

Schedule F Attachment:

Item of Form (identify)	Answer
1	<p>LotusGroup Advisors, LLC. (“LotusGroup”) provides investment advisory & portfolio management services for private clients through a Full Trading Authorization and / or a Limited Power of Attorney (LotusGroup does not have custody of client funds). All funds are held in client’s own account and client authorizes invoices to be paid from their account.</p> <p>Clients undergo an introductory interview to outline their financial situation and to help LotusGroup set risk tolerance and investment objectives. Clients are categorized into one of six categories: aggressive, moderate-aggressive, moderate, conservative-moderate, conservative and ultra-conservative. LotusGroup then provides strategic asset allocation, rebalancing, technical protection, and sector re-weighting services on an ongoing basis within client portfolios, selecting assets based on both the client’s risk categorization and market conditions. Under this model, the typical investments include ETFs, closed-end funds, and open-ended funds across a broad base of different asset classes: US stocks, US bonds, Foreign stock, Foreign bonds, Emerging Markets, Raw Materials, Energy, Precious Metals, REITs, etc. Both fundamental and technical analyses are used to select individual positions, while volatility-determined trailing stops are used to help determine the exit price. Money management principles are applied to limit the exposure of a client’s portfolio to the effects of any single investment.</p> <p>LotusGroup meets with clients periodically to review their financial situation, answer questions, and determine if any adjustments need to be made relative to their financial objectives, risk tolerance, and time horizon.</p> <p>LotusGroup provides the above services on an outsourced basis, performing daily management activities without client consultation. Specifically, LotusGroup provides:</p> <ol style="list-style-type: none"> 1. Account setup assistance with a selected Broker / Custodian. 2. Development of a personalized savings & investment program. 3. Discretionary selection of specific investments within the program. 4. Periodic adjustment of the asset allocation model per client category. 5. Administration of portfolio rebalancing as needed. 6. Asset reductions during major market swings above or below technical support levels (only for clients with managed assets > \$150K). 7. Production and distribution of individual quarterly performance reports. 8. Production and distribution of periodic client newsletters.

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	<p>Fee Schedule is as follows (non-negotiable):</p> <table> <tr> <th><u>Assets Under Mgmt</u></th><th><u>Incremental % Fee Charged Per Annum</u></th></tr> <tr> <td>On the first \$250 K*</td><td>2.50%</td></tr> <tr> <td>The next \$250 K</td><td>2.00%</td></tr> <tr> <td>The next \$250 K</td><td>1.50%</td></tr> <tr> <td>The next \$250 K</td><td>1.00%</td></tr> <tr> <td>In excess of \$1.0 MM</td><td>0.75%</td></tr> </table> <p>* Clients may be able to find competing advisory services at lower fees.</p> <p>Fees are billed in advance at the beginning of each calendar quarter based on current assets under management prior to the open on the first day of the quarter and deducted mid-quarter on the 45th day of the quarter. For the first quarter, the billing statement is prorated based on the client start date. Client start date is the date the contract is signed by both parties. However, management fees are not charged until the first day when funds arrive in the client's account(s). Upon account closure (at will by either party), prorated fees will be returned to client based on the day funds are withdrawn from Advisor's supervision.</p> <p>Advisory Fees are automatically deducted by LotusGroup from the Client's account. Client authorizes the payment of invoice. In all cases, the Client receives an invoice from LotusGroup prior to the withdrawal. Invoices are sent to clients at the beginning of each quarter. The Custodian also sends monthly account statements to the Client with the management fee transaction displayed in the month it is withdrawn. Midway through the quarter, LotusGroup sends the invoices to the custodian for withdrawal of fees.</p>	<u>Assets Under Mgmt</u>	<u>Incremental % Fee Charged Per Annum</u>	On the first \$250 K*	2.50%	The next \$250 K	2.00%	The next \$250 K	1.50%	The next \$250 K	1.00%	In excess of \$1.0 MM	0.75%
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5	<p>In addition to being appropriately registered as an Investment Advisor in the appropriate jurisdictions, LotusGroup places a high value on the following areas:</p> <ul style="list-style-type: none"> • Client Service & Human Psychology • Market Knowledge (experience investing in bull and bear markets) • Macro/Micro Economic Knowledge (domestically and internationally) • Business Experience and Competitive Market Theory • Financial Analysis and Understanding of Corporate Filings • Statistical Modeling and Systems Development • Real-World Experiences 												
6	<p>LotusGroup Advisors and Andy Seth are licensed as Life Insurance Producers. As part of the Contingency Planning process, LGA conducts an Insurance Needs Analysis to provide clients with a recommended level of coverage both in terms of value and length of term for life insurance. LGA will also procure life insurance on behalf of the client to find high quality life insurance at low costs. LGA will walk the client through the application process to have a policy underwritten and then delivers the policy to the client.</p>												

