's commission rate applicable to each



account; therefore, transaction costs may vary among accounts. Accounts may be excluded from a block due to tax considerations, client direction or other factors making the account's participation ineligible or impractical.

We may also aggregate trades within household client accounts even if we are not aggregating across multiple client accounts, as discussed above. Certain affiliated accounts may trade in the same securities with your accounts on an aggregated basis when consistent with Heritage's obligation of best execution. In such circumstances, the affiliated and your accounts will receive securities at a total average price. Heritage will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. Completed orders will be allocated as specified in the initial trade order. Partially filled orders will be allocated on a pro rata basis. Any exceptions will be explained on the order.

Heritage does not routinely recommend, request, or require that you direct us to execute transactions through a specified broker-dealer. In directed brokerage arrangements, the client is responsible for negotiating the commission rates and other fees to be paid to the broker. Accordingly, a client who directs brokerage should consider whether such designation may result in certain costs or disadvantages to the client, either because the client may pay higher commissions or obtain less favorable execution, or the designation limits the investment options available to the client.

It is Heritage's policy that the firm will not affect any principal or agency cross securities transactions for client accounts. Heritage will also not cross trades between client accounts. Principal transactions are generally defined as transactions where an adviser, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to any advisory client. A principal transaction may also be deemed to have occurred if a security is crossed between an affiliated hedge fund and another client account. An agency cross transaction is defined as a transaction where a person acts as an investment adviser in relation to a transaction in which the investment adviser, or any person controlled by or under common control with the investment adviser, acts as broker for both the advisory client and for another person on the other side of the transaction.

### **Item 13 – Review of Accounts**

Reviews of your accounts will be conducted on a quarterly basis, at a minimum, by one or more of the following: President, Frederick R. MacLean, Jr.; by Vice President-CCO, Samuel Hardy Taylor; Treasurer, Robert I. McCarver; Chief Investment Officer, Timothy G. Slattery, Wealth Managers, Craig C. Chuang; Stacy Bliss; Darryl Hinkle; Erik Johnson; David K. Teas; Nicklaus Mattingly, and Jeff Realejo; and Associate Wealth Manager-Frederick R. MacLean III. There is no minimum number of accounts assigned for each reviewer. The review process contains each of the following elements:

- a. determine/review your goals and objectives,
- b. evaluate the strategy which has been employed, and
- c. monitor the portfolio.

Account reviews may be triggered by any one or more of the following events:

- a. specific requests,
- b. change in your goals and objectives, and
- c. changes in investment policy limits.

For all discretionary client accounts, Heritage will provide you a written quarterly report(s) of how your assets have performed (time weighted rates of return). We encourage you to compare the account statements you receive from your independent qualified custodian with those you receive from Heritage.

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

1) Prior to May 21, 2021, Heritage periodically received client referrals from Charles Schwab & Co., Inc. (“Schwab”) through Heritage’s participation in Schwab Advisor Network (“the Service”). The Service was designed to help investors find an independent investment advisor. Schwab is a broker-dealer independent of and unaffiliated with Heritage. Schwab does not supervise Heritage and has no responsibility for Heritage’s management of your portfolios or Heritage’s other advice or services. Currently, Heritage is no longer participating in the Service for purposes of receiving new client referrals but continues to



service existing client referrals and is obligated to pay Schwab an on-going fee (“Participation Fee”) for each successful client relationship established as a result of past referrals. This fee is usually a percentage of the advisory fee that the client pays to Heritage. Heritage’s participation in the Service had raised potential conflicts of interest described below.

Heritage continues to pay Schwab a Participation Fee on all past referred client accounts that are maintained in custody at Schwab, and (if applicable) a Non-Schwab Custody Fee on all accounts that are maintained at, or transferred to, another custodian. The Participation Fee paid by Heritage is a percentage of the fees you owe to Heritage or a percentage of the value of the assets in your account. Heritage pays Schwab the Participation Fee for so long as the referred client’s account remains in custody at Schwab. The Participation Fee is billed to Heritage quarterly and may be increased, decreased or waived by Schwab from time to time. The Participation Fee is paid by Heritage and not by you. Heritage does not charge clients referred through the Service fees or costs greater than the fees or costs Heritage charges clients with similar portfolios who were not referred through the Service. Heritage generally pays Schwab a Non-Schwab Custody Fee if custody of a referred client’s account is not maintained by, or assets in the account are transferred from Schwab. This Fee does not apply if the client was solely responsible for the decision not to maintain custody at Schwab. The Non-Schwab Custody Fee is a one-time payment equal to a percentage of the assets placed with a custodian other than Schwab. The Non-Schwab Custody Fee is higher than the Participation Fees Heritage generally would pay in a single year. Thus, for clients that were referred to Heritage via the Service, Heritage had an incentive to recommend that client accounts be held in custody at Schwab. The Participation and Non-Schwab Custody Fees are based on assets in accounts of Heritage’s clients who were referred by Schwab, and those referred clients’ family members living in the same household. Thus, Heritage had an incentive to encourage household members of clients referred through the Service to maintain custody of their accounts and execute transactions at Schwab and to instruct Schwab to debit Heritage’s fees directly from the accounts. For accounts of Heritage’s clients maintained in custody at Schwab, Schwab will not charge the client separately for custody but will receive compensation from Heritage’s clients in the form of commissions or other transaction-related compensation on securities trades executed through Schwab. Schwab also will receive a fee (generally lower than the applicable commission on trades it executes) for clearance and settlement of trades executed through broker-dealers other than Schwab. Schwab’s fees for trades executed at other broker-dealers are in addition to the other broker-

dealer fees. Thus, Heritage has an incentive to cause trades to be executed through Schwab rather than another broker-dealer. Heritage, nevertheless, acknowledges its duty to seek best execution of trades for client accounts. Trades for client accounts held in custody at Schwab may be executed through a different broker-dealer than trades for Heritage's other clients. Thus, trades for accounts custodied at Schwab may be executed at different times and different prices than trades for other accounts that are executed at other broker-dealers. In addition, Heritage periodically participates in seminars/meetings with local Schwab office representatives and their clients in which materials related to investment management services are presented. Historically, the costs of hosting such events (i.e., meals, drinks, location, etc.) have been paid for by Schwab. In the future, Heritage anticipates similar events that may be paid for in part or in whole by Heritage or its affiliates. In addition to seminars/meetings, Heritage, or its affiliates, periodically purchase meals/drinks for local Schwab representatives and/or their clients. Heritage or its affiliates also send holiday gift baskets to Schwab offices/representatives all of which may present a conflict of interest if said Schwab representative refer their clients to Heritage or its affiliates.

In addition, Heritage may manage investment portfolios for employees of Schwab. All Schwab employee managed portfolios receive no special treatment or pricing in the administration of their Heritage account(s).

2) Heritage has arrangements with non-affiliated, consultants and registered investment advisers ("promoter(s)") in which compensation may be paid by Heritage to these parties for bringing a client to Heritage. Such arrangements will comply with federal and any applicable corresponding state securities/banking law requirements. Such referral fees shall be paid solely from Heritage's management fee and shall not result in any additional charge to the client greater than the fees or costs Heritage charges its advisory clients who were not introduced by the promoter and have similar portfolios under management with Heritage. When a client is introduced to Heritage by an unaffiliated promoter, the promoter shall disclose the nature of the promoter's relationship, and shall provide each prospective client with a copy of Heritage's written brochure as required, together with a copy of a separate written disclosure statement from the promoter to the client disclosing the terms of the arrangement between Heritage and the promoter, including the compensation to be received by the promoter from Heritage.



