

TIS Group, Inc. Disclosure Brochure



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This brochure provides information about the qualifications and business practices of TIS Group, Inc. If you have any questions about the contents of this brochure, please contact us at one of the above phone numbers or email us at tis@tisgroup.net. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about TIS Group is available on the SEC's website at <http://www.adviserinfo.sec.gov>.

MATERIAL CHANGES

Since The Last Annual Update Of This Brochure
We Have Made The Following Material Changes:

Added Products:

Deep PM Discount

Splitrock Conservative

Unconventional

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ITEM 4. ADVISORY BUSINESS

Firm Description and History of Business

Founded in 1995 by Larry Jeddeloh, TIS Group provides investment research and asset management services to clients in the U.S., Europe, and Asia.

TIS Group has four principal institutional research services. The *Market Intelligence Report* is a daily e-mail which covers broad geopolitical and market themes, currency trends, commodities, interest rates, economic analysis, identification of early change, new trends, and macro investment ideas.

The other principal research services are monthly publications covering the *U.S. Markets* and *Global Markets*, *TIS Macro Thematic Reports*, and the *Frontline China* service. Additional topics covered

include asset allocation, thematic work, country reviews and analysis, and in-depth coverage of the U.S., European, and Asian equity, currency and bond markets. TIS Group's Macro-Thematic Reports focus on specific macro topics. Past reports have focused on natural gas, the climate and agricultural commodities. *Frontline China* covers the Chinese economy, politics, and general market trends.

TIS Group manages money for clients in several distinct products. The bulk of TIS Group's assets under management are under contract from families, foundations, pensions, and private accounts. Most assets are managed on a separate account basis.

Principal Owners

LARRY E. JEDDELOH. Larry is the Editor of The Institutional Strategist and Managing Director and Founder of TIS Group in Minneapolis, which advises institutions, hedge funds, mutual funds, and family offices in the areas of asset allocation, geonomics, and investment strategy. Mr. Jeddeloh owns 59.5% of TIS Group.

ROBERT A. LEPLEY, PH.D. - Dr. Lepley joined TIS Group during 2000 as an owner and managing director. Dr. Lepley owns 10.5% of TIS Group.

Types of Advisory Services

TIS Group provides investment advisory services primarily focusing on global equities, bonds, cash, and currencies. Investment strategies range from a conservative, income-oriented investment style to high-risk styles, targeting higher returns. The investment style utilized depends on the individual client's objectives.

The approximate percentages of total advisory billings are from the following services:

- 11.00% investment supervisory services;
- 89.00% periodicals issued about securities by subscription.

TIS Group publishes the *Institutional Strategist*, a monthly publication, and the *Market Intelligence Report*, a daily e-mail service. These publications cover geonomics, global equity, biomedical markets, interest rates, market themes, and currency trends. Subscription fees for these publications are generally priced from \$10,000 - \$25,000 annually, but fees can run higher. Those prices may vary depending upon the geographical location of the client, the amount of servicing the client requires and the number of individuals within an institution who are being serviced. Fees are negotiable and certain discounts may apply to new or existing clients. Fees are

payable on a monthly, quarterly, semi-annual or annual basis, at the client's discretion. Fees are payable when billed. Service is often started prior to billing. No refunds are available; however, the subscription can be cancelled at any time by the client.

TIS Group's *Macro-Thematic Reports* focus on specific macro topics. Past reports have focused on natural gas, the climate and agricultural commodities.

TIS Group launched its *Frontline China Report* in early 2012, an institutional research product, produced in co-operation with Ian Stones (Beijing) and Simon Hunt (London). This report is especially applicable for hedge funds, global macro funds, global equity/credit managers, family offices, Asia-specific managers, corporations and any firm which views China as integral to the global economy/capital markets/commodities

Certain of the securities mentioned in TIS Group's Market Intelligence Reports and Institutional Strategist books may be purchased or sold by TIS Group for its asset management clients concurrently or shortly after the reports are sent to clients and prospective clients.