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7	<p>Investment Advisor Education / Business Background</p> <p><u>Name:</u> Raphael Martorello (Investment Advisor Representative)</p> <p><u>D.O.B:</u> March 8, 1974</p> <p><u>Degree:</u> B.S. Mechanical Engineering / Minor in Economics University of Virginia, 1997</p> <p><u>Business:</u> Partner / Advisor, Martorello Money Management: 2004 – Present Partner / Advisor, LotusGroup Advisors: Present</p> <ul style="list-style-type: none"> • 6 years of commercial investment experience • 7 years of prior personal experience and system development • Registered as an Investment Advisor Representative <p>Director, ICG Commerce: 2000 – 2005</p> <ul style="list-style-type: none"> • Practice responsibility for all West Coast clients • Management oversight for 20 employees • Business Process Outsourcing <p>Associate, A.T. Kearney: 1997 – 2000</p> <ul style="list-style-type: none"> • Management / Business Consultant
7	<p><u>Name:</u> Andleib “Andy” Seth (Investment Advisor Representative)</p> <p><u>D.O.B:</u> May 10, 1978</p> <p><u>Degree:</u> B.A. Economics and B.A. Spanish Boston College, 2000</p> <p><u>Business:</u> Partner / Advisor, LotusGroup Advisors: 2007 – Present</p> <ul style="list-style-type: none"> • Founded in January, 2007 • 9 years of Client Services experience • 5 years of Operations experience • Registered as an Investment Advisor Representative • Licensed as a Life Insurance Producer (CO #213445) <p>Manager, ICG Commerce: 2001 – 2008</p> <ul style="list-style-type: none"> • Client responsibility for US and foreign clients • Management oversight for 20 employees • Business Process Outsourcing <p>Consultant, Accenture: 2000 – 2001</p>

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	<ul style="list-style-type: none"> • Management / Business Consultant
7	<p><u>Name:</u> Gregory R. Schowe (Investment Advisor Representative)</p> <p><u>D.O.B:</u> February 9th, 1978</p> <p><u>Degree:</u> B.A. Business Administration University of Oregon, 2000</p> <p><u>Business:</u> Advisor, LotusGroup Advisors: 2007 – Present</p> <ul style="list-style-type: none"> • 8 years of Client Services experience • 7 years of custom solution design experience • Registered as an Investment Advisor Representative <p>Owner / Senior Analyst, Schowe & Associates, 2006 - 2009</p> <ul style="list-style-type: none"> • Lead team in worldwide business system implementation • Explore extensive business and system requirements • Develop comprehensive custom solution for Clients <p>Senior Analyst, Strategic Vision Consulting: 2004 – 2006</p> <ul style="list-style-type: none"> • Custom business system design and implementation <p>Analyst, Plutus Enterprises: 2000 - 2004</p> <ul style="list-style-type: none"> • System design and testing
7	<p><u>Name:</u> Rachel Moody (Investment Advisor Representative)</p> <p><u>D.O.B:</u> August 7, 1978</p> <p><u>Degree:</u> B.S. Commerce University of Virginia, 2000</p> <p><u>Business:</u> Advisor, LotusGroup Advisors: Present</p> <ul style="list-style-type: none"> • Joined in July, 2008 • 9 years of financial services experience • Registered as an Investment Advisor Representative <p>Marketing Director, Barclaycard US: 2005 – Present</p> <ul style="list-style-type: none"> • Created and marketed credit card products to customers based on individual needs • Lead strategy for team of 20 marketing support staff <p>Marketing Manager, Providian Financial 2000 – 2005</p> <ul style="list-style-type: none"> • Lead testing and implementation of marketing initiatives for financial service customers

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8	<p>Raphael Martorello is an owner and advisor representative in the company Martorello Money Management, Inc. (LGA). LGA was founded in 2007 with similar goals to LGA and the same investment approach. Raphael Martorello is in charge of investment strategy and manages client services and order execution. Services offered are similar to LGA and the fee schedule is identical. Conflicts of interest have been mitigated by using the identical investment strategy, making decisions outside of market hours, and executing orders independently between the two firms.</p>
9	<p>The Partners / Investment Advisor Representatives of LotusGroup (“IARs”), Raphael Martorello and Andy Seth, actively make investments / trades in securities for their personal portfolios which may be similar to those made on behalf of LotusGroup clients. Mr. Martorello and Mr. Seth believe in their investment methodology, and employ those same strategies in their own investments.</p> <p>LotusGroup maintains an asset list of potential options by asset class. The options are constantly evaluated, and then used as new money from existing or new clients is deployed. This asset list is not shared publicly or distributed to clients. The specific positions are determined through a combination of independent analysis and purchased research. LotusGroup does not collect any commissions, informal benefits, or other such incentives to influence the selection of any particular security.</p> <p>On the sell side, a value stop or trailing stop for each position is employed based on average volatility and technical charting. These stops are tracked daily for each client and for each individual investment assets to ensure that risks are minimized relative to potential gains. Sales are made when the closing price for the position is above the value stop or below the trailing stop at the close of market on a given day. Certain other system rules apply as well, such as, tightening or loosening a trailing stop, and increasing or decreasing a position size. All rules are followed for client portfolios as well as for the personal portfolios of LotusGroup’s IARs. Additionally, trades are made in block transactions through the selected Broker/Custodian to ensure conflicts of interest are mitigated between the IAR’s and their clients.</p> <p>Occasionally, Mr. Martorello takes positions in more risky investments such as individual micro-cap stocks, options, and private investments (e.g. real estate projects, oil exploration interests, etc.). Additionally, Mr. Martorello periodically tests new trading strategies in his personal accounts. These research activities are inappropriate for LotusGroup’s clients and are limited to Mr. Martorello’s personal account. As new strategies are validated, they may be shared with customers to evaluate their appropriateness and the client’s willingness to incorporate them into their personal investment objectives.</p>

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	<p>Client trades and interests are always placed ahead of those of LotusGroup IARs. Additionally, a preferred Broker / Custodian is chosen with each client and this party has the responsibility for effective execution of trades placed.</p>
10	<p>LotusGroup's minimum asset requirement for new clients is \$150,000. There are no ongoing contribution requirements although this practice is highly recommended for ongoing savings, asset allocation, and tax efficiency purposes. At its discretion, LotusGroup will make an exception to the above requirements.</p> <p>Please see response to Item #1 above for description of services available by asset class:</p> <ul style="list-style-type: none"> • < \$125K at Custodian: Asset Allocation, Rebalancing • > \$125K at Custodian: Above Services + Technical VS/TS Protection
12	<p>LGA is only required to maintain or solicit the consent of customers for trades made on positions that were specifically discussed during the introductory interview (e.g. inherited stock that the client would like to hold onto for sentimental reasons, etc.).</p> <p>LGA clients sign a full trading authorization agreement through the broker / dealer. LGA clients sign a limited power of attorney for 401K, 403B, 457, and 529 accounts. LGA has the discretion to select, buy, sell, and determine the quantities of the individual positions for each client account. If a client objects to any particular investment decision, he / she may discuss this with LGA and a mutually agreed upon decision will be made and documented if necessary. It is always preferred that the client and LGA engage in a discussion to resolve any potential differences in opinion. However, if client repeatedly acts in a manner inconsistent with the mutually agreed upon investment objectives, LGA reserves the right to cancel the customer agreement after providing written counsel to the customer. Similarly, the customer reserves the right to cancel their contract with LGA at any time if they so desire.</p> <p>LGA suggests that clients use the LGA-preferred Broker-Dealer for maintaining funds under management with LGA. Both retirement and non-retirement accounts are setup and maintained for customers with the Broker-Dealer. LGA strives to maintain a consistent trading, reporting, and investment operation that is facilitated through the usage of a single Broker-Dealer.</p> <p>The preferred Broker-Dealer was selected using the following criteria:</p> <ul style="list-style-type: none"> • Trading commissions costs • Customer service levels • Reporting tools, including cost basis and 1099 reports to help facilitate tax management strategies • Personal money management tools <ul style="list-style-type: none"> - Electronic fund transfer capabilities

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	<ul style="list-style-type: none"> - Dividend reinvestment programs - Electronic communication delivery capabilities • Financial security / stability to insure individual accounts, including primary and back-up account insurance <p>Generally, in addition to a broker's ability to provide "best execution," we may also consider the value of "research" or additional brokerage products and services a broker-dealer has provided or may be willing to provide. This is known as paying for those services or products with "soft dollars" or credits. Because many of the services or products could be considered to provide a benefit to the firm, and because the "soft dollars" used to acquire them are generated from clients transactions fees, the firm could be considered to have a conflict of interest in allocating client brokerage business: it could receive valuable benefits by selecting a particular broker or dealer to execute client transactions and the transaction compensation charged by that broker or dealer might not be the lowest compensation the firm might otherwise be able to negotiate. In addition, the firm could have an incentive to cause clients to engage in more securities transactions than would otherwise be optimal in order to generate brokerage compensation with which to acquire products and services.</p> <p>LGA has chosen TD Ameritrade Institutional as its preferred-broker dealer, and participates in the TD Ameritrade Institutional program. TD Ameritrade Institutional is a division of TD Ameritrade, Inc. ("TD Ameritrade") member FINRA/SIPC. TD Ameritrade is an unaffiliated SEC-registered broker-dealer and FINRA member. TD Ameritrade offers to independent investment advisors services which include custody of securities, trade execution, clearance and settlement of transactions. Adviser receives some benefits from TD Ameritrade through its participation in the program.</p> <p>As referenced above, the firm's use of soft dollars is intended to comply with the requirements of Section 28(e) of the Securities Exchange Act of 1934. Section 28(e) provides a "safe harbor" for investment managers who use commissions or transaction fees paid by their advised accounts to obtain investment research services that provide lawful and appropriate assistance to the manager in performing investment decision-making responsibilities. As required by Section 28(e), the firm will make a good faith determination that the amount of commission or other fees paid is reasonable in relation to the value of the brokerage and research services provided. That is, before placing orders with a particular broker, we generally determine, considering all the factors described below, that the compensation to be paid to TD Ameritrade is reasonable in relation to the value of all the brokerage and research products and services provided by TD Ameritrade. In making this determination, we typically consider not only the particular transaction or transactions, and not only the value of brokerage and research services and products to a particular client, but</p>

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	<p>also the value of those services and products in our performance of our overall responsibilities to all of our clients. In some cases, the commissions or other transaction fees charged by a particular broker-dealer for a particular transaction or set of transactions may be greater than the amounts another broker-dealer who did not provide research services or products might charge.</p> <p>Notwithstanding the above disclosures, LGA acts with a fiduciary responsibility to its clients as a Registered Investment Advisor. LGA participates in broker-dealer programs, as described above, with the aim of providing better tools, technologies, and services to its clients, oftentimes tools and services that are required to deliver the exceptional value promised and provided to clients, and for which are not available to a retail client on their own. As an example, these products or services assist LGA in managing and administering client accounts not maintained at TD Ameritrade (e.g. 401Ks, 529s, Annuities, etc.) and are often ignored by other investment advisors, to the detriment of full client financial planning. Consequently, these technologies and services are critical for LGA to provide the services contracted for with clients. Furthermore, despite our required disclosures above, we have independently benchmarked industry services and fees and believe that TD Ameritrade offers an exceptional total value for the commission charged on each transaction relative the services it provides, as compared to its industry's peers.</p> <p>For 401K, 403B, 457, and 529 accounts under management, LGA client accounts remain with their company- or state-sponsored plan (e.g. Fidelity, Franklin, etc.), but the data is incorporated into the overall asset allocation model and is also included in their LGA-developed quarterly performance report.</p>
13	<p>LGA utilizes various trading and portfolio management technologies from our preferred brokerage firm (TD Ameritrade Institutional) and their related third-party technology and service provider partners, without cost or at a discount. These technologies and services facilitate the management of client accounts, trading, compliance, investment research, customer relationship management, and tax reporting. TD Ameritrade may also have paid for business consulting and professional services received by LGA. Furthermore, some of the products and services made available by TD Ameritrade may solely benefit LGA and not benefit the client. These products or services further assist LGA in managing and administering client accounts not maintained at TD Ameritrade (e.g. 401Ks, 529s, etc.). These technologies and services may not be commercially available for retail clients to use, and are critical for LGA to provide the services contracted for with clients.</p> <p>The benefits received by LGA from TD Ameritrade do not depend on the amount of brokerage transactions directed to TD Ameritrade. Additionally, LGA endeavors at all times to put the interests of its clients first, in compliance with its fiduciary duties as a Registered Investment Advisor. However, while no financial compensation is provided, the use of these technologies and services</p>

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	<p>qualifies as the receipt of an economic benefit, and clients should be aware that the receipt of these benefits may create a potential conflict of interest in influencing the choice of TD Ameritrade for custody and brokerage services.</p> <p>LGA thanks current clients for referring a new client by offering a one-time credit of \$200 toward their future quarterly fees. The new client must meet the following criteria:</p> <ul style="list-style-type: none"> (1) Meets our total portfolio minimum to become a client (2) Remains a client for a minimum of six months