

Item 1 – Cover Page

Essex Financial Services, Inc.

176 Westbrook Road
P.O. Box 999
Essex, Connecticut 06426-0999

(860) 767-4300

(800) 900-5972

www.essexfinancialservices.com

Firm Brochure
(Part 2A of Form ADV)

October 25, 2019

This Brochure provides information about the qualifications and business practices of Essex Financial Services, Inc. If you have any questions about the contents of this Brochure, please contact us at (860)-767-4300 or via email at info@essexfinancialservices.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.

Essex Financial Services, Inc. is a registered investment adviser under the Investment Advisers Act of 1920 (the “Advisers Act”). 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 Essex Financial Services, Inc. also is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 – Material Changes

The following material changes have occurred since our last update on December 27, 2018:

Item 4 has been updated to reflect that, as of September 30, 2019, Essex Financial Services, Inc.'s discretionary assets under management were approximately \$1.386 billion and non-discretionary assets were approximately \$871 million.

Item 9 has been updated to reflect Essex Financial Services, Inc.'s consent to the entering of an Order by the U.S. Securities and Exchange Commission (the "SEC") in connection with the firm's voluntary participation in the SEC's Share Class Selection Disclosure Initiative.

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 SEC Rules, we will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year. We may further provide other ongoing disclosure information about material changes as necessary.

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

Currently, our Brochure may be requested by contacting Michael O'Rourke, Chief Compliance Officer, at (860) 767-4300 or info@essexfinancialservices.com. Our Brochure is also available on our web site www.essexfinancialservices.com free of charge.

Additional information about Essex Financial Services, Inc. is also available via the SEC's web site www.adviserinfo.sec.gov. The SEC's web site also provides information about any persons affiliated with Essex Financial Services, Inc. who are registered, or are required to be registered, as investment adviser representatives of the firm. You can search this site by a unique identifying number, known as a CRD number. The CRD number for EFS is 127549.

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Item 4 – Advisory Business

Essex Financial Services, Inc. (hereinafter “EFS”) is a Securities and Exchange Commission (“SEC”) Registered Investment Adviser and Financial Industry Regulatory Authority (“FINRA”) registered Broker-Dealer and Member. EFS is also licensed as an insurance agency with the State of Connecticut Insurance Department. EFS is a wholly-owned subsidiary of Essex Savings Bank.

EFS provides portfolio management and financial advisory services to its clients. The services include, but are not limited to investment management, personal financial planning and consulting, employee benefit retirement plan services, and the sponsoring of certain “wrap-fee programs”.

As of September 30, 2019, EFS’ discretionary assets under management were approximately \$1.386 billion and non-discretionary assets were approximately \$871 million.

INVESTMENT MANAGEMENT SERVICES

Flagship Program

EFS provides investment management services to its clients on both a discretionary and non-discretionary basis. The primary management program is referred to as the Essex Financial Services Flagship Program (the “Flagship Program”), and an account opened under this program is referred to as an Essex Financial Services Flagship Account (“Flagship Account”). In general, the investment management services provided by EFS to its clients in connection with the Flagship Program are based on a client profile completed by the EFS Financial Advisor with the assistance of the client. The client profile describes, among other things, the client’s investment objectives, time horizon, risk tolerance, tax bracket and income needs. After identifying the client’s objectives, the Financial Advisor constructs a strategic allocation of assets among several investment categories. These categories may include large capitalization stocks, mid-capitalization stocks, small capitalization stocks, equity options, government, corporate, and municipal bonds, international equities, exchange traded funds (“ETF’s”), mutual funds, and, on a limited basis, certain private funds. Upon completion of the asset allocation, the Financial Advisor will select investments and build a portfolio based on criteria such as historical performance, rate of return, correlation characteristics, and performance relative to an index.

In connection with EFS's investment management services, clients may place reasonable restrictions on the investments in the portfolio or the allocation of assets among various classes. The Financial Advisor will assist the client in understanding and evaluating the potential impact of these restrictions on the portfolio.

FINANCIAL PLANNING AND CONSULTING SERVICES

EFS may, from time to time, provide clients with certain financial planning services or other consulting services. EFS Financial Advisors may prepare a financial plan for clients based upon, among other things, the client's net worth, cash flow, tax situation, retirement needs, employment benefit plans, current investments, and education planning.

Clients may also receive investment advice on a more limited or project-by-project basis. This may include advice on isolated areas of concern such as estate planning or valuation, retirement planning, or any other specific topic. It may also include specific consultation or administrative services regarding financial and investment concerns of the client or the client's business concerns.

EMPLOYEE BENEFIT RETIREMENT PLAN SERVICES

EFS provides advisory services to participant-directed employee retirement benefit plans. EFS analyzes the plan's current investment platform and assists the plan and its participants in creating an investment policy statement defining the types of investments to be offered and the restrictions that may be imposed. EFS will recommend investment options to achieve the plan's objectives, provide participant education meetings, and monitor the performance of the plan's investment vehicles.

SPONSORED WRAP-FEE PROGRAMS

Essex Financial Services, pursuant to an agreement with Lockwood Advisors, Inc. ("Lockwood"), an investment management company based in King of Prussia, Pennsylvania, offers, through its SELECT Program, a Separately Managed Accounts (SMA Account) program, Lockwood's AdvisorFlex portfolio modeling product and Lockwood's Third Party Model Provider Portfolios product.

A. SMA Account

The SMA option allows clients, in conjunction with EFS's Investment Advisory Representatives (Financial Advisors) to independently select the discretionary investment

advisory services of certain professional portfolio management firms for the individual management of client accounts.

B. AdvisorFlex Account

AdvisorFlex offers a series of objectives-based portfolio modeling strategies, selected and managed by Lockwood, that provide investors with access to professionally managed solutions and seeks to address the unique challenges presented at each phase of the investor lifecycle, from wealth accumulation, to the transition into retirement, and ultimately, the management and distribution of income.

The AdvisorFlex product includes three (3), objectives-based strategies, Appreciation, Income and Preservation (the “Strategies”), with multiple models within each strategy, as described further in EFS’s Wrap Fee Brochure, which can be obtained from EFS upon request.

C. Third Party Model Provider Portfolios

Lockwood provides access to certain model portfolios (each a “Model Portfolio”) of third party model providers (each a “Model Provider”). The Third Party Model Provider Portfolios include Lockwood as Manager and various Model Providers who provide strategy-specific Model Portfolios. Lockwood will act as a discretionary Manager, and will, in its discretion, manage Portfolio Accounts based on the selected Model Portfolio. When a Model Provider makes model portfolio changes, the Model Provider will notify Lockwood, who will make the necessary changes to the Model Portfolio Accounts at its sole discretion. In its capacity as a Manager, Lockwood is authorized to rebalance portfolios within the Model Portfolio Accounts to within specified acceptable allocation ranges determined by Lockwood.

Essex Financial Services Financial Advisors are responsible for: 1) assisting each Investor in selecting the Model Portfolio(s) that is/are suitable for that Investor; 2) monitoring whether a Model Portfolio continues to be suitable for an Investor; and 3) communicating any Investor restrictions to Lockwood.

The Third Party Model Provider Portfolios product is described further in EFS’s Wrap Fee Brochure, which can be obtained from EFS upon request.

INDEPENDENT MANAGERS/INVESTMENT PROGRAMS

In addition to the above asset management services, EFS may also recommend that certain clients authorize the active discretionary management of their assets by and/or among certain independent investment advisory programs.

EFS may recommend investment programs, based upon the stated investment objectives of the client, including, but not limited to:

- Clinton Investment Management LLC
- Cincinnati Asset Management Inc.
- Dunham & Associates Investment Counsel Inc.
- Gilman Hill Asset Management, LLC
- Glenmede Investment Management LP
- Gurtin Fixed Income Management

The terms and conditions under which the client shall engage the Independent Manager[s] shall be set forth in a separate written agreement between the client and the designated Independent Manager[s].

EFS shall continue to render advisory services to the client relative to the ongoing monitoring of account performance and renewing client investment objectives, for which EFS shall usually receive an annual fee based upon a percentage of the market value of the assets being managed by the designated Independent Manager[s]. Factors which EFS shall consider in recommending Independent Manager[s] include the client's stated investment objective(s), management style, performance, reputation, financial strength, reporting and pricing. With regards to these accounts, in most circumstances, EFS remains the sole and exclusive broker dealer and maintenance of custody shall be through Pershing. More information on Independent Managers can be obtained by request.