Tailored Relationships

Under normal circumstances, TIS Group requires a minimum account size of \$100k. From time-to-time, TIS Group may accept accounts of smaller value on a case-by-case basis.

Clients may impose restrictions on the investment manager in terms of structuring of the client's portfolio.

Wrap Fees

TIS Group does not sponsor or participate in any wrap fee arrangements for its services.

Discretionary and Non-Discretionary Clients

As of December 31, 2015, TIS Group client assets totaled approximately \$49,860,913 on a discretionary basis, and approximately \$92,525,357 on a non-discretionary basis.

ITEM 5. FEES AND COMPENSATION

Description

Advisory services are provided on the following fee schedule. Fees are negotiable and may vary from the schedule below.

The rates below apply unless a different rate schedule is agreed upon and confirmed in a written signed contract between TIS Group, Inc. and the client. In addition, from time to time, TIS Group may waive a portion of the fees it charges to a client based upon that client's circumstances and investments.

EQUITY AND BALANCED PORTFOLIOS

<i>Billed at</i>	
1. Accounts less than \$250,000	2.00%
2. Accounts equal to or greater than \$250,000 and less than \$2,000,000	1.50%
3. Accounts equal or greater than \$2,000,000	
Next \$3,000,000	1.00%
Next \$5,000,000	0.75%
4. Greater than \$10,000,000	Negotiable

FIXED INCOME PORTFOLIOS

<i>Billed at:</i>	
1. Accounts less than \$2,000,000	1.00%
2. Accounts equal or greater than \$2,000,000	
Next \$3,000,000	0.80%
Next \$5,000,000	0.50%
3. Greater than \$10,000,000	Negotiable

Fee, Deductions and Terminations

Management fees are charged based upon the per annum rates included in the above table, and are calculated against the total account balance thresholds and ranges specified in the table. A flat management fee is negotiable, at the client's request. With the exception of the first quarter of assets under management, management fees are billed quarterly, in advance. TIS Group may modify the above rates on thirty (30) days advance notice to the client.

Clients can elect to have TIS Group deduct management fees directly from their account by authorizing their custodian to pay those fees directly from their account. These directives are standing orders and can be terminated by either informing TIS Group or their custodian. Clients who do not elect to have fees directly deducted are billed via invoice.

A client may terminate an investment advisory contract by providing 30 days written notice to TIS Group and receive a pro-rata refund.

There is no expiration date on the investment advisory agreement. Sub-advisory clients are charged per the sub-advisory contract. In the event of a significant withdrawal or deposit by a client during the quarter, TIS Group reserves the right to pro-rate the asset management fee for the quarter.

Refunds are calculated in a prorated manner in the quarter of termination by taking the remaining days in a quarter divided by the total days in a quarter and multiplying that ratio by the entire quarter's fee originally collected.

Types of Fees/Expenses

From time to time, a portion of the assets held in a client's account may be invested in mutual funds, ETF's, ETN's or other pooled investment structures. In these instances, clients will be indirectly paying additional management fees – the normal and customary fees paid to TIS Group, and indirectly, the management fee paid to the advisor of the fund or pool, which fee is included in the fund's net

asset value calculations. Additionally, client assets may be invested in a fund or pool for which TIS Group or an affiliate may serve as investment manager. In such an event, TIS Group will waive fees charged to the client to the extent required to avoid dual fees.

Please refer to pages 11 thru 13 of this document for complete broker fee information.

Compensation for Sales of Securities

TIS Group does not allow its supervised persons to receive any outside source of compensation for the sale of securities on behalf of a client.

ITEM 6. PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

Group currently does not have any investment advisory contract that provides for performance-based fees or side-by-side management.