One of our arrangements described above, is with Zoe Financial, Inc., through their Zoe Advisor Network (ZAN). Zoe Financial, Inc. is independent of and unaffiliated with Heritage and there is no employee relationship between them. Zoe Financial established the Zoe Advisor Network as a means of referring individuals and other investors seeking fee-only personal investment management services or financial planning services to independent investment advisors. Heritage pays Zoe Financial an on-going fee for each successful client referral. This fee is usually a percentage of the advisory fee that the client pays to Heritage (“Referral Fee”). Heritage will not charge clients referred through the Zoe Advisor Network any fees or costs higher than its standard fee schedule offered to its clients. For information regarding additional or other fees paid directly or indirectly to Zoe Financial Inc., please refer to the Zoe Financial Disclosure and Acknowledgement Form (if applicable).

### **Item 15 – Custody**

To diminish the possibility of fraud, Heritage does not act as a qualified custodian for your assets. All client accounts are held at an independent brokerage firm, custodian, or bank that provides a separate monthly or quarterly accounting directly to you, the client, or your independent representative. In addition to the above, the following custody related items should be noted:

#### **Custody -Not Subject to Exam:**

To assist clients with their desired disbursement of funds held at their respective custodian(s), Heritage clients (in many instances) have provided Heritage the standing written authority to move client funds to an account or party of the client’s specific designation (custody of assets-not subject to exam). In order to facilitate this common desire by clients for assistance with these disbursements, Heritage (and the respective client qualified custodians) has adopted seven-step criteria to minimize the possibility of fund misappropriation. These steps include 1) the client providing written instruction to the custodian that includes the client signature, receiving third party’s name with address or account number; 2) the client (to the custodian) specifically authorizing Heritage in writing to direct these transfers; 3) the client’s custodian performs an appropriate verification and provides notice of transfer to the client promptly after each transfer; 4) the client may change or terminate this authorization with the custodian at any time; 5) Heritage has no authority

to modify the receiving party information; 6) Heritage maintains records showing that Heritage or a related party to Heritage is not the recipient; and 7) the client's custodian sends an initial notice to the client confirming the instructions as well as an annual notice to reconfirm the instruction.

### **Custody Subject to Exam:**

In a limited number of instances, and under a specific written request or appointment, a member of Heritage may act as a Trustee, Trust Protector, Executor, Personal Representative or Guardian for specific client accounts. In these instances, (where Heritage is deemed to have custody of assets subject to exam), safeguards have been implemented to ensure that an independent representative of each account(s) is able to independently monitor the account(s) activity on a regular basis. In addition, on an annual basis, these accounts are subject to a random, surprise examination by an independent certified public accountant. The results of these surprise annual examinations can be found on the SEC website.

### **Advisory Fees:**

Furthermore, as part of our billing process for certain clients, the custodian is advised of the amount of the fee to be deducted from that client's account, and the custodian is authorized to pay Heritage its fee directly. As a result, you should receive at least quarterly statements from the independent broker-dealer, bank, or other qualified custodian that holds and maintains your investment assets. Heritage urges you to carefully review such statements and compare such official custodial records to the account statements that we may provide to you. Our supplemental statements may vary from the qualified custodial statements based on accounting procedures, reporting dates, valuation methodologies or other differences in reporting of certain securities.

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

Heritage receives written discretionary authority from the client at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account. When selecting securities, and

determining amounts, Heritage observes the investment policies, limitations, and restrictions (as amended from time to time) of the clients for which it advises. It should be noted that in certain instances where Heritage deems that best execution of a trade may be obtained from a party other than your designated broker/custodian, you authorize Heritage to execute a trade with that 3<sup>rd</sup> party. However, to ensure the safety of your assets, settlement of all trades will occur inside your respective qualified custodial account.

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

To avoid material conflicts between Heritage and you, Heritage Investment Group, Inc. is precluded from voting proxy materials on your behalf. You, our client, retain the responsibility for receiving and voting proxies for any and all securities maintained in your portfolio(s). However, if asked, Heritage may provide general information regarding the voting of proxies.

Separately, although not involved directly, it is further noted that Heritage, upon client request, may assist clients with the preparation and submission of historical data needed in the filing of class action claims.

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

Heritage Investment Group, Inc. is not required in this Item to provide you with certain financial information or disclosures about Heritage’s financial condition because:

- Heritage has NO financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients and has NOT at any time during the past ten years been the subject of a bankruptcy proceeding.
- We do not require or solicit prepayment of client fees of more than \$1,200 per client and six months or more in advance.

## **Item 19 – Privacy Statement**

Heritage Investment Group, Inc., an independent Registered Investment Adviser, is committed to safeguarding the confidential information of its clients. We hold all personal information provided to our firm in the strictest confidence. These records include all personal information that we collect from you in connection with any of the services provided by Heritage Investment Group, Inc. We do not disclose information to nonaffiliated third parties, except as permitted by law, and do not anticipate doing so in the future. If we were to anticipate such a change in firm policy, we would be prohibited under the law from doing so without advising you first. As you know, we use health and financial information that you provide to us to help you meet your personal financial goals while guarding against any real or perceived infringements of your rights of privacy. Our policy with respect to personal information about you is listed below.

- We limit employee and agent access to information only to those who have a business or professional reason for knowing, and only to nonaffiliated parties as permitted by law. (For example, federal regulations permit us to share a limited amount of information about you with a brokerage firm in order to execute securities transactions on your behalf, or so that our firm can discuss your financial situation with your accountant or lawyer.)
- We maintain a secure office and computer environment to ensure that your information is not placed at unreasonable risk.
- The categories of nonpublic personal information that we collect from a client depend upon the scope of the client engagement. It will include information about your personal finances, information about your health to the extent that it is needed for the planning process, information about transactions between you and third parties, and information from consumer reporting agencies.
- For unaffiliated third parties that require access to your personal information, including financial service companies, consultants, and auditors, we also require strict confidentiality in our agreements with them and expect them to keep this information private. Federal and State regulators also may review firm records as permitted under law.



- We do not provide your personally identifiable information to mailing list vendors or solicitors for any purpose.
- Personal identifiable information about you will be maintained during the time you are a client, and for the required time thereafter that such records are required to be maintained by federal and state securities laws. After this required period of record retention, all such information will be destroyed.

If you have questions about this Privacy Statement, please email our office at [htaylor@heritageinvestment.com](mailto:htaylor@heritageinvestment.com) or call 1-800-684-9139.

**ADV PART 2B-Supplements**  
**09/12/2023**



**Item 1- Cover Page**

**Frederick Richards MacLean, Jr., CFA, CFP®**

**Heritage Investment Group, Inc.**

**2480 NE 23<sup>rd</sup> Street Pompano Beach, FL 33062**

**(954)-785-5400**

**09/12/2023**

**This brochure supplement provides information about Frederick R. MacLean, Jr. that supplements the Heritage Investment Group, Inc. (“Heritage”) brochure (“brochure”). You should have received a copy of that brochure. Please contact S. Hardy Taylor, VP, CCO at (954) 785-5400 if you did not receive Heritage’s brochure or if you have any questions about the contents of this supplement.**

**Additional information about Frederick R. MacLean, Jr. is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

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

**Frederick R. MacLean, Jr., CFA, CFP®, CRD no. 4409805**

**Year of Birth-1968**

**EDUCATION:**

**Master of Business Administration (MBA)-Florida Atlantic University (1994)**

**Bachelor of Arts (BA)-Political Science, Washington College (1991)**

**EMPLOYMENT:**

**President-Heritage Investment Group, Inc. (1993 to Present)**

**PROFESSIONAL DESIGNATIONS:**

**Chartered Financial Analyst (1999)**

**Certified Financial Planner (1996)**

## PROFESSIONAL DESIGNATION DISCLOSURES:

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 90,000 CFA charter holders working in 134 countries. To earn the CFA charter, candidates must: 1) pass three sequential, six-hour examinations; 2) have at least four years of qualified professional investment experience; 3) join CFA Institute as members; and 4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct. 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.

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 charter holders—often making the charter a prerequisite for employment. Additionally, regulatory bodies in 22 countries and territories recognize the CFA charter as a proxy for meeting certain licensing requirements, and more than 125 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses. 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. To learn more about the CFA charter, visit [www.cfainstitute.org](http://www.cfainstitute.org).

I am certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”). Therefore, I may refer to myself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and I may use these and CFP Board’s other certification marks (the “CFP Board Certification Marks”). CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold CFP® certification. You may find more information about CFP® certification at [www.cfp.net](http://www.cfp.net).

CFP® professionals have met CFP Board’s high standards for education, examination, experience, and ethics. To become a CFP® professional, an individual must fulfill the following requirements:

- **Education** – Earn a bachelor’s degree from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirement through other qualifying credentials.
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual’s ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.
- **Experience** – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
- **Ethics** – Satisfy the *Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement* and agree to be bound by CFP Board’s *Code of Ethics and Standards of Conduct* (“Code and Standards”), which sets forth the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements to remain certified and maintain the right to continue to use the CFP Board Certification Marks:

- **Ethics** – Commit to complying with CFP Board’s *Code and Standards*. This includes a commitment to CFP Board, as part of the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial advice and financial planning. CFP Board may sanction a CFP® professional who does not abide by this commitment, but CFP Board does not guarantee a CFP® professional’s services. A client who seeks a similar commitment should obtain a written engagement that includes a fiduciary obligation to the client.
- **Continuing Education** – Complete 30 hours of continuing education hours every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the *Code and Standards*.

### **Item 3- Disciplinary Information**

Heritage Investment Group is required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice.

NO disclosure information is applicable to this Item.

### **Item 4- Other Investment Related Business Activities**

NONE

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

NONE

### **Item 6- Supervision**

Heritage Investment Group, Inc. has adopted, and periodically updates, a compliance manual that outlines for each employee the various rules and regulations they are required to adhere to. Heritage has appointed a Chief Compliance Officer who reviews and monitors employee activity with respect to the rules and regulations. In addition, Heritage has adopted a Code of Ethics that requires each employee to act in the client’s best interest at all times. Should



you have questions related to these activities, please contact S. Hardy Taylor, VP, CCO at (954) 785-5400.

**Item 7- Requirements for State-Registered Advisers**

Heritage is an SEC Registered Investment Adviser; therefore, this section is not applicable.



**Item 1- Cover Page**

**Timothy Glenn Slattery**

**Heritage Investment Group, Inc.**

2480 NE 23<sup>rd</sup> Street, Pompano Beach, FL 33062

954-785-5400

09/12/2023

**This brochure supplement provides information about Timothy G. Slattery that supplements the Heritage Investment Group, Inc. (“Heritage”) brochure (“brochure”). You should have received a copy of that brochure. Please contact S. Hardy Taylor, VP, CCO at (954) 785-5400 if you did not receive Heritage’s brochure or if you have any questions about the contents of this supplement.**

**Additional information about Timothy G. Slattery is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

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

**Timothy Glenn Slattery, CRD no. 2322112**

Year of Birth-1969

**EDUCATION:**

Doctor of Philosophy (Ph.D.)-University of South Florida (2014)

Master of Business Administration (MBA)-University of Chicago (1996)

Bachelor of Science (BS)-Finance, University of Florida (1991)

**EMPLOYMENT:**

Chief Investment Officer-Heritage Investment Group, Inc. (2004 to Present)

**PROFESSIONAL DESIGNATIONS:**

N/A

### **Item 3- Disciplinary Information**

Registered Investment Advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice.

NO information is applicable to this Item.

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

NONE

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

NONE

### **Item 6- Supervision**

Heritage Investment Group, Inc. has adopted, and periodically updates, a compliance manual that outlines for each employee the various rules and regulations they are required to adhere to. Heritage has appointed a Chief Compliance Officer who reviews and monitors employee activity with respect to the rules and regulations. In addition, Heritage has adopted a Code of Ethics that requires each employee to act in the client's best interest at all times. Should you have questions related to these activities, please contact S. Hardy Taylor, VP, CCO or Frederick R. MacLean, Jr. at (954) 785-5400.

### **Item 7- Requirements for State-Registered Advisers**

Heritage is an SEC Registered Investment Adviser; therefore, this section is not applicable.



**Item 1- Cover Page**

**Samuel Hardy Taylor**

**Heritage Investment Group, Inc.**

2480 NE 23<sup>rd</sup> Street, Pompano Beach, FL 33062

954-785-5400

09/12/2023

**This brochure supplement provides information about Samuel Hardy Taylor that supplements the Heritage Investment Group, Inc. (“Heritage”) brochure (“brochure”). You should have received a copy of that brochure. Please contact Samuel Hardy Taylor, VP, CCO at (954) 785-5400 if you did not receive Heritage’s brochure or if you have any questions about the contents of this supplement.**

**Additional information about Samuel Hardy Taylor is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

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

**Samuel Hardy Taylor, CIMA, CIMC, CRD no. 2455461**

Year of Birth-1968

**EDUCATION:**

Master of Business Administration (MBA)-Florida Atlantic University (1998)

Bachelor of Arts (BA)-Political Science, Washington College (1991)

**EMPLOYMENT:**

Vice President/Chief Compliance Officer-Heritage Investment Group, Inc. (1993 to Present)

**PROFESSIONAL DESIGNATIONS:**

Certified Investment Management Analyst (2004)

Certified Investment Management Consultant (1997)

## PROFESSIONAL DESIGNATION DISCLOSURES

### **Certified Investment Management Analyst (CIMA)**

The CIMA certification signifies that an individual has met initial and on-going experience, ethical, education, and examination requirements for investment management consulting, including advanced investment management theory and application. Prerequisites for the CIMA certification are three years of financial services experience and an acceptable regulatory history. To obtain the CIMA certification, candidates must pass an online Qualification Examination, successfully complete a one-week classroom education program provided by a Registered Education Provider at an AACSB accredited university business school and pass an online Certification Examination. CIMA designees are required to adhere to IMCA's Code of Professional Responsibility, Standards of Practice, and Rules and Guidelines for Use of the Marks. CIMA designees must report 40 hours of continuing education credits, including two ethics hours, every two years to maintain the certification. The designation is administered through Investment Management Consultants Association (IMCA).