INSURANCE SERVICES

As a registered broker-dealer and as a licensed insurance agent, EFS sells products and services consistent with those businesses, including securities and insurance policies. In addition, EFS, as an insurance agency, offers fixed annuities and other insurance products. Financial Advisors who are licensed as insurance agents may offer these products to clients for separate and typical compensation. No client is obligated to use EFS or the Financial Advisors to purchase fixed annuities or other insurance products.

Item 5 – Fees and Compensation

The specific manner in which fees are charged by EFS is established in a client's written agreement with EFS. In certain instances when a third-party manager is used in the context of a wrap fee program sponsored by Lockwood Advisors, Inc., the client may have written agreements containing fee arrangements with both EFS and the third-party manager.

In general, all fees discussed in this section are negotiable based a number of factors.

Flagship Program Fees

Advisory fees for Flagship Accounts are charged quarterly in advance and, unless EFS otherwise agrees in writing, are automatically deducted by Pershing from the Account. The advisory fee is based upon a percentage of the market value of all assets in the Flagship Account on the last trading day of each preceding quarter. The standard fee schedule may, in certain circumstances, be negotiable or vary based upon, among other things, the size of the Flagship Account and other accounts with EFS. In any partial quarter, the advisory fee will be provided based upon the number of days that the Flagship Account was open. In addition to the investment advisory and transaction charges, clients may incur a nominal charge per transaction for handling and postage. Clients may also incur charges for other account services provided by EFS not directly related to the execution and clearing of transactions including, but not limited to, IRA custodial fees, safekeeping fees, interest charges on margin loans, and fees for legal or courtesy transfers of securities.

The value of the managed account shall be determined on the basis of such asset statements as are provided by the custodian of the account or by any investment vehicle utilized in the account. Flagship Accounts initiated or terminated during a calendar quarter will be charged a prorated fee. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable. The client has the right to terminate an agreement without penalty within five business days after entering into the agreement.

The following fee schedule for “Flagship Accounts” may vary as discussed above and is negotiable by the Financial Advisor:

	<u>Account Value</u>	<u>Annualized Fee</u>
Up to	\$999,999	1.50%
From	\$1,000,000-2,999,999	1.25%
From	\$3,000,000-4,999,999	1.00%
From	\$5,000,000-9,999,999	.75%
Over	\$10,000,000	Negotiable

Certain of the open-end mutual funds that are purchased or held in the Flagship Account, in addition to assessing management fees, internally assess distribution, administrative and other service fees, commonly referred to as 12b-1 fees. Those mutual funds pay EFS such fees for each year in which an EFS Flagship Account client maintains a balance in the fund. These fees are in addition to EFS’s investment advisory and transaction fees and are generally in an amount equal to .25% or more of the mutual fund balance in the Flagship Account. Such fees are included in the calculation of operating expenses of a mutual fund, with the result that these funds may have higher ongoing operating expenses (and thus, higher expense ratios) than funds that do not pay such fees. The existence of such fees is disclosed in the prospectus for each mutual fund. For ERISA and IRA accounts (so-called “qualified accounts”), distribution and related fees received by EFS are credited to the client’s account. Such fees are not credited to non-qualified accounts.

Many of the mutual funds that assess 12b-1 fees and pass those along to EFS also have institutional share classes which do not assess 12b-1 fees and therefore have a lower expense ratio. This presents a conflict of interest for EFS to recommend the purchase of or holding of mutual fund share classes that result in greater compensation to EFS.

EFS has taken steps to minimize this conflict of interest, including by providing its Financial Advisors with training and guidance on this issue, as well as conducting periodic reviews of client holdings in mutual fund investments to ensure the appropriateness of mutual fund share class selections and to determine whether alternative mutual fund share class selections are available that might be more appropriate given the client’s investment objectives and other appropriate considerations. There are a number of factors taken into consideration in this analysis, including, but not limited to: the availability of particular

institutional share classes through Pershing (EFS's custodian for Flagship accounts), minimum fund purchase and other eligibility requirements, whether transaction charges are assessed for the purchase or sale of a particular share class and expected trading volume for the client's account (due to rebalances, contributions and withdrawals). Regardless of such considerations, EFS clients should not assume that EFS will obtain best execution for purchases of mutual funds with multiple available share classes or that they will be invested in the share class with the lowest possible expense ratio.

EFS may charge fees to clients which do not comport with the fee schedule set out above. EFS reserves the right to charge a fee which is less than the amount on the fee schedule. It will not charge its clients more than the amount in the fee schedule. In addition EFS may reduce or waive the transaction fee it charges for transactions executed in client accounts. The consideration for modifying the transaction fee may involve the amount of the fee paid for investment advisory services set out above.

EFS, in its capacity as a registered broker-dealer and member of the FINRA, will be the primary broker-dealer through which securities transactions for Flagship Accounts will be processed. Clients who want to participate in the Flagship Program are required to utilize EFS for such purposes. EFS clears its securities transactions on a fully disclosed basis through Pershing. In addition, Pershing will act as the sole custodian for all the assets in the Flagship Account. In addition to its annual advisory fee, EFS will charge the client a transaction fee for executing transactions. Equity trades will have a \$15 transaction charge. Options, bonds, and certificates of deposit will have a \$25 transaction charge. Mutual fund purchases will have a \$15 transaction charge. The actual expense incurred by EFS for effecting transactions may be more or less than the charges described above. In the event a Flagship Account is maintained on behalf of a plan subject to the Employee Retirement Income Security Act of 1974, as amended ("*ERISA*") or similar government regulation, transaction and clearing fees shall be charged by EFS in an amount equal to its actual cost without mark-up.

To the extent that clients in the Flagship Program utilize Pershing LLC for margin loan financing, EFS will receive interest sharing compensation related to such margin loans. This presents a conflict of interest for EFS to recommend the purchase of securities on margin or borrowing funds from an account utilizing the securities in the account as collateral as it results in additional compensation to EFS.

EFS also receives a portion of the fees charged by Pershing LLC for account transfer.

Item 12 “Brokerage Practices” further describes the additional practices and fees related to EFS in its capacity as a broker dealer.

FINANCIAL PLANNING FEES

The fees for these services may be a fixed amount based upon the issues to be addressed by the Financial Advisor, or may be based on an hourly charge. Fees for plans will typically range from \$250 to \$5,000. Hourly fees will generally range from \$75 to \$250, depending upon the experience of the Financial Advisor. Fees for financial planning and other services are generally negotiable by the Financial Advisor.

RETIREMENT PLAN SERVICES

Fees for Employee Benefit Retirement Plan services are negotiable and based on a number of factors including plan assets under management and the scope of the engagement.

WRAP FEE SCHEDULES

Clients should be aware that fees for wrap programs are not rebated if the client terminates the account prior to a one-year period. Fees for wrap fee services through Lockwood are described in greater detail in the Wrap Fee Brochure, which can be obtained upon request.

INDEPENDENT MANAGERS

Fees for the limited number of accounts which are outsourced to specialty or third-party managers are defined in the Services Agreement between EFS and the client. Further information about third-party manager services, including the fee schedule, can be obtained by request from EFS.

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

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

Item 7 – Types of Clients

Essex Financial Services Inc. (EFS) provides portfolio management services to a variety of

clients including individuals, high net worth individuals, corporations, corporate pension and profit-sharing plans, Taft-Hartley plans, trusts, estates, charitable institutions, foundations, endowments and municipalities.

EFS generally requires a minimum of \$25,000 for Flagship Account clients. Account minimums for wrap fee SMA Accounts generally range from \$100,000 to \$250,000. The minimum for ADVISORFLEX Accounts is \$50,000, with minimum, subsequent contributions of \$1,000.

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

ANALYSIS AND SCREENING PROCESS

Analysis and investment strategies for individual “Flagship Accounts” are part of a customized process based on interview and understanding of clients’ needs and objectives. Financial Advisors work closely with individual clients to determine suitability of investments and portfolio construction.

The EFS Investment Committee is comprised of a number of the firm’s Financial Advisors who provide investment advisory services. The Investment Committee actively screens investment opportunities, including mutual funds, individual stocks, Exchange Traded Funds (“ETF”s) and debt securities utilizing third party services and in-house criteria. Investment Committee screening aims to produce actionable “Research Lists” which can be further reviewed in light of a clients’ needs and objectives. “Research Lists” are examined and updated on an ongoing and at least monthly basis.