ITEM 7. TYPES OF CLIENTS

- TIS Group provides investment management services to the following types of clients:
 - a. Individuals/families
 - b. Pension and profit sharing plans

- c. Trusts, estates, charitable organizations, foundations
- d. Corporations or business entities other than those listed above
- TIS Group generally requires a minimum of \$100K for opening an account. TIS Group maintains the right to accept accounts of smaller value on a case-by case basis.

ITEM 8. METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

Investment Selection Process—TIS Group is primarily a top-down investment manager. Top down investing involves the identification of major global themes and the construction of trades to execute on the major trends. When a theme is identified, opportunities in the theme are researched and selected for the portfolio based on a combination of fundamental and technical factors. Macro-oriented themes drive the portfolios.

In some investment strategies, we may be short or long. Clients should be prepared to bear losses and in our products, volatility can be high.

A. Aggressive Long Term Growth

Overview—TIS Group's Aggressive Long Term Growth portfolio is managed with the goal of out performing the Russell 2000 Index.

The product targets long-term returns by investing in growth stocks, growth oriented mutual funds (foreign and domestic), ETF's, ETN's and any interest which the manager believes will generate long term capital gains.

Strengths

- Not sector neutral.
- Themes and individual holdings may be concentrated.
- A key element of the product is the focus on income generating strategies which are utilized on a tactical basis.
- Willingness to back performance expectations with performance oriented management contract.
- Supported by TIS Group global research.

Weaknesses

- Sector & Country overweights may leave portfolio open to exogenous shock or underperformance.

The Portfolio may use ETFs, which can be defined as derivatives, including commodity ETFs, market inverse ETFs, and ETFs which replicate the return or be leveraged 2x-3x of the performance of a defined index.

Periodically the Aggressive Long-Term Growth composite may also hold positions up to 100% in ETF's which reflect the price or performance in other currencies.

The extent of leverage used in this composite is in the form of ETFs/ETNs. This portfolio may use ETFs/ETNs, which can be defined as being comprised of or replicate stock or bond indexes, derivatives, including commodity or currency markets. These ETFs/ETNs can replicate the return (1x) or be leveraged (2x-3x) of the performance of a defined underlying instrument or they attempt to replicate the inverse of the return at 1x, 2x or 3x the performance. At any given time as the manager deems as an appropriate position, the Targeted Income & Growth composite may hold positions up to 100% in the above types. This composite regularly invests in various types of ETFs/ETNs.

B. Capital Income Protection

Overview—Our Capital Income Protection (CapPro) product is a global, yield-focused, primarily-equity strategy. TIS Group has been managing money in this style since 1995.

This product utilizes principally a mix of global, multi-cap stocks and cash designed to provide returns above the cash rate, on a long-term basis. Capital preservation through sound stock selection practices, including selecting high dividend yield stocks, and performance which exceeds the rate of return on cash are its principal objectives, although neither can be assured. As with substantially all investments, an investment in CapPro involves a risk of losing all or a portion of one's investment.

Characteristics

- Portfolio invested globally.
- Long only, absolute return focused.
- Income-oriented global equity-focused portfolio.
- Emphasis on high yield stocks which are growing their dividends.
- All capitalization sizes are used.
- No natural shorts, no options are used. Long positions in ETF's which correspond to the inverse of the performance of a market index are used from time-to-time.
- When we are negative on equities, we go to cash/government bonds, or TIS Group buys ETF's which correspond to the inverse of the performance of a market index.

Selection Process

- Global equities generally have the following criteria:
- Stocks' Dividend Yield greater than the S&P 500 Dividend Yield.
- Stocks with dividend growth greater than the CPI.
- Stocks are analyzed for rising stream of Cash Flow—this eliminates stocks whose dividends are paid out of asset sales, financings, declining cash flows.
- Technical Analysis—Qualifying stocks are reviewed for stable technical pattern.
- The bulk of equities chosen for portfolio inclusion meet these criteria at the time of purchase. The portfolio also has historically had a growth-oriented component. The maximum growth component is 20% of the portfolio.