### **Certified Investment Management Consultant (CIMC)**

As of December 2003, new CIMC certifications are no longer granted. When the designation was issued, its content focused on investment consulting. Current CIMC designees can maintain the designation through Investment Management Consultants Association (IMCA). CIMC designees are required to adhere to IMCA's Code of Professional Responsibility, Standards of Practice, and Rules and Guidelines for Use of the Marks. CIMC designees must report 40 hours of continuing education credits, including two ethics hours, every two years to maintain the designation.

### **Item 3- Disciplinary Information**

Registered Investment Advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice.

NO information is applicable to this Item.

### **Item 4- Other Investment Related Business Activities**

NONE

**Item 5- Additional Compensation**

NONE

**Item 6- Supervision**

Heritage Investment Group, Inc. has adopted, and periodically updates, a compliance manual that outlines for each employee the various rules and regulations they are required to adhere to. Heritage has appointed a Chief Compliance Officer who reviews and monitors employee activity with respect to the rules and regulations. In addition, Heritage has adopted a Code of Ethics that requires each employee to act in the client's best interest at all times. Should you have questions related to these activities, please contact S. Hardy Taylor, VP, CCO or Frederick R. MacLean, Jr. at (954) 785-5400.

**Item 7- Requirements for State-Registered Advisers**

Heritage is an SEC Registered Investment Adviser; therefore, this section is not applicable.



**Item 1- Cover Page**

**Craig Chih-Hsin Chuang, CFA, CFP®**

**Heritage Investment Group, Inc.**

2480 NE 23<sup>rd</sup> Street Pompano Beach, FL 33062

(954)-785-5400

09/12/2023

**This brochure supplement provides information about Craig C. Chuang that supplements the Heritage Investment Group, Inc. (“Heritage”) brochure (“brochure”). You should have received a copy of that brochure. Please contact S. Hardy Taylor, VP, CCO at (954) 785-5400 if you did not receive Heritage’s brochure or if you have any questions about the contents of this supplement.**

**Additional information about Craig C. Chuang is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

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

**Craig C. Chuang, CFA, CFP®, CRD no. 2782275**

Year of Birth-1974

**EDUCATION:**

Bachelor of Business Administration (BBA)-Florida Atlantic University (1997)

**EMPLOYMENT:**

Advisor Representative-Heritage Investment Group, Inc. (2006 to Present)

**PROFESSIONAL DESIGNATIONS:**

Chartered Financial Analyst (2010)

Certified Financial Planner (2014)

## PROFESSIONAL DESIGNATION DISCLOSURES:

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 90,000 CFA charter holders working in 134 countries. To earn the CFA charter, candidates must: 1) pass three sequential, six-hour examinations; 2) have at least four years of qualified professional investment experience; 3) join CFA Institute as members; and 4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct. 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

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 charter holders—often making the charter a prerequisite for employment. Additionally, regulatory bodies in 22 countries and territories recognize the CFA charter as a proxy for meeting certain licensing requirements, and more than 125 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses. 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. To learn more about the CFA charter, visit [www.cfainstitute.org](http://www.cfainstitute.org).

I am certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”). Therefore, I may refer to myself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and I may use these and CFP Board’s other certification marks (the “CFP Board Certification Marks”). CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold CFP® certification. You may find more information about CFP® certification at [www.cfp.net](http://www.cfp.net).

CFP® professionals have met CFP Board’s high standards for education, examination, experience, and ethics. To become a CFP® professional, an individual must fulfill the following requirements:

- **Education** – Earn a bachelor’s degree from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirement through other qualifying credentials.
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual’s ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.
- **Experience** – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
- **Ethics** – Satisfy the *Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement* and agree to be bound by CFP Board’s *Code of Ethics and Standards of Conduct (“Code and Standards”)*, which sets forth the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements to remain certified and maintain the right to continue to use the CFP Board Certification Marks:

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- **Continuing Education** – Complete 30 hours of continuing education hours every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the *Code and Standards*.

### **Item 3- Disciplinary Information**

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NO disclosure information is applicable to this Item.

### **Item 4- Other Investment Related Business Activities**

NONE

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

NONE

### **Item 6 - Supervision**

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**Item 7- Requirements for State-Registered Advisers**

Heritage is an SEC Registered Investment Adviser; therefore, this section is not applicable.



**Item 1- Cover Page**

David Kenneth Teas, CFA, CFP®

Heritage Investment Group, Inc.

2480 NE 23<sup>rd</sup> Street Pompano Beach, FL 33062

(954)-785-5400

09/12/2023

**This brochure supplement provides information about David Kenneth Teas that supplements the Heritage Investment Group, Inc. (“Heritage”) brochure (“brochure”). You should have received a copy of that brochure. Please contact S. Hardy Taylor, VP, CCO at (954) 785-5400 if you did not receive Heritage’s brochure or if you have any questions about the contents of this supplement.**

**Additional information about David Kenneth Teas is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

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

**David Kenneth Teas, CFA, CFP®, CRD no. 6037772**

Year of Birth-1980

**EDUCATION:**

Bachelor of Science (BS)-Finance, Iowa State University (2002)

**EMPLOYMENT:**

Advisory Representative-Heritage Investment Group, Inc. (2011 to Present)

**PROFESSIONAL DESIGNATIONS:**

Chartered Financial Analyst (2010)

Certified Financial Planner (2011)

#### PROFESSIONAL DESIGNATION DISCLOSURES:

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

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- **Ethics** – Satisfy the *Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement* and agree to be bound by CFP Board’s *Code*

*of Ethics and Standards of Conduct (“Code and Standards”), which sets forth the ethical and practice standards for CFP® professionals.*

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- **Continuing Education** – Complete 30 hours of continuing education hours every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the *Code and Standards*.

### **Item 3- Disciplinary Information**

Heritage Investment Group, Inc. is required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice.

NO disclosure information is applicable to this Item.

### **Item 4- Other Investment Related Business Activities**

NONE

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

NONE

### **Item 6- Supervision**

Heritage Investment Group, Inc. has adopted, and periodically updates, a compliance manual that outlines for each employee the various rules and regulations they are required to adhere to. Heritage has appointed a Chief Compliance Officer who reviews and monitors employee activity with respect to the rules and regulations. In addition, Heritage has adopted a Code



of Ethics that requires each employee to act in the client’s best interest at all times. Should you have questions related to these activities, please contact S. Hardy Taylor, VP, CCO at (954) 785-5400.

**Item 7- Requirements for State-Registered Advisers**

Heritage is an SEC Registered Investment Adviser; therefore, this section is not applicable.



**Item 1- Cover Page**

Stacy Lee Bliss

Heritage Investment Group, Inc.