Mutual Funds and, to a lesser extent, ETFs are reviewed using the following criteria:

- The fund’s performance versus benchmarks for 1,3,5, and 10-year periods;
- The percentage rank during the same periods;
- Expense ratios and fee structures;
- The fund or vehicle’s management team and tenure;
- The fund’s historical risk and return characteristics; and
- Any other factors considered relevant.

Individual stocks are reviewed using fundamental criteria such as earnings-based rankings to create similar “Research” lists.

Individual bonds and debt securities are reviewed through various research and pricing platforms utilized by EFS.

The Investment Committee employs its review and screening process across the spectrum of investment vehicles to narrow the universe from which Investment Advisors structure client accounts.

Investment Advisors may also serve to guide clients toward appropriate strategies, given clients' needs and objectives, amongst wrap fee alternatives with Lockwood.

Technical Analysis, including Charting and the active monitoring of markets and individual positions, is used as a means of confirming fundamental screening analysis. Various technical tools in trading and research platforms are monitored for relative strength analysis of individual positions versus group and sector performance.

RISKS

All investing involves a risk of loss that clients should be prepared to bear. EFS's management strategies, including both the Flagship Program and wrap fee alternatives, involve such risk of loss.

All investments present the risk of loss of principal – the risk that the value of securities (mutual funds, ETFs, options, debt securities, and alternative investments in private funds), when sold or otherwise disposed of, may be less than the price paid for the securities. Even when the value of the securities at the time of sale is greater than the price paid, there is the risk that the appreciation will be less than inflation. In other words, the purchasing power of the proceeds may be less than the purchasing power of the original investment.

Mutual funds and ETFs utilized by EFS may include funds invested in domestic and international equities, including real estate investment trusts (REITs), corporate, government, and municipal fixed income securities, and commodities. Equity securities may include large capitalization, medium capitalization, and small capitalization stocks. Mutual funds and ETF shares invested in fixed income securities are subject to the same interest rate, inflation and credit risks associated with the underlying bond holdings.

Among the riskiest mutual funds used in EFS's investment strategies funds are the U.S. and International small capitalization and small capitalization value funds, emerging market funds, and commodity futures funds. Conservative fixed income securities have lower risk

of loss of principal, but most bonds (with the exception of Treasury Inflation Protected Securities or TIPS) present the risk of loss of purchasing power through lower expected returns. This risk is greatest for longer-term bonds.

Certain funds utilized by EFS may contain international securities. Investing outside the United States involves additional risks, such as currency fluctuations, periods of illiquidity and price volatility. These risks may be greater with investments in developing countries.

More information about the risks of any particular mutual fund, private fund and market sectors can be reviewed in mutual fund and private fund prospectuses.

Item 9 – Disciplinary Information

EFS self-reported to the SEC the violations described below pursuant to the SEC’s Share Class Selection Disclosure Initiative (the “Initiative”). Pursuant to the Initiative, EFS reported that, during the period from January 1, 2014 through May 22, 2018, EFS placed clients in mutual fund share classes that charged 12b-1 fees when lower cost share classes may have been available. The SEC found that EFS failed to make adequate disclosure, in its Form ADV or otherwise, regarding its mutual fund share class selection practices, and the 12b-1 fees it received in connection with advisory accounts. Specifically, the SEC found that EFS failed to adequately disclose conflicts of interest related to the sale of higher cost mutual fund share classes when lower cost share classes were available, in violation of Section 206(2) of the Advisers Act. On September 30, 2019, without admitting or denying the findings, EFS consented to the entry of an Order by the SEC pursuant to which EFS agreed to cease and desist from committing or causing any future violations of Section 206(2) of the Advisers Act, to notify affected clients about the terms of the Order, and to pay disgorgement and interest to affected accounts in the amount of \$645,000, which is less than the \$2,755,879 of 12b-1 fees EFS received and any prejudgment interest for the relevant period. The SEC waived payments in excess of \$645,000 based upon the firm’s self-reporting and the financial impact to the firm. Additionally, as required by the Order, EFS has enhanced its disclosure regarding mutual fund share class selection, reviewed existing client accounts to determine whether they should be moved to a lower-cost share class, and updated its policies and procedures regarding mutual fund share class selection.

On November 23, 2015, EFS entered into an Order with the Banking Commissioner of the State of Connecticut (“Commissioner”). The Order alleged that the firm, in violation of Connecticut law, engaged an unregistered investment adviser agent and failed to keep required records related to payments made to such unregistered agent and to establish, enforce and maintain a supervisory system that was reasonably designed to achieve

compliance with applicable securities laws and regulations. The alleged violations related to payments the firm made to an attorney at the direction of the firm's former president and CEO in connection with a client referral. Without admitting or denying the allegations, the firm consented to a \$25,000 administrative fine. In the Order, the Commissioner acknowledged that the firm self-reported the alleged violations to the Department of Banking and cooperated with the Connecticut Securities Division throughout its examination and investigation. On November 23, 2015, the firm terminated the employment of its former president in connection with this matter.

On January 9, 2017, EFS was sanctioned by the SEC for violating the cash solicitation portions of the Advisers Act which prohibit the payment of referral fees to a solicitor unless certain disclosure and other requirements are met. The alleged violations were in connection to the improper referral arrangement discussed above. Without admitting or denying the allegations, the firm consented to the findings and agreed to pay disgorgement of \$170,000 (plus interest), which represented revenue the firm received from the improper referral fee arrangement.

In April of 2012 EFS was censured and fined for failing to establish and maintain a supervisory system for, and to establish, maintain and enforce written supervisory procedures that were reasonably designed to achieve compliance relating to, waiver of mutual fund sales charges in violation of NASD and FINRA rules. Without admitting or denying the allegations, the firm consented to the findings and implemented procedures to prevent a reoccurrence of the activity.

Item 10 – Other Financial Industry Activities and Affiliations

EFS is a wholly-owned subsidiary of Essex Savings Bank ("*Bank*"). Certain of EFS's directors are also directors of the Bank. Financial Advisors may recommend the use of the Bank to clients in need of banking services. No client is obligated to use the Bank for any banking service. Any compensation received by the Bank for providing banking services is entirely separate and distinct from the advisory fees charged by EFS. Financial Advisors receive no compensation for recommending the Bank to advisory clients.

In addition to offering investment advisory and broker-dealer services, EFS is also licensed as an insurance agency with the State of Connecticut Insurance Department. It is expected that EFS and its executive officers will spend more than fifty percent of their time on investment advisory services and less than fifty percent of their time on brokerage and insurance related activities. As a registered broker-dealer and as a licensed insurance

agent, EFS sells products and services consistent with those businesses, including securities and insurance policies.

EFS offers to a limited number of clients alternative investment opportunities through Central Park Group, LLC. Central Park Group, LLC, together with its affiliates, is an independent investment advisory firm that specializes in alternative investment strategies. The Firm offers investments managed by private equity, hedge fund, real estate and fund-of-funds sponsors.

Item 11 - Code of Ethics, Participation in Client Transactions and Personal Trading

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

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

monitored under the Code of Ethics, and to reasonably prevent conflicts of interest between EFS and its clients.

EFS's clients or prospective clients may request a copy of the firm's Code of Ethics by contacting the Chief Compliance Officer, Michael O'Rourke.

EFS or any related person(s) may have an interest or position in certain securities which may also be recommended to a client. These situations represent a conflict of interest. EFS has established the following restrictions in order to ensure its fiduciary responsibilities:

1. A director, officer or employee of EFS shall not buy or sell securities for their personal portfolio where their decision is substantially derived, in whole or in part, by reason of his or her employment with EFS unless the information is also available to the investing public on reasonable inquiry.
2. EFS maintains a list of all securities holdings (except mutual funds and government securities) for itself and its related persons. These holdings are reviewed on a regular basis by the Compliance Department.
3. All clients are fully informed that certain individuals associated with EFS may receive compensation when effecting transactions for clients.
4. EFS emphasizes the unrestricted right of the client to decline to implement any investment advice.
5. In connection with its Financial Planning Services, EFS emphasizes the unrestricted right of the client to select and choose any broker or dealer and/or insurance company through which to implement recommendations.
6. EFS requires all related persons to act in accordance with all applicable Federal and State regulations governing investment advisory services, including the Insider Trading and Securities Fraud Enforcement Act of 1988, as amended.

Any individual not in observance of the above may be subject to termination or other disciplinary action by EFS.

In its capacity as an investment advisor, EFS's policy is that the firm will not participate in principal or agency cross transactions. 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. Agency cross transactions may arise where an adviser is dually registered as a broker-dealer or has an affiliated broker-dealer.

Item 12 – Brokerage Practices

EFS, in its capacity as a registered broker-dealer and member of FINRA, will be the primary broker-dealer through which securities transactions for Flagship Accounts will be processed. Clients who want to participate in the Flagship Program are required to utilize EFS for such purposes. EFS clears its securities transactions on a fully disclosed basis through Pershing. Clients should understand that EFS and its Financial Advisors have a conflict of interest with respect to transactions effected through EFS.

EFS does not accept directed brokerage business from clients or account instructions to transact through other broker dealers.

EFS, as a registered broker-dealer, and the Financial Advisors, as registered representatives of EFS, may receive separate and typical compensation from any brokerage transaction they implement on behalf of EFS. Except with respect to the Flagship Program, no investment advisory client is obligated to use EFS or the Financial Advisors for brokerage services.

Because EFS requires that clients utilize Pershing for clearing of securities transactions and custody of the Flagship Accounts, EFS receives economic benefits which it may not receive if EFS did not give investment advice to clients. These benefits may include receipt of duplicate confirmations and duplicate statements, access to a trading desk, ability to have investment advisory fees deducted directly from client accounts, access to an electronic communications network for client account information and receipt of compliance publications.

In addition, in its capacity as broker-dealer, EFS and the Financial Advisors may receive certain 12(b)-1 fees and other distribution and administrative fees from mutual funds in which client funds are invested as described in Item 5. These fees are in addition to EFS's investment advisory and transaction fees.

Client accounts are transacted on an individual basis based on the Financial Advisor's recommendation. For clients with discretionary accounts, EFS requests that it be provided with written authority to determine which securities and the amounts of securities that are bought or sold. This authority is contained in the Investment Management Agreement each client is required to sign. Any limitations on this discretionary authority shall be included in this written authority statement. Clients may change or amend these limitations as required. Such amendments shall be submitted to EFS in writing.

In certain limited circumstances for fixed income transactions, EFS may request that it be provided with written authority to determine the broker-dealer to use for client transactions and the commission costs that will be charged to clients for these transactions. In this instance EFS will monitor the fixed income trading services to assess the quality of broker-dealer services and client fixed income transactions and approve the selection of those brokers or dealers which will provide the best services at the lowest commission rates possible. EFS will assess the broker-dealer's ability to provide professional services, competitive execution, and any other services which will aid EFS in providing enhanced investment management services to its clients.

EFS also has an arrangement with Fidelity Brokerage Services LLC ("Fidelity") through which Fidelity provides our firm with "institutional platform services." The institutional platform services include, among others, brokerage, custody, and other related services. Fidelity's institutional platform services that assist us in managing and administering clients' accounts include software and other technology that (i) provide access to client account data (such as trade confirmations and account statements); (ii) facilitate trade execution and allocate aggregated trade orders for multiple client accounts; (iii) provide research, pricing and other market data; (iv) facilitate payment of fees from its clients' accounts; and (v) assist with back-office functions, recordkeeping and client reporting.

Fidelity also offers other services intended to help our firm manage and further develop its advisory practice. Such services include, but are not limited to, performance reporting, financial planning, third party research, publications, access to educational conferences, roundtables and webinars, practice management resources, access to consultants and other third party service providers who provide a wide array of business related services and technology with whom EFS may contract directly.

Fidelity generally does not charge its advisor clients separately for custody services but is compensated by account holders through commissions and other transaction-related or asset-based fees for securities trades that are executed through Fidelity or that settle into Fidelity accounts (i.e., transactions fees are charged for certain no-

load mutual funds, commissions are charged for individual equity and debt securities transactions). Fidelity provides access to many no-load mutual funds without transaction charges and other no-load funds at nominal transaction charges.

As a result of receiving such services for no additional cost, we may have an incentive to continue to use or expand the use of Fidelity's services. We examined this potential conflict of interest when we chose to enter into the relationship with Fidelity and have determined that the relationship is in the best interests of EFS' clients and satisfies our client obligations, including our duty to seek best execution. A client may pay a commission that is higher than another qualified broker-dealer might charge to effect the same transaction where we determine in good faith that the commission is reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including the value of research provided, execution capability, commission rates, and responsiveness. Accordingly, while EFS will seek competitive rates, to the benefit of all clients, we may not necessarily obtain the lowest possible commission rates for specific client account transactions. Although the investment research products and services that may be obtained by us will generally be used to service all of our clients, a brokerage commission paid by a specific client may be used to pay for research that is not used in managing that specific client's account.

Investment advisors may elect to purchase or sell the same securities for several clients at approximately the same time when they believe such action may prove advantageous to clients. This process is referred to as aggregating orders, batch trading or block trading. EFS does not generally engage in block trading. It should be noted that implementing trades on a block or aggregate basis may be less expensive for client accounts; however, it is our trading policy is to implement all client orders on an individual basis. Therefore, we do not aggregate or "block" client transactions. Considering the types of investments we hold in advisory client accounts, we do not believe clients are hindered in any way because we trade accounts individually. This is because we develop individualized investment strategies for clients and holdings will vary. Our strategies are primarily developed for the long-term and minor differences in price execution are not material to our overall investment strategy.

In instances where we may engage in block trading, we will distribute a portion of the shares to participating accounts in a fair and equitable manner. The distribution of the shares purchased is typically proportionate to the size of the account, but it is not based on

account performance or the amount or structure of management fees. Subject to our discretion regarding factual and market conditions, when we combine orders, each participating account pays an average price per share for all transactions. In situations where a block order is only partially filled by the executing broker-dealer, we allocate the order to all participating accounts on a pro rata basis.

EFS, as a matter of policy and practice, does not have any formal or informal arrangements or commitments to utilize research, research-related products and other services obtained from broker dealers, or third parties, on a soft dollar commission basis. Soft dollars generally refers to arrangements whereby a discretionary investment adviser is allowed to pay for and receive research, research-related or execution services from a broker dealer or third party provider, in addition to the execution of transactions, in exchange for the brokerage commissions from transactions for client accounts.

It is the policy of EFS that in all circumstances involving trade errors, clients are made whole. If the error is the responsibility of EFS, the client transaction will be corrected and EFS will be responsible for any client loss based on an inaccurate or erroneous error.

Item 13 – Review of Accounts

Financial Advisors will periodically monitor advisory accounts and, when appropriate, suggest a reallocation of the portfolio based upon changing economic or market conditions or changes in the client’s individual circumstances. These suggested reallocations will be implemented in discretionary accounts without prior approval or notice to the client.

EFS provides reports to clients based on this periodic review.

Item 14 – Client Referrals and Other Compensation

EFS may pay certain professionals for referrals. The professional who refers the account will receive a portion of the advisory fee but in no case will the client pay more because of the referral fee. The referral fees will be on a cash only basis. The client will be given proper disclosure about the advisory and referral fees. The professional will be either an investment advisor representative or a solicitor of EFS. Any solicitor will be required to execute a solicitor agreement and each client who is a referral from a solicitor must execute an acknowledgment of the solicitor relationship.

In addition, Essex Savings Bank may from time to time pay referral fees to Bank employees which refer customers to EFS. These referral fees are paid one time, in a nominal, fixed amount, and are not dependent upon whether the customer ultimately opens an account with EFS. In addition, the existence of the referral fee program is disclosed to each customer that opens an account. The referral fee program will comply in all respects with the Interagency Statement on Retail Sales of Non-Deposit Investment Products issued by federal bank and thrift regulators.

Item 15 – Custody

The SEC deems an investment adviser to have custody of client assets any time an adviser has access to clients' funds or securities, including when an adviser directly or indirectly holds client assets, has the authority to obtain possession of client assets, or has the ability to appropriate client assets. For these purposes, SEC registered advisers are deemed to have custody based solely on the ability to debit advisory fees or serve as Trustee.

EFS is deemed to have "custody" of client assets because it has arrangements with clients whereby EFS may directly debit advisory fees from Client accounts, and because a related person, Essex Savings Bank, serves as Trustee for certain advisory accounts and is not operationally independent by virtue of the fact that the entities have directors in common. Therefore, it must comply with Rule 206(4)-2 under the Advisers Act (the "Custody Rule"). The Custody Rule requires that such clients' assets be maintained with a Qualified Custodian.

The Custody Rule provides that advisory clients must receive quarterly account statements directly from the Qualified Custodian. EFS has a reasonable belief that account statements are provided to clients by the Qualified Custodian on a monthly basis. Clients should carefully review the statements they receive from the Qualified Custodian and should contact Essex if they are not receiving statements or have other questions.