Portfolio Construction Process

- **When Buys are Executed:** Policy up through Q4 2013: From the list of qualifying stocks, initial positions of up to 5% of the portfolio are made, depending on liquidity and attractiveness of the stock. Policy as of Q1 2014 and forward: There is no limit on size of initial positions.
- **When Sales Are Made:** Sales are made when dividend yields fall significantly, i.e. from a stock's price appreciation, when dividends are cut, when TIS Group's fundamental view of a company changes, or a technical pattern is violated.
- **Macro Overlay:** Our invested position is overlaid by the availability of qualifying stocks and our view of managing market risk.

C. Concentrated Growth & Income (Concentrated G&I)

Overview—TIS Group's Concentrated Growth & Income portfolio is managed with the goal of outperforming the MSCI Daily Total Return Gross World Index.

The product targets returns using a combination of income generating assets such as dividend paying stocks, bonds, ETF's, ETN's, MLP's royalty trusts and mutual funds. The growth component may consist of stocks, ETF's ETN's MLP's, mutual funds and commodities.

Characteristics:

- This product invests in income producing strategies as well as growth opportunities. Both the growth and income portions of the portfolio are concentrated and invested globally.
- When we are negative on equities, we can go to cash/government bonds, or we can buy ETF's which

correspond to the inverse of the performance of a market index.

Strengths

- Not sector neutral.
- Themes and individual holdings may be concentrated.
- A key element of the product is the focus on income generating strategies which are utilized on a tactical basis.
- Willingness to back performance expectations with performance oriented management contract.
- Supported by TIS Group global research.

Weaknesses

- Sector & Country overweights may leave portfolio open to exogenous shock or underperformance.

D. Research Plus

Overview—TIS Group manages this portfolio generally in line with its global research recommendations. As a research firm, TIS Group has long maintained a Global model portfolio. In the Spring of 2005, the model portfolio went live, when a client asked TIS Group to manage an account similar to our research model. This portfolio, whose holdings include the majority of our Global model research recommendations plus additional tactical ideas, is the result.

Our investment approach is focused on top-down, non-consensus, timely analysis designed to call major "turns" as well as identifying various forms of global risks. Our goal is to identify future market leadership, market themes, and individual investment opportunities.

TIS Group's Research Plus portfolio is managed with the goal of outperforming the MSCI Daily Total Return Gross World Index.

Selection Process

- TIS Group is primarily a top-down investment manager. Identification of major global themes and the construction of trades to execute on the major trends, is what we do.
- When a theme is identified, opportunities in the theme are researched and selected for the portfolio based on a combination of fundamental and technical factors. Macro-oriented themes drive the portfolio.

- When we are negative on equities, we can go to cash/government bonds, or we can buy ETF's which correspond to the inverse of the performance of a market index

Strengths

- Not sector neutral.
- Themes and individual holdings may be concentrated.
- Uses TIS Group's best ideas.
- Willingness to back performance expectations with performance oriented management contract.
- Supported by TIS Group global research.

Weaknesses

- Sector & Country overweights may leave portfolio open to exogenous shock or underperformance.

Characteristics:

- Not sector neutral.
- Themes and individual holdings may be concentrated.
- Equities, Bonds, Fx, ETF's and ETN's are used.
- Sector & Country overweights may leave portfolio open to exogenous shock or underperformance.
- The risk of losing all or part of an investment exists.
- The portfolio may include long and short positions.
- Transaction costs may impact the product's performance.

E. Global Non Dollar (formerly Global Asset Allocation)

Overview—TIS Group's Global Non-Dollar strategy invests globally, can be long or short and emphasizes instruments which benefit from a decline in the U.S. Dollar. Those instruments may include non-Dollar equities and bonds, commodity ETF's and ETN's and non-dollar currency. This product should benefit from periods of U.S. Dollar weakness and can experience negative returns during periods of U.S. Dollar strength.