2480 NE 23<sup>rd</sup> Street Pompano Beach, FL 33062

(954)-785-5400

09/12/2023

**This brochure supplement provides information about Stacy L. Bliss that supplements the Heritage Investment Group, Inc. (“Heritage”) brochure (“brochure”). You should have received a copy of that brochure. Please contact S. Hardy Taylor, VP, CCO at (954) 785-5400 if you did not receive Heritage’s brochure or if you have any questions about the contents of this supplement.**

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

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

**Stacy L. Bliss, CRD no. 2069245**

Year of Birth-1961

EDUCATION:

N/A

EMPLOYMENT:

Advisor Representative-Heritage Investment Group, Inc. (2006 to Present)

PROFESSIONAL DESIGNATIONS:

N/A

### **Item 3- Disciplinary Information**

Heritage Investment Group, Inc. is required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice.

NO disclosure information is applicable to this Item.

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

NONE

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

NONE

### **Item 6- Supervision**

Heritage Investment Group, Inc. has adopted, and periodically updates, a compliance manual that outlines for each employee the various rules and regulations they are required to adhere to. Heritage has appointed a Chief Compliance Officer who reviews and monitors employee activity with respect to the rules and regulations. In addition, Heritage has adopted a Code of Ethics that requires each employee to act in the client's best interest at all times. Should you have questions related to these activities, please contact S. Hardy Taylor, VP, CCO or Frederick R. MacLean, Jr. at (954) 785-5400.

### **Item 7- Requirements for State-Registered Advisers**

Heritage is an SEC Registered Investment Adviser; therefore, this section is not applicable.



**Item 1- Cover Page**

**Robert Ian McCarver**

**Heritage Investment Group, Inc.**

2480 NE 23<sup>rd</sup> Street, Pompano Beach, FL 33062

954-785-5400

09/12/2023

**This brochure supplement provides information about Robert Ian McCarver that supplements the Heritage Investment Group, Inc. (“Heritage”) brochure (“brochure”). You should have received a copy of that brochure. Please contact S. Hardy Taylor, VP, CCO at (954) 785-5400 if you did not receive Heritage’s brochure or if you have any questions about the contents of this supplement.**

**Additional information about Robert Ian McCarver is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

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

**Robert Ian McCarver, CRD no. 2484388**

Year of Birth-1970

**EDUCATION:**

Bachelor of Science (BS)-Sociology, Florida State University (1993)

Business Administration (AA)-Broward Community College (1991)

**EMPLOYMENT:**

Secretary/Treasurer-Heritage Investment Group, Inc. (1994 to Present)

**PROFESSIONAL DESIGNATIONS:**

N/A

**Item 3- Disciplinary Information**

Registered Investment Advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice.

NO information is applicable to this Item.

**Item 4- Other Investment Related Business Activities**

NONE

**Item 5- Additional Compensation**

NONE

**Item 6- Supervision**

Heritage Investment Group, Inc. has adopted, and periodically updates, a compliance manual that outlines for each employee the various rules and regulations they are required to adhere to. Heritage has appointed a Chief Compliance Officer who reviews and monitors employee activity with respect to the rules and regulations. In addition, Heritage has adopted a Code of Ethics that requires each employee to act in the client's best interest at all times. Should you have questions related to these activities, please contact S. Hardy Taylor, VP, CCO or Frederick R. MacLean, Jr. at (954) 785-5400.

**Item 7- Requirements for State-Registered Advisers**

Heritage is an SEC Registered Investment Adviser; therefore, this section is not applicable.



**Item 1- Cover Page**

Frederick Richards MacLean, Sr.

Heritage Investment Group, Inc.

2480 NE 23<sup>rd</sup> Street Pompano Beach, FL 33062

(954)-785-5400

09/12/2023

**This brochure supplement provides information about Frederick R. MacLean, Sr. that supplements the Heritage Investment Group, Inc. (“Heritage”) brochure (“brochure”). You should have received a copy of that brochure. Please contact S. Hardy Taylor, VP, CCO at (954) 785-5400 if you did not receive Heritage’s brochure or if you have any questions about the contents of this supplement.**

**Additional information about Frederick R. MacLean, Sr. is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

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

**Frederick R. MacLean, Sr., CRD no. 316284**

Year of Birth-1940

**EDUCATION:**

Juris Doctor (JD) Cum Laude - University of Miami-Law School (1974)

Bachelor of Science (BS)-Political Science, Johns Hopkins University (1964)

**EMPLOYMENT:**

Advisor Representative-Heritage Investment Group, Inc. (1993 to Present)

Partner- Law Firm of MacLean & Ema P.A. (1990 to 2021)-Retired



PROFESSIONAL DESIGNATIONS:

NONE

### **Item 3- Disciplinary Information**

Heritage Investment Group, Inc. is required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice.

NO disclosure information is applicable to this Item.

### **Item 4- Other Investment Related Business Activities**

NONE

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

NONE

### **Item 6- Supervision**

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### **Item 7- Requirements for State-Registered Advisers**

Heritage is an SEC Registered Investment Adviser; therefore, this section is not applicable.



**Item 1- Cover Page**

Anne Beard MacLean

Heritage Investment Group, Inc.

2480 NE 23<sup>rd</sup> Street Pompano Beach, FL 33062

(954)-785-5400

09/12/2023

**This brochure supplement provides information about Anne B. MacLean. That supplements the Heritage Investment Group, Inc. (“Heritage”) brochure. You should have received a copy of that brochure (“brochure”). Please contact S. Hardy Taylor, VP, CCO at (954) 785-5400 if you did not receive Heritage’s brochure or if you have any questions about the contents of this supplement.**

**Additional information about Anne B. MacLean is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

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

**Anne Beard MacLean, CRD no. 2484394**

Year of Birth -1943

**EDUCATION:**

Juris Doctor (JD)- Nova University-Law School (1982)

Bachelor of Arts (BA)-History- Florida Atlantic University (1974)

**EMPLOYMENT:**

Advisor Representative-Heritage Investment Group, Inc. (1993 to Present)

Partner- Law Firm of MacLean & Ema P.A. (1990 to 2021)-Retired

PROFESSIONAL DESIGNATIONS:

NONE

**Item 3- Disciplinary Information**

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**Item 4- Other Investment Related Business Activities**

NONE

**Item 5- Additional Compensation**

NONE

**Item 6- Supervision**

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**Item 1- Cover Page**

**Darryl Lee Hinkle, CPA, CFP®**

**Heritage Investment Group, Inc.**

**2480 NE 23<sup>rd</sup> Street, Pompano Beach, FL 33062**

**954-785-5400**

**09/12/2023**

**This brochure supplement provides information about Darryl L. Hinkle that supplements the Heritage Investment Group (“Heritage”) brochure (“brochure”). You should have received a copy of that brochure. Please contact S. Hardy Taylor, VP, CCO at (954) 785-5400 if you did not receive Heritage’s brochure or if you have any questions about the contents of this supplement.**

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

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

**Darryl Lee Hinkle, CPA, CFP®, CRD no. 2748641**

**Year of Birth-1944**

**EDUCATION:**

**College For Financial Planning (1987)**

**Bachelor of Science (BS)-Accounting-Florida Atlantic University (1969)**

**EMPLOYMENT:**

**Advisor Representative-Heritage Investment Group, Inc. (2000 to Present)**

**Partner-Hinkle, Richter & Rhine, LLP CPA (1979 to Present)**

PROFESSIONAL DESIGNATIONS:

Certified Public Accountant  
Certified Financial Planner (1987)

PROFESSIONAL DESIGNATION DISCLOSURES:

Certified Public Accountant (CPA) 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.

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NONE

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**Item 1- Cover Page**

Erik Olin Johnson

Heritage Investment Group, Inc.

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(954)-785-5400

09/12/2023

**This brochure supplement provides information about Erik O. Johnson that supplements the Heritage Investment Group, Inc. (“Heritage”) brochure (“brochure”). You should have received a copy of that brochure. Please contact S. Hardy Taylor, VP, CCO at (954) 785-5400 if you did not receive Heritage’s brochure or if you have any questions about the contents of this supplement.**

**Additional information about Erik O. Johnson is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

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

**Erik O. Johnson, CRD no. 3223189**

Year of Birth-1970

**EDUCATION:**

Bachelor of Business Administration (BBA)-University of Akron

**EMPLOYMENT:**

Advisor Representative-Heritage Investment Group, Inc. (4/2011 to Present)

**PROFESSIONAL DESIGNATIONS:**

N/A

**Item 3- Disciplinary Information**

Heritage Investment Group, Inc. is required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice.

NO disclosure information is applicable to this Item.

**Item 4- Other Investment Related Business Activities**

NONE

**Item 5- Additional Compensation**

NONE

**Item 6- Supervision**

Heritage Investment Group, Inc. has adopted, and periodically updates, a compliance manual that outlines for each employee the various rules and regulations they are required to adhere to. Heritage has appointed a Chief Compliance Officer who reviews and monitors employee activity with respect to the rules and regulations. In addition, Heritage has adopted a Code of Ethics that requires each employee to act in the client's best interest at all times. Should you have questions related to these activities, please contact S. Hardy Taylor, VP, CCO or Frederick R. MacLean, Jr. at (954) 785-5400.

**Item 7- Requirements for State-Registered Advisers**

Heritage is an SEC Registered Investment Adviser; therefore, this section is not applicable.



**Item 1- Cover Page**

Nicklaus Brandon Mattingly, CFP®

Heritage Investment Group, Inc.

2480 NE 23<sup>rd</sup> Street Pompano Beach, FL 33062

(954)-785-5400

09/12/2023

**This brochure supplement provides information about Nicklaus Brandon Mattingly that supplements the Heritage Investment Group, Inc. (“Heritage”) brochure (“brochure”). You should have received a copy of that brochure. Please contact S. Hardy Taylor, VP, CCO at (954) 785-5400 if you did not receive Heritage’s brochure or if you have any questions about the contents of this supplement.**

**Additional information about Nicklaus Brandon Mattingly is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

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

**Nicklaus Brandon Mattingly, CFP®, CRD no. 5940782**

Year of Birth-1986

**EDUCATION:**

Master of Science in Accountancy-University of Notre Dame (2010)

Bachelor of Science-Business Administration-Indiana University (2009)

**EMPLOYMENT:**

Advisory Representative-Heritage Investment Group, Inc. (04/2014 to Present)

**PROFESSIONAL DESIGNATIONS:**

Certified Financial Planner (2016)

PROFESSIONAL DESIGNATION DISCLOSURES:

I am certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”). Therefore, I may refer to myself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and I may use these and CFP Board’s other certification marks (the “CFP Board Certification Marks”). CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold CFP® certification. You may find more information about CFP® certification at [www.cfp.net](http://www.cfp.net).

CFP® professionals have met CFP Board’s high standards for education, examination, experience, and ethics. To become a CFP® professional, an individual must fulfill the following requirements:

- **Education** – Earn a bachelor’s degree from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirement through other qualifying credentials.
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual’s ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.
- **Experience** – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
- **Ethics** – Satisfy the *Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement* and agree to be bound by CFP Board’s *Code of Ethics and Standards of Conduct* (“Code and Standards”), which sets forth the ethical and practice standards for CFP® professionals.

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- **Continuing Education** – Complete 30 hours of continuing education hours every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the *Code and Standards*.

### **Item 3- Disciplinary Information**

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NO disclosure information is applicable to this Item.

### **Item 4- Other Investment Related Business Activities**

NONE

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

NONE

### **Item 6- Supervision**

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of Ethics that requires each employee to act in the client’s best interest at all times. Should you have questions related to these activities, please contact S. Hardy Taylor, VP, CCO or Frederick R. MacLean, Jr. at (954) 785-5400.

**Item 7- Requirements for State-Registered Advisers**

Heritage is an SEC Registered Investment Adviser; therefore, this section is not applicable.



**Item 1- Cover Page**

Jeff D. Realejo, CFP®

Heritage Investment Group, Inc.

2480 NE 23<sup>rd</sup> Street Pompano Beach, FL 33062

(954)-785-5400

09/12/2023

**This brochure supplement provides information about Jeff D. Realejo that supplements the Heritage Investment Group, Inc. (“Heritage”) brochure (“brochure”). You should have received a copy of that brochure. Please contact S. Hardy Taylor, VP, CCO at (954) 785-5400 if you did not receive Heritage’s brochure or if you have any questions about the contents of this supplement.**

**Additional information about Jeff D. Realejo is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

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

**Jeff D. Realejo, CFP®, CRD no. 6364642**

Year of Birth-1993

**EDUCATION:**

Bachelor of Science-Finance-University of Rhode Island (2015)

**EMPLOYMENT:**

Advisory Representative-Heritage Investment Group, Inc. (10/2017 to Present)

Associate Financial Advisor-Tobias Financial Advisors, Inc. (08/2016 to 08/2017)

**PROFESSIONAL DESIGNATIONS:**

Certified Financial Planner (2017)

#### PROFESSIONAL DESIGNATION DISCLOSURES:

I am certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”). Therefore, I may refer to myself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and I may use these and CFP Board’s other certification marks (the “CFP Board Certification Marks”). CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold CFP® certification. You may find more information about CFP® certification at [www.cfp.net](http://www.cfp.net).

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- **Experience** – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
- **Ethics** – Satisfy the *Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement* and agree to be bound by CFP Board’s *Code of Ethics and Standards of Conduct (“Code and Standards”)*, which sets forth the ethical and practice standards for CFP® professionals.

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- **Ethics** – Commit to complying with CFP Board’s *Code and Standards*. This includes a commitment to CFP Board, as part of the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial advice and financial planning. CFP Board may sanction a CFP® professional who does not abide by this commitment, but CFP Board does not guarantee a CFP® professional’s services. A client who seeks a similar commitment should obtain a written engagement that includes a fiduciary obligation to the client.
- **Continuing Education** – Complete 30 hours of continuing education hours every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the *Code and Standards*.

### **Item 3- Disciplinary Information**

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NO disclosure information is applicable to this Item.

### **Item 4- Other Investment Related Business Activities**

NONE

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

NONE

### **Item 6- Supervision**

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**Item 7- Requirements for State-Registered Advisers**

Heritage is an SEC Registered Investment Adviser; therefore, this section is not applicable.



**Item 1- Cover Page**

**Joseph Anthony Gitto, Jr., CFP®**

**Heritage Investment Group, Inc.**

2480 NE 23<sup>rd</sup> Street Pompano Beach, FL 33062

(954)-785-5400

09/12/2023

**This brochure supplement provides information about Joseph Anthony Gitto, Jr. that supplements the Heritage Investment Group, Inc. (“Heritage”) brochure (“brochure”). You should have received a copy of that brochure. Please contact S. Hardy Taylor, VP, CCO at (954) 785-5400 if you did not receive Heritage’s brochure or if you have any questions about the contents of this supplement.**

**Additional information about Joseph Anthony Gitto, Jr. is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

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

**Joseph Anthony Gitto, CFP®, CRD no. 7085597**

Year of Birth-1963

**EDUCATION:**

Bachelor of Science-Accounting-Baruch College (1990)

**EMPLOYMENT:**

Advisor Representative-Heritage Investment Group, Inc. (4/2019 to Present)

Owner-Central Florida Home Health Services, Inc. (10/2011 to Present)

Owner-Blue Sky Coaching and Consulting, LLC dba Blue Sky Exit Planning (10/2007 to Present)

Partner/CFO-Life Audit Professionals (05/2015 to 07/2017)

VP-Business Development-Management Planning, Inc. (09/2007 to 05/2015)

PROFESSIONAL DESIGNATIONS:  
Certified Financial Planner (2021)

PROFESSIONAL DESIGNATION DISCLOSURES:

I am certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”). Therefore, I may refer to myself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and I may use these and CFP Board’s other certification marks (the “CFP Board Certification Marks”). CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold CFP® certification. You may find more information about CFP® certification at [www.cfp.net](http://www.cfp.net).

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- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual’s ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.
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- **Ethics** – Satisfy the *Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement* and agree to be bound by CFP Board’s *Code*

*of Ethics and Standards of Conduct (“Code and Standards”), which sets forth the ethical and practice standards for CFP® professionals.*

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- **Continuing Education** – Complete 30 hours of continuing education hours every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the *Code and Standards*.

#### Certified Senior Advisor (CSA)® (2018)

The Certified Senior Advisor (CSA)® is a certification for professionals serving older adults, and is a designation awarded to qualified individuals. Earning the CSA certification requires individuals to pass a rigorous exam and to uphold the highest ethical standards for the benefit and protection of the health and welfare of seniors. CSAs are multidisciplinary professionals who have demonstrated advanced knowledge in the multiple processes of aging.

#### How to Qualify

To qualify for the CSA certification, and to use the CSA designation, individuals must meet the following requirements:

- Complete the candidate information profile.
- Complete the disclosure questionnaire.
- Pass the CSA certification examination.
- Pass a criminal background check.
- Pass the Roles, Rules, and Responsibilities Ethics Exam.

- Complete and submit the signed Certified Senior Advisors Application for Certification.
- Includes agreeing to the CSA Terms of awarding and maintaining certification.
- Agree to abide by and uphold the **CSA Code of Professional Responsibility**.
- Complete 30 hours of continuing education every three years. Each hour must include 50 minutes of an activity that educates on an aspect of aging whether it be directly or indirectly relatable to the benefit of older adults. An example of direct education would be courses that educate on health, financial, or social topics in aging such as dementia, Alzheimer's, senior housing, etc. Indirect forms of education include any training or activity that could be applicable to older adults along with other clients. A good example for indirect topics is ethics related courses. No sales or marketing related courses or topics will be accepted.

For more information about the CSA Certification program please review the **CSA Certification Handbook** located on their website [www.csa.us](http://www.csa.us).

### **Item 3- Disciplinary Information**

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NO disclosure information is applicable to this Item.

### **Item 4- Other Investment Related Business Activities**

NONE

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

NONE

### **Item 6- Supervision**

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you have questions related to these activities, please contact S. Hardy Taylor, VP, CCO or Frederick R. MacLean, Jr. at (954) 785-5400.

**Item 7- Requirements for State-Registered Advisers**

Heritage is an SEC Registered Investment Adviser; therefore, this section is not applicable.



**Item 1- Cover Page**

**Frederick R. MacLean III, CFP®**

**Heritage Investment Group, Inc.**

**2480 NE 23<sup>rd</sup> Street Pompano Beach, FL 33062**

**(954)-785-5400**

**09/12/2023**

**This brochure supplement provides information about Frederick R. MacLean III that supplements the Heritage Investment Group, Inc. (“Heritage”) brochure (“brochure”). You should have received a copy of that brochure. Please contact S. Hardy Taylor, VP, CCO at (954) 785-5400 if you did not receive Heritage’s brochure or if you have any questions about the contents of this supplement.**

**Additional information about Frederick R. MacLean III is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

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

**Frederick R. MacLean III, CRD no. 6869834**

Year of Birth-1994

**EDUCATION:**

Bachelor of Science-Mathematical Business-Wake Forest University (2017)

**EMPLOYMENT:**

Associate Wealth Manager-Heritage Investment Group, Inc. (07/2021 to Present)

Senior Associate/Associate-DFA Securities LLC (12/2017 to 05/2021)

Senior Associate/Associate-Dimensional Fund Advisors (08/2017 to 04/2021)

Student-Wake Forest University (08/2013 to 05/2017)

**PROFESSIONAL DESIGNATIONS:**

Certified Financial Planner (2023)

**PROFESSIONAL DESIGNATION DISCLOSURES:**

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Please refer directly to the website of the issuing organization for additional information about this credential. **Item 3- Disciplinary Information**

Heritage Investment Group, Inc. is required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice.

NO disclosure information is applicable to this Item.

#### **Item 4- Other Investment Related Business Activities**

NONE

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

NONE

#### **Item 6- Supervision**

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of Ethics that requires each employee to always act in the client's best interest. Should you have questions related to these activities, please contact S. Hardy Taylor, VP, CCO or Frederick R. MacLean, Jr. at (954) 785-5400.

**Item 7- Requirements for State-Registered Advisers**

Heritage is an SEC Registered Investment Adviser; therefore, this section is not applicable.

## Heritage Investment Group, Inc. (“HIG”) and Retirement Plan Account(s). (Updated 07\_2022)

When Heritage provides investment advice regarding retirement plan (“Plan”) accounts or individual retirement accounts (“IRAs”), we are considered fiduciaries within the meaning of Title 1 of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. Our revenue model creates some conflicts of interest so we operate under a special rule created by the Department of Labor (the “DOL”) that mitigates conflicts requiring us to operate under the provisions listed below.

Under the DOL’s special rule provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of your interests when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interests, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than what is reasonable for our services; and
- Provide you with information about conflicts of interest.

To ensure that Heritage meets these standards and the other various regulatory requirements, as well as mitigate any conflicting bias in hiring Heritage to work on these account types, Heritage has adopted a policy of educating investors about potential advantages and disadvantages of hiring Heritage for retirement and IRA plans.

The decision to rollover your **Employer-Sponsored Retirement Plan** (“plan”) assets to an **Individual Retirement Account** (IRA) rather than keep your assets in the plan should reflect consideration of various factors. These factors have varying levels of impact depending on your specific needs and circumstances. This table below is designed to help educate you about those factors to make the best decision for your specific needs and circumstances. It is intended to supplement other required disclosure documents such as the **Form CRS** and the **ADV Form 2A-2B**.

When considering moving your assets from a company-sponsored plan or move/open an IRA account, you typically have multiple options (and may engage in a combination of these options), which are summarized herein. It is important to review and understand the respective advantages and disadvantages of each option and, if needed, consult with a tax professional before making any decisions. Heritage does not engage in making direct recommendations as it relates to which of these options is best for your situation. **If you decide to hire Heritage after a review of these important factors, we will require you to sign the last page of this acknowledgement.**

### Option 1: Leave assets in former employer’s plan (if applicable)

Advantages	Disadvantages
<ul style="list-style-type: none"><li>• Maintains tax-deferred status of savings</li><li>• Keep current investment choices</li><li>• Preserve any guaranteed interest rate</li><li>• Keeps ownership of company stock in the account where it may have certain tax benefits at withdrawal</li><li>• Fees in former employer plan may be lower than similar individual accounts</li><li>• Plan fiduciary is required to prudently monitor the cost and quality of the investment options</li><li>• IRS penalty-free withdrawals if investor is at least 55 years old in the year he/she left employer</li><li>• Protected from creditors and bankruptcy</li><li>• Plan may provide access to planning tools, educational resources, and phone helpline</li></ul>	<ul style="list-style-type: none"><li>• Changes made to the plan by former employer may impact assets that remain (i.e., plan investments, fees, services, plan providers, plan termination)</li><li>• Investment choices may be limited</li><li>• Subjects investor to limitations of the plan, including income distribution provisions when investor retires</li><li>• Account may be assessed fees for plan administration or other fees associated with the plan</li><li>• Access to personalized investment advice or advice that takes into account other investor assets may not be available through the retirement plan</li><li>• No new contributions will be allowed</li></ul>

## Option 2: Rollover the assets to a new employer's plan (if applicable)

Advantages	Disadvantages
<ul style="list-style-type: none"> <li>• Maintains tax-deferred status of savings</li> <li>• Continue to make contributions and save for retirement</li> <li>• Combine other qualified plans or IRA savings into one account</li> <li>• Fees in employer plan may be lower than similar individual accounts</li> <li>• Plan fiduciary required to prudently monitor the cost and quality of the investment options available to the plan</li> <li>• IRS penalty-free withdrawals if investor is at least 55 years old in the year the investor leaves his/her job</li> <li>• Protected from creditors and bankruptcy</li> <li>• Plan may provide access to planning tools, educational resources and phone helpline</li> <li>• Loan provisions may allow borrowing from the rolled over money</li> <li>• No required minimum distribution at age 72 from a current employer's plan, unless investor is a 5% or more owner of the company</li> </ul>	<ul style="list-style-type: none"> <li>• Changes made to the plan by your employer will impact you (i.e., plan investments, fees, services, plan providers, plan termination)</li> <li>• Investment choices limited to those the plan offers</li> <li>• Subjects investor to the limitations of the plan, including income distribution provisions when investor retires</li> <li>• Account may be assessed fees for plan administration or other fees associated with the plan</li> <li>• Access to personalized investment advice or advice that takes into account the investor's other assets or particular needs may not be available through the retirement plan</li> <li>• Plan may offer fewer or more expensive investment options than investor's former employer's plan</li> <li>• May be more restrictive on withdrawals while employed</li> <li>• Roll-ins may not be allowed, or an eligibility period may need to be satisfied</li> <li>• In-kind transfers of company stock will result in appreciated value being taxed as ordinary income at withdrawal from the retirement plan</li> </ul>

## Option 3: Cash out the Employer Plan assets and close the account (if applicable)

Advantages	Disadvantages
<ul style="list-style-type: none"> <li>• Immediate access to cash</li> <li>• May see significant tax advantage for company stock that has substantially appreciated</li> <li>• If after-tax contributions were made, could take these amounts tax-free (though investor will be required to pay tax on the earnings of these contributions)</li> </ul>	<ul style="list-style-type: none"> <li>• At distribution, 20% withheld on the taxable account balance for prepayment of federal income taxes</li> <li>• State taxes and a 10% early distribution penalty may also apply on taxable account balance</li> <li>• If these assets are no longer set aside for retirement, savings will need to be available from other sources when investor retires or can no longer work</li> <li>• May move investor to a higher tax bracket</li> <li>• Forfeits future tax-deferred growth potential</li> <li>• Removing creditors or bankruptcy benefits of an ERISA plan</li> </ul>

## Option 4: Rollover Employer Plan assets to an IRA (if applicable)

Advantages	Disadvantages
<ul style="list-style-type: none"> <li>• Maintains tax-deferred status of savings</li> <li>• Continue to make contributions and save for retirement, subject to contribution limitations</li> <li>• Combine other qualified plans or IRA savings into one account</li> <li>• Offers greater control as the investor has more options</li> <li>• Offers broad range of investment options to fit needs as they change over time</li> <li>• Protected from bankruptcy</li> <li>• May have the services of a financial professional to help with investing and retirement planning, professional may be able to give advice based on holistic financial picture</li> <li>• Flexibility when setting up periodic or unscheduled withdrawals</li> <li>• May help with planning and managing required minimum distributions at age 72</li> </ul>	<ul style="list-style-type: none"> <li>• Investment expenses and account fees may be higher than those of employer plans</li> <li>• No fiduciary required to prudently monitor the cost and quality of the investment options</li> <li>• IRS penalty-free withdrawals generally not allowed until age 59 ½</li> <li>• Loans not allowed, can only access money by taking a taxable distribution</li> <li>• Limited protection from creditors</li> <li>• In-kind transfers of company stock to an IRA will result in appreciated value being taxed as ordinary income at withdrawal from the IRA</li> </ul>

**Option 5: Option 5: Existing Rollover IRA back to Original Employer Plan (if applicable)**

Advantages	Disadvantages
<ul style="list-style-type: none"><li>• For advantages and disadvantages, please refer to Option 1</li></ul>	<ul style="list-style-type: none"><li>• Your ability to roll your IRA back into your original employer plan may not be an option and is subject to the rules and regulations of your original plan</li></ul>

**Option 6: Existing IRA or New IRA to a Fee Based IRA (if applicable)**

Advantages	Disadvantages
<ul style="list-style-type: none"><li>• Prefers to have professional advice/management</li><li>• Would like to have more holistic planning services for other matters</li><li>• Would like to consolidate assets with single advisor</li><li>• Prefer assistance with tax strategies and cash flow management decisions</li><li>• Prefer Assistance with charitable distributions</li></ul>	<ul style="list-style-type: none"><li>• May increase overall costs</li><li>• Possibility of decreased investment returns</li></ul>

**Client Signature**

I understand the options I have with my retirement assets. I further understand that all the choices available to me come with advantages and disadvantages. I have considered these factors prior to making my decision. I understand that HIG has solely provided me with the necessary education to make an informed decision about my specific retirement plan assets and attest to the unsolicited nature of my choice and wish to proceed in working with HIG.

\_\_\_\_\_  
*Signature*

\_\_\_\_\_  
*Client Printed Name*

\_\_\_\_\_  
*Date*

**HIG Wealth Manager Signature**

I certify that the education I provided is accurate and true to my knowledge. I have provided all material facts to the Client(s), all required disclosure documents as required by HIG, and did not otherwise attempt to influence their decision.

\_\_\_\_\_  
*Signature*

\_\_\_\_\_  
*Date*

**HIG Compliance Officer Signature**

\_\_\_\_\_  
*Signature*

\_\_\_\_\_  
*Date*