The SEC issued guidance in 2017 that the use of Standing Letters of Authorization ("SLOAs") to disburse funds to Third Parties may cause an investment adviser to be deemed to have custody of client assets under the Custody Rule. While EFS allows clients to use SLOAs to disburse funds to Third Parties, the recipient of the funds, the amount of funds to be disbursed and the frequency of disbursements are all at the direction of the client. Our custodians have implemented practices that assist EFS in meeting the SEC issued guidance.

Item 16 – Investment Discretion

EFS usually receives 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, EFS observes the investment policies, limitations and restrictions of the clients that it advises. For registered investment companies, EFS's authority to trade securities may also be limited by certain federal securities and tax laws that require diversification of investments and favor the holding of investments once made.

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

Item 17 – Voting Client Securities

As a matter of firm policy and practice, where EFS is the Adviser to an account, it does not have any authority to and does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. Clients will receive applicable proxies directly from the issuer of securities held in clients' investment portfolios. EFS may provide advice to clients regarding the clients' voting of proxies.

EFS does vote proxies for an ERISA account where such action is required by the Plan.

Item 18 – Financial Information

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

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Essex Financial Services, Inc.

176 Westbrook Road
P.O. Box 999
Essex, Connecticut 06426-0999
(860) 767-4300
(800) 900-5972
www.essexfinancialservices.com

Rep Brochure (Part 2B of Form ADV) December 13, 2019

This brochure supplement provides information about the Investment Adviser Representatives of Essex Financial Services, Inc. that supplements the Essex Financial Services, Inc. Firm Brochure. You should have received a copy of that brochure. Please contact Essex Financial Services, Inc. if you did not receive Essex Financial Services, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about the Investment Adviser Representatives of Essex Financial Services, Inc. is available on the SEC's website at www.adviserinfo.sec.gov.

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Item 1**Anthony G. Russo, Vice President**

This brochure supplement provides information about Anthony G. Russo that supplements the Essex Financial Services, Inc. brochure. You should have received a copy of that brochure. Please contact Essex Financial Services, Inc. if you did not receive Essex Financial Services, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Anthony G. Russo is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

Anthony G. Russo, born 1962, received his Bachelors of Arts in 1984 from St. Michael's College.

Mr. Russo has served as a Financial Advisor at Essex Financial Services, Inc. since March of 2010. Before Essex Financial Services, Inc., Mr. Russo was a Financial Advisor at TD Bank North from November of 2009 until March of 2010. Before TD Bank North, Mr. Russo was a Financial Advisor at Bancnorth Investment Group from February of 2001 until November of 2009. Prior to Bancnorth Investment Group, Mr. Russo was a Financial Advisor at Webster Investment from May of 1993 until January of 2001.

Item 3 Disciplinary Information

Mr. Russo has no disciplinary information to report.

Item 4 Other Business Activities

Mr. Russo is a registered representative and insurance agent with Essex Financial Services, Inc., in its capacity as a registered broker dealer and general insurance agency. Mr. Russo sells products and services consistent with those businesses, including securities and insurance policies and receives separate and typical compensation for any brokerage transaction executed or insurance product sold on behalf of Essex Financial Services, Inc.

Item 5 Additional Compensation

Mr. Russo, in his capacity as a registered representative of Essex Financial Services, may receive certain 12(b)-1 fees and other distribution and administrative fees from mutual funds in which client funds are invested.

Item 6 Supervision

Mr. Russo's investment advisory activity is supervised by Michael D. O'Rourke, Chief Compliance Officer of Essex Financial Services, Inc. Mr. O'Rourke can be reached at (860) 767-4300.

Item 1**James M. Sullivan, Vice President, AIF®**

This brochure supplement provides information about James M. Sullivan that supplements the Essex Financial Services, Inc. brochure. You should have received a copy of that brochure. Please contact Essex Financial Services, Inc. if you did not receive Essex Financial Services, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about James M. Sullivan is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

James M. Sullivan, born 1978, received his Bachelor of Arts in 2000 from Assumption College. Mr. Sullivan earned his Accredited Investment Fiduciary® Designation from Fi360 in September 2013.

Mr. Sullivan has served as a Financial Advisor at Essex Financial Services, Inc. since April of 2009. Before Essex Financial Services, Inc. Mr. Sullivan was a Financial Advisor at Strategic Advisors, Inc. from April of 2003 until February of 2009. Prior to Strategic Advisors, Inc., Mr. Sullivan was a Financial Advisor at Fidelity Brokerage Services from January of 2001 until February of 2009. Prior to Fidelity Brokerage Services Mr. Sullivan was a Customer Service Representative at Allmerica Investments, Inc. from August of 1999 until August of 2000.

Item 3 Disciplinary Information

Mr. Sullivan has no disciplinary information to report.

Item 4 Other Business Activities

Mr. Sullivan is a registered representative and insurance agent with Essex Financial Services, Inc., in its capacity as a registered broker dealer and general insurance agency. Mr. Sullivan sells products and services consistent with those businesses, including securities and insurance policies and receives separate and typical compensation for any brokerage transaction executed or insurance product sold on behalf of Essex Financial Services, Inc.

Item 5 Additional Compensation

Mr. Sullivan, in his capacity as a registered representative of Essex Financial Services, may receive certain 12(b)-1 fees and other distribution and administrative fees from mutual funds in which client funds are invested.

Item 6 Supervision

Mr. Sullivan's investment advisory activity is supervised by Michael D. O'Rourke, Chief Compliance Officer of Essex Financial Services, Inc. Mr. O'Rourke can be reached at (860) 767-4300.

Item 1**Stephen W. Bates**

This brochure supplement provides information about Stephen W. Bates that supplements the Essex Financial Services, Inc. brochure. You should have received a copy of that brochure. Please contact Essex Financial Services, Inc. if you did not receive Essex Financial Services, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Stephen W. Bates is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

Stephen W. Bates, born 1947, received his Bachelor of Arts in History in 1969 from Dartmouth College. Mr. Bates then received his MBA in 1974 from the Tuck School of Business.

Mr. Bates has served as a Financial Advisor at Essex Financial Services, Inc. since September of 2008. Before Essex Financial Services, Inc., Mr. Bates served as a Senior Vice President at Bank of America from September 2006 until August of 2008. Prior to working at Bank of America, Mr. Bates was a Director at Mellon Financial Corporation from June 1999 until August 2006.

Item 3 Disciplinary Information

Mr. Bates has no disciplinary information to report.

Item 4 Other Business Activities

Mr. Bates is a registered representative and insurance agent with Essex Financial Services, Inc., in its capacity as a registered broker dealer and general insurance agency. Mr. Bates sells products and services consistent with those businesses, including securities and insurance policies and receives separate and typical compensation for any brokerage transaction executed or insurance product sold on behalf of Essex Financial Services, Inc.

Item 5 Additional Compensation

Mr. Bates, in his capacity as a registered representative of Essex Financial Services, may receive certain 12(b)-1 fees and other distribution and administrative fees from mutual funds in which client funds are invested.

Item 6 Supervision

Mr. Bates' investment advisory activity is supervised by Michael D. O'Rourke, Chief Compliance Officer of Essex Financial Services, Inc. Mr. O'Rourke can be reached at (860) 767-4300.

Item 1**Dave Delfino, CFP[®], CAP[®]**

This brochure supplement provides information about Dave Delfino that supplements the Essex Financial Services, Inc. brochure. You should have received a copy of that brochure. Please contact Essex Financial Services, Inc. if you did not receive Essex Financial Services, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Dave Delfino is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

Dave Richard Delfino, born 1982, received his Bachelor of Arts in 2005 from Eastern Connecticut State University and a Master of Science in Financial Services from American College in 2014. Mr. Delfino also received his Certified Financial Planner Degree in 2016 and his Chartered Advisor in Philanthropy designation in 2015.

Mr. Delfino has served as a Financial Advisor at Essex Financial Services, Inc. since June of 2018. Prior to joining Essex Financial Services, Inc., Mr. Delfino spent over 8 years as a Financial Advisor with Fidelity Investments servicing the Private Client Group.

Item 3 Disciplinary Information

Mr. Delfino has no disciplinary information to report.

Item 4 Other Business Activities

Mr. Delfino has no outside business activities.

Item 5 Additional Compensation

Mr. Delfino is a registered representative and insurance agent with Essex Financial Services, Inc., in its capacity as a registered broker dealer and general insurance agency. Mr. Delfino sells products and services consistent with those businesses, including securities and insurance policies and receives separate and typical compensation for any brokerage transaction executed or insurance product sold on behalf of Essex Financial Services, Inc.

Item 6 Supervision

Mr. Delfino's investment advisory activity is supervised by Michael D. O'Rourke, Chief Compliance Officer of Essex Financial Services, Inc. Mr. O'Rourke can be reached at (860) 767-4300.

Item 1**David C. Donaldson Jr.**

This brochure supplement provides information about David C. Donaldson Jr. that supplements the Essex Financial Services, Inc. brochure. You should have received a copy of that brochure. Please contact Essex Financial Services, Inc. if you did not receive Essex Financial Services, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about David C. Donaldson Jr. is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

David C. Donaldson Jr., born 1952, received a Bachelor of Arts in 1979 from SUNY Purchase and a Master of Business Administration in Finance in 1982 from Fordham University.

Mr. Donaldson has served as a Financial Advisor at Essex Financial Services, Inc. since March of 2010. Before Essex Financial Services, Inc., Mr. Donaldson was a Financial Advisor at TD Bank North from November of 2009 until March of 2010. Before TD Bank North, Mr. Donaldson was a Financial Advisor at Bancnorth Investment Group from May of 2001 until November of 2009. Prior to Bancnorth Investment Group, Mr. Donaldson was a Financial Advisor at Webster Investment from October of 2000 until January of 2001.

Item 3 Disciplinary Information

Mr. Donaldson has no disciplinary information to report.

Item 4 Other Business Activities

Mr. Donaldson is a registered representative and insurance agent with Essex Financial Services, Inc., in its capacity as a registered broker dealer and general insurance agency. Mr. Donaldson sells products and services consistent with those businesses, including securities and insurance policies and receives separate and typical compensation for any brokerage transaction executed or insurance product sold on behalf of Essex Financial Services, Inc.

Item 5 Additional Compensation

Mr. Donaldson, in his capacity as a registered representative of Essex Financial Services, may receive certain 12(b)-1 fees and other distribution and administrative fees from mutual funds in which client funds are invested.

Item 6 Supervision

Mr. Donaldson's investment advisory activity is supervised by Michael D. O'Rourke, Chief Compliance Officer of Essex Financial Services, Inc. Mr. O'Rourke can be reached at (860) 767-4300.

Item 1**Jeb N. Embree**

This brochure supplement provides information about Jeb N. Embree that supplements the Essex Financial Services, Inc. brochure. You should have received a copy of that brochure. Please contact Essex Financial Services, Inc. if you did not receive Essex Financial Services, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Jeb N. Embree is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

Jeb N. Embree, born 1940, received his Bachelor of Arts in 1963 from Hobart College.

Mr. Embree has served as a Financial Advisor at Essex Financial Services, Inc. since November of 2003. Before Essex Financial Services, Inc., Mr. Embree was a Financial Advisor at John W. Rafal and Associates, Inc. from 2002 until November of 2003. Prior to John W. Rafal and Associates, Inc., Mr. Embree was a Registered Representative at Tucker Anthony from 1994 until 2002.

Item 3 Disciplinary Information

Mr. Embree has no disciplinary information to report.

Item 4 Other Business Activities

Mr. Embree is a registered representative with Essex Financial Services, Inc., in its capacity as a registered broker dealer. Mr. Embree sells securities and receives separate and typical compensation for any brokerage transaction executed on behalf of Essex Financial Services, Inc.

Item 5 Additional Compensation

Mr. Embree, in his capacity as a registered representative of Essex Financial Services, may receive certain 12(b)-1 fees and other distribution and administrative fees from mutual funds in which client funds are invested.

Item 6 Supervision

Mr. Embree's investment advisory activity is supervised by Michael D. O'Rourke, Chief Compliance Officer of Essex Financial Services, Inc. Mr. O'Rourke can be reached at (860) 767-4300.

Item 1**Sean F. Flynn**

This brochure supplement provides information about Sean F. Flynn that supplements the Essex Financial Services, Inc. brochure. You should have received a copy of that brochure. Please contact Essex Financial Services, Inc. if you did not receive Essex Financial Services, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Sean F. Flynn is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

Sean Francis Flynn, Born 1982, received his Bachelor of Science Degree in Finance from the Dolan School of Business at Fairfield University April 2005.

Mr. Flynn has served as a Financial Advisor with Essex Financial Services since March 2017. Before Essex Financial Services, Inc., Mr. Flynn was an Investment Advisor Representative at Symmetry Partners/Apella Capital LLC from May 2013 until March 2017. Mr. Flynn was a Financial Advisor with Merrill Lynch, Pierce, Fenner & Smith Inc. from December 2010 until May 2013.

Mr. Flynn is also a Certified College Planning Specialist (CCPS) through the National Institute of Certified College Planners.

Item 3 Disciplinary Information

Mr. Flynn has no disciplinary information to report.

Item 4 Other Business Activities

Mr. Flynn is not engaged in any other business activities.

Item 5 Additional Compensation

Mr. Flynn does not receive any additional compensation.

Item 6 Supervision

Mr. Flynn's investment advisory activity is supervised by Michael D. O'Rourke, Chief Compliance Officer of Essex Financial Services, Inc. Mr. O'Rourke can be reached at (860) 767-4300.

Item 1**Anthony J. Fortuna**

This brochure supplement provides information about Anthony J. Fortuna that supplements the Essex Financial Services, Inc. brochure. You should have received a copy of that brochure. Please contact Essex Financial Services, Inc. if you did not receive Essex Financial Services, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Anthony J. Fortuna is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

Anthony J. Fortuna, born 1976, received his Bachelor of Science in Finance in 1999 from Central Connecticut State University.

Mr. Fortuna has served as a Financial Advisor at Essex Financial Services, Inc. since May of 2011. Before Essex Financial Services, Inc., Mr. Fortuna was a Financial Advisor at Nutmeg Securities, LLC from June of 2009 until May of 2011. Before Nutmeg Securities, Mr. Fortuna was a Financial Advisor at TD Bank North from January of 2007 until April of 2009. Prior to TD Bank North, Mr. Fortuna was an Associate Financial Advisor at Ameriprise from December of 2006 until January of 2007. Prior to Ameriprise, Mr. Fortuna was an Associate Financial Advisor at Advest, Inc. from September of 1998 until December of 2005.

Item 3 Disciplinary Information

Mr. Fortuna has no disciplinary information to report.

Item 4 Other Business Activities

Mr. Fortuna is a registered representative and insurance agent with Essex Financial Services, Inc., in its capacity as a registered broker dealer and general insurance agency. Mr. Fortuna sells products and services consistent with those businesses, including securities and insurance policies and receives separate and typical compensation for any brokerage transaction executed or insurance product sold on behalf of Essex Financial Services, Inc.

Item 5 Additional Compensation

Mr. Fortuna, in his capacity as a registered representative of Essex Financial Services, may receive certain 12(b)-1 fees and other distribution and administrative fees from mutual funds in which client funds are invested.

Item 6 Supervision

Mr. Fortuna's investment advisory activity is supervised by Michael D. O'Rourke, Chief Compliance Officer of Essex Financial Services, Inc. Mr. O'Rourke can be reached at (860) 767-4300.

Item 1**W. Timothy Furgueson**

This brochure supplement provides information about W. Timothy Furgueson that supplements the Essex Financial Services, Inc. brochure. You should have received a copy of that brochure. Please contact Essex Financial Services, Inc. if you did not receive Essex Financial Services, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about W. Timothy Furgueson is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

W. Timothy Furgueson, born 1968, received his Bachelor of Arts in Sociology in 1993 from Roanoke College

Mr. Furgueson has served as a Financial Advisor at Essex Financial Services, Inc. since June of 2011. Before Essex Financial Services, Inc., Mr. Furgueson was a Financial Advisor at Middlecove Capital/Purshe Kaplan Sterling from April of 2010 until June of 2011. Before Middlecove Capital/Purshe Kaplan Sterling, Mr. Furgueson was a Financial Advisor at Morgan Stanley Smith Barney from June of 2009 until March of 2010. Prior to Morgan Stanley Smith Barney, Mr. Furgueson was a Financial Advisor at Citigroup Global Markets, Inc. from January of 1994 until March of 2010.

Item 3 Disciplinary Information

Mr. Furgueson has no disciplinary information to report.

Item 4 Other Business Activities

Mr. Furgueson is a registered representative and insurance agent with Essex Financial Services, Inc., in its capacity as a registered broker dealer and general insurance agency. Mr. Furgueson sells products and services consistent with those businesses, including securities and insurance policies and receives separate and typical compensation for any brokerage transaction executed or insurance product sold on behalf of Essex Financial Services, Inc.

Item 5 Additional Compensation

Mr. Furgueson, in his capacity as a registered representative of Essex Financial Services, may receive certain 12(b)-1 fees and other distribution and administrative fees from mutual funds in which client funds are invested.

Item 6 Supervision

Mr. Furgueson's investment advisory activity is supervised by Michael D. O'Rourke, Chief Compliance Officer of Essex Financial Services, Inc. Mr. O'Rourke can be reached at (860) 767-4300.

Item 1**Kristin Green, AIF®**

This brochure supplement provides information about Kristin Green that supplements the Essex Financial Services, Inc. brochure. You should have received a copy of that brochure. Please contact Essex Financial Services, Inc. if you did not receive Essex Financial Services, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Kristin Green is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

Kristin Green, born 1983, attended the University of South Florida. Ms. Green earned her Accredited Investment Fiduciary® Designation from Fi360 in December 2018.

Ms. Green has served as a Financial Advisor and Client Relationship Manager at Essex Financial Services, Inc. since March of 2014. Before Essex Financial Services, Inc., Ms. Green worked at Fidelity Investments as a licensed Relationship Manager in the Private Client Group, from November 2012 until March of 2014, and as a Bank branch manager with Citizens Bank from November 2009 until November 2012, and Bank branch manager with Bank of America from May 2003 until November 2009.

Item 3 Disciplinary Information

Ms. Green has no disciplinary information to report.

Item 4 Other Business Activities

Ms. Green is a registered representative and insurance agent with Essex Financial Services, Inc., in its capacity as a registered broker dealer and general insurance agency. Ms. Green sells products and services consistent with those businesses, including securities and insurance policies and receives separate and typical compensation for any brokerage transaction executed or insurance product sold on behalf of Essex Financial Services, Inc.

Item 5 Additional Compensation

Ms. Green, in her capacity as a registered representative of Essex Financial Services, may receive certain 12(b)-1 fees and other distribution and administrative fees from mutual funds in which client funds are invested.

Item 6 Supervision

Ms. Green's investment advisory activity is supervised by Michael D. O'Rourke, Chief Compliance Officer of Essex Financial Services, Inc. Mr. O'Rourke can be reached at (860) 767-4300.

Item 1**Jere Jordan**

This brochure supplement provides information about Jere Jordan that supplements the Essex Financial Services, Inc. brochure. You should have received a copy of that brochure. Please contact Essex Financial Services, Inc. if you did not receive Essex Financial Services, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Jere Jordan is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

Jere Jordan, born 1955, received her Bachelor of Business Administration in 1978 from the University of Georgia

Ms. Jordan has served as a Financial Advisor with Essex Financial Services, Inc. since February of 2013. Before Essex Financial Services, Inc., Ms. Jordan was a Registered Representative with LPL Financial LLC from October of 2011 to February of 2013. Before LPL, Ms. Jordan was a Registered Representative with Uvest Financial Services Group from March of 2003 to October of 2011.

Item 3 Disciplinary Information

Ms. Jordan has no disciplinary information to report.

Item 4 Other Business Activities

Ms. Jordan is a registered representative and insurance agent with Essex Financial Services, Inc., in its capacity as a registered broker dealer and general insurance agency. Ms. Jordan sells products and services consistent with those businesses, including securities and insurance policies and receives separate and typical compensation for any brokerage transaction executed or insurance product sold on behalf of Essex Financial Services, Inc.

Item 5 Additional Compensation

Ms. Jordan, in her capacity as a registered representative of Essex Financial Services, may receive certain 12(b)-1 fees and other distribution and administrative fees from mutual funds in which client funds are invested.

Item 6 Supervision

Ms. Jordan's investment advisory activity is supervised by Michael D. O'Rourke, Chief Compliance Officer of Essex Financial Services, Inc. Mr. O'Rourke can be reached at (860) 767-4300.

Item 1**David F. LaMay, CFP®**

This brochure supplement provides information about David F. LaMay that supplements the Essex Financial Services, Inc. brochure. You should have received a copy of that brochure. Please contact Essex Financial Services, Inc. if you did not receive Essex Financial Services, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about David F. LaMay is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

David F. LaMay, born 1957, received his Bachelor of Science in Financial Management in 1991 from Franklin Pierce University and his Master of Business Administration in 1999 from the University of Connecticut. Mr. LaMay received his Certified Financial Planner™ Degree in 2006 from the College of Financial Planning.

Mr. LaMay has served as a Financial Advisor at Essex Financial Services, Inc. since March of 2010. Before Essex Financial Services, Inc., Mr. LaMay was a Financial Advisor at Fidelity Brokerage Services LLC from October of 1999 until March of 2010.

Item 3 Disciplinary Information

Mr. LaMay has no disciplinary information to report.

Item 4 Other Business Activities

Mr. LaMay is a registered representative and insurance agent with Essex Financial Services, Inc., in its capacity as a registered broker dealer and general insurance agency. Mr. LaMay sells products and services consistent with those businesses, including securities and insurance policies and receives separate and typical compensation for any brokerage transaction executed or insurance product sold on behalf of Essex Financial Services, Inc.

Item 5 Additional Compensation

Mr. LaMay, in his capacity as a registered representative of Essex Financial Services, may receive certain 12(b)-1 fees and other distribution and administrative fees from mutual funds in which client funds are invested.

Item 6 Supervision

Mr. LaMay's investment advisory activity is supervised by Michael D. O'Rourke, Chief Compliance Officer of Essex Financial Services, Inc. Mr. O'Rourke can be reached at (860) 767-4300.

Item 1**Michael R. LaRiviere, CFP®**

This brochure supplement provides information about Michael R. LaRiviere that supplements the Essex Financial Services, Inc. brochure. You should have received a copy of that brochure. Please contact Essex Financial Services, Inc. if you did not receive Essex Financial Services, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Michael R. LaRiviere is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

Michael R. LaRiviere, born 1978, received his Bachelor of Science in Business Administration in 2000 from the University of Connecticut. Mr. LaRiviere became a CERTIFIED FINANCIAL PLANNER™ through the Certified Financial Planner Board of Standards in December 2016.

Mr. LaRiviere has served as a Financial Advisor at Essex Financial Services, Inc. since August 2013. Before Essex Financial Services, Inc., Mr. LaRiviere was a Financial Advisor at Fidelity Brokerage Services LLC from June 2000 until July 2013.

Item 3 Disciplinary Information

Mr. LaRiviere has no disciplinary information to report.

Item 4 Other Business Activities

Mr. LaRiviere is a registered representative and insurance agent with Essex Financial Services, Inc., in its capacity as a registered broker dealer and general insurance agency. Mr. LaRiviere sells products and services consistent with those businesses, including securities and insurance policies and receives separate and typical compensation for any brokerage transaction executed or insurance product sold on behalf of Essex Financial Services, Inc.

Item 5 Additional Compensation

Mr. LaRiviere, in his capacity as a registered representative of Essex Financial Services, may receive certain 12(b)-1 fees and other distribution and administrative fees from mutual funds in which client funds are invested.

Item 6 Supervision

Mr. LaRiviere's investment advisory activity is supervised by Michael D. O'Rourke, Chief Compliance Officer of Essex Financial Services, Inc. Mr. O'Rourke can be reached at (860) 767-4300.

Item 1**Robert J. Marcinek, CFP®**

This brochure supplement provides information about Robert J. Marcinek that supplements the Essex Financial Services, Inc. brochure. You should have received a copy of that brochure. Please contact Essex Financial Services, Inc. if you did not receive Essex Financial Services, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Robert J. Marcinek is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

Robert J. Marcinek, born 1956, received his Bachelor of Arts (Economics) from the University of Connecticut in 1979 and received his Master of Business Administration from The Wharton School at the University of Pennsylvania in 1984. Mr. Marcinek has served as a CERTIFIED FINANCIAL PLANNER™ practitioner since 2002.

Mr. Marcinek has served as a Financial Advisor at Essex Financial Services, Inc. since July 2013. Prior to joining Essex Financial Services, he served as a Wealth Planning Advisor at Sagemark Consulting / Lincoln Financial Advisors from November 2002 until July 2013.

Item 3 Disciplinary Information

Mr. Marcinek has no disciplinary information to report.

Item 4 Other Business Activities

Mr. Marcinek is a registered representative and insurance agent with Essex Financial Services, Inc., in its capacity as a registered broker dealer and general insurance agency. Mr. Marcinek sells products and services consistent with those businesses, including securities and insurance policies and receives separate and typical compensation for any brokerage transaction executed or insurance product sold on behalf of Essex Financial Services, Inc.

Item 5 Additional Compensation

Mr. Marcinek, in his capacity as a registered representative of Essex Financial Services, may receive certain 12(b)-1 fees and other distribution and administrative fees from mutual funds in which client funds are invested.

Item 6 Supervision

Mr. Marcinek's investment advisory activity is supervised by Michael D. O'Rourke, Chief Compliance Officer of Essex Financial Services, Inc. Mr. O'Rourke can be reached at (860) 767-4300.

Item 1**Nathaniel Morris, JD**

This brochure supplement provides information about Nathaniel Morris that supplements the Essex Financial Services, Inc. brochure. You should have received a copy of that brochure. Please contact Essex Financial Services, Inc. if you did not receive Essex Financial Services, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Nathaniel Morris is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

Nathaniel Morris, born 1985, received his Bachelor of Arts in Political Science and Economics from Saint Joseph's University in 2008 and a Juris Doctor from Temple University School of Law in 2011.

Mr. Morris has served as a Financial Advisor at Essex Financial Services, Inc. since June 2013. Prior to joining Essex Financial Services, Inc., Mr. Morris was a Financial Advisor with ING Financial Partners, Inc. from January 2012 to May 2013.

Item 3 Disciplinary Information

Mr. Morris has no disciplinary information to report.

Item 4 Other Business Activities

Mr. Morris is a registered representative and insurance agent with Essex Financial Services, Inc., in its capacity as a registered broker dealer and general insurance agency. Mr. Morris sells products and services consistent with those businesses, including securities and insurance policies and receives separate and typical compensation for any brokerage transaction executed or insurance product sold on behalf of Essex Financial Services, Inc.

Item 5 Additional Compensation

Mr. Morris, in his capacity as a registered representative of Essex Financial Services, may receive certain 12(b)-1 fees and other distribution and administrative fees from mutual funds in which client funds are invested.

Item 6 Supervision

Mr. Morris' investment advisory activity is supervised by Michael D. O'Rourke, Chief Compliance Officer of Essex Financial Services, Inc. Mr. O'Rourke can be reached at (860) 767-4300.

Item 1**Nicholas L. Naumann**

This brochure supplement provides information about Nicholas L. Naumann that supplements the Essex Financial Services, Inc. brochure. You should have received a copy of that brochure. Please contact Essex Financial Services, Inc. if you did not receive Essex Financial Services, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Nicholas L. Naumann is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

Nicholas L. Naumann, born 1989, received his Bachelor of Science Degree in Business Management from Seton Hall University's Stillman School of Business in 2011.

Mr. Naumann has served as a Financial Advisor at Essex Financial Services, Inc. since November 2018. Prior to joining Essex Financial, Mr. Naumann was a Financial Advisor with Fidelity Investments' Private Client Group in Fairfield, Connecticut from 2011 to 2018.

Item 3 Disciplinary Information

Mr. Naumann has no disciplinary information to report.

Item 4 Other Business Activities

Mr. Naumann is a registered representative and insurance agent with Essex Financial Services, Inc., in its capacity as a registered broker dealer and general insurance agency. Mr. Naumann sells products and services consistent with those businesses, including securities and insurance policies and receives separate and typical compensation for any brokerage transaction executed or insurance product sold on behalf of Essex Financial Services, Inc.

Item 5 Additional Compensation

Mr. Naumann, in his capacity as a registered representative of Essex Financial Services, may receive certain 12(b)-1 fees and other distribution and administrative fees from mutual funds in which client funds are invested.

Item 6 Supervision

Mr. Naumann's investment advisory activity is supervised by Michael D. O'Rourke, Chief Compliance Officer of Essex Financial Services, Inc. Mr. O'Rourke can be reached at (860) 767-4300.

Item 1**Kevin J. Nolan, CFP®**

This brochure supplement provides information about Kevin J. Nolan that supplements the Essex Financial Services, Inc. brochure. You should have received a copy of that brochure. Please contact Essex Financial Services, Inc. if you did not receive Essex Financial Services, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Kevin J. Nolan is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

Kevin J. Nolan, born 1971, received his Bachelor of Arts in Economics in 1994 from the University of New Hampshire. Mr. Nolan received his MBA from Fordham University in 2006.

Mr. Nolan has served as a Financial Advisor at Essex Financial Services, Inc. since March 2014. Before Essex Financial Services, Inc., Mr. Nolan was a Senior Advisor at Sontag Advisory from August 2011 until March 2014. Prior to Sontag Advisory Mr. Nolan he was a Senior Advisor with Fidelity Investments from February 1995 until July 2011.

Item 3 Disciplinary Information

Mr. Nolan has no disciplinary information to report.

Item 4 Other Business Activities

Mr. Nolan has no outside business activities.

Item 5 Additional Compensation

Mr. Nolan receives no additional compensation.

Item 6 Supervision

Mr. Nolan's investment advisory activity is supervised by Michael D. O'Rourke, Chief Compliance Officer of Essex Financial Services, Inc. Mr. O'Rourke can be reached at (860) 767-4300.

Item 1**A. Ned Rogin, LLB**

This brochure supplement provides information about A. Ned Rogin that supplements the Essex Financial Services, Inc. brochure. You should have received a copy of that brochure. Please contact Essex Financial Services, Inc. if you did not receive Essex Financial Services, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about A. Ned Rogin is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

A. Ned Rogin, born 1942, received his Bachelor of Arts in 1964 from University of Pennsylvania. Mr. Rogin then received his Bachelor of Laws in 1968 from Boston University.

Mr. Rogin has served as a Financial Advisor at Essex Financial Services, Inc. since November of 2003. Before Essex Financial Services, Inc., Mr. Rogin was a Financial Advisor at John W. Rafal and Associates, Inc. from March of 1999 until November of 2003.

Item 3 Disciplinary Information

Mr. Rogin has no disciplinary information to report.

Item 4 Other Business Activities

Mr. Rogin is a registered representative with Essex Financial Services, Inc., in its capacity as a registered broker dealer. Mr. Rogin sells securities and receives separate and typical compensation for any brokerage transaction executed on behalf of Essex Financial Services, Inc.

Item 5 Additional Compensation

Mr. Rogin, in his capacity as a registered representative of Essex Financial Services, may receive certain 12(b)-1 fees and other distribution and administrative fees from mutual funds in which client funds are invested.

Item 6 Supervision

Mr. Rogin's investment advisory activity is supervised by Michael D. O'Rourke, Chief Compliance Officer of Essex Financial Services, Inc. Mr. O'Rourke can be reached at (860) 767-4300.

Item 1**William Tait, CFP®**

This brochure supplement provides information about William Tait that supplements the Essex Financial Services, Inc. brochure. You should have received a copy of that brochure. Please contact Essex Financial Services, Inc. if you did not receive Essex Financial Services, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about William Tait is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

William Tait, born 1970, received his Bachelor of Science in Business Administration from Western New England College in 1994. Mr. Tait received a Master of Business Administration from the University of Hartford's Barney School of Business in 1998. Mr. Tait became a CERTIFIED FINANCIAL PLANNER™ through the Certified Financial Planner Board of Standards in November 2015.

Mr. Tait has served as a Financial Advisor at Essex Financial Services, Inc. since June 2016. Prior to Essex Financial Services Inc., Mr. Tait was a Financial Area Manager for HP Financial Services from July 1, 2008 through May 31, 2016.

Item 3 Disciplinary Information

Mr. Tait has no disciplinary information to report.

Item 4 Other Business Activities

Mr. Tait is a registered representative and insurance agent with Essex Financial Services, Inc., in its capacity as a registered broker dealer and general insurance agency. Mr. Tait sells products and services consistent with those businesses, including securities and insurance policies and receives separate and typical compensation for any brokerage transaction executed or insurance product sold on behalf of Essex Financial Services, Inc.

Item 5 Additional Compensation

Mr. Tait, in his capacity as a registered representative of Essex Financial Services, may receive certain 12(b)-1 fees and other distribution and administrative fees from mutual funds in which client funds are invested.

Item 6 Supervision

Mr. Tait's investment advisory activity is supervised by Michael D. O'Rourke, Chief Compliance Officer of Essex Financial Services, Inc. Mr. O'Rourke can be reached at (860) 767-4300.