This product allocates between multiple asset classes. Stocks, bonds, cash, other assets may be allocated on a global basis. The risk of loss of principal is present, foreign currencies, and precious metals instruments. Stocks, bonds, cash, ETF's and ETN's are used as well as Put: Call option spreads on the S&P 500 ETF Index (SPY).

Strengths

- Benefits during periods of U.S. Dollar weakness.
- Not sector neutral.
- ETFs allow alternative asset classes.
- Some portfolios will invest in inverse & leveraged ETFs.
- Holdings may be concentrated.
- Allows cash as a holding, including non-U.S. Dollar cash
- Willingness to back performance expectations with performance oriented management contract.
- Supported by TIS Group global research.

Weaknesses

- Sector & Country overweights may leave portfolio open to exogenous shock or underperformance.
- Concentrated portfolios may be volatile.

- Investing in inverse and leveraged ETF's can increase volatility.

- Performance can be negative during periods of U.S. Dollar strength.

F. Targeted Growth & Income

Overview—TIS Group's Targeted Growth & Income portfolio is managed with the goal of outperforming the blended benchmark of the MSCI Daily Total Return Gross World Index, Citigroup Govt Bond Index and 90-Day U.S. T Bill Index.

Selection Process

- TIS Group is primarily a top-down investment manager. Identification of major global themes and the construction of trades to execute on the major trends, is what we do.
- This product invests in income producing strategies as well as growth opportunities. Both the growth and income portions of the portfolio are concentrated and invested globally.
- When we are negative on equities, we can go to cash/government bonds, or we can buy ETF's which

correspond to the inverse of the performance of a market index.

Strengths

- Not sector neutral.
- Themes and individual holdings may be concentrated.
- A key element of the product is the focus on income generating strategies which are utilized on a tactical basis.
- Willingness to back performance expectations with performance oriented management contract.
- Supported by TIS Group global research.

Weaknesses

- Sector & Country overweights may leave portfolio open to exogenous shock or underperformance.

G. Splitrock Explorer

Overview—This composite may invest in up to 10 ETFs &/or cash. It can use inverse ETFs &/or leveraged ETFs which can increase volatility. Its goal is to outperform the MSCI World Total Return Index.

This composite utilizes a top down approach, which focuses on trends such as economic, political, fiscal, monetary policies, demographic and credit. ETF selections are based on a combination of fundamental and technical factors. Additionally this composite can take advantage of perceived temporary market inefficiencies or special situations.

Splitrock Explorer is not sector neutral, holdings may be concentrated which can be volatile. Overweights in ETFs may leave portfolio open to exogenous shock or

underperformance. is composed of all TIS Group discretionary accounts using ETFs & cash to outperform the MSCI World Total Return Index in USD.

Characteristics:

- Not sector neutral.
- ETFs allow alternative asset classes.
- May invest in inverse & leveraged ETFs.
- Holdings may be concentrated.
- Allows cash as a holding.
- Sector & Country overweights may leave portfolio open to exogenous shock or underperformance.
- Concentrated portfolios may be volatile.
- Investing in inverse and leveraged ETF's can increase or decrease loss volatility.

H. Splitrock Aggressive

Overview—TIS Group manages this product based on what is called "top-down" analysis. This means that the first step in analyzing potential investments comes from a macro-view of worldwide trends in economics, politics, demographics, markets, etc... (This differs from a "bottom-up" analysis, which begins its approach by looking first at the securities themselves.) After completing this process, analysis of the individual securities begins within the favored areas. A "top-down" approach is generally more subjective than an objective bottom-up approach.

Strategy

Up to 5 ETFs &/or cash. Can use inverse or leveraged ETFs. Goal is to outperform the MSCI All Country World Total Return Index.

Strengths

- Not sector neutral.
- ETFs allow alternative asset classes.
- Some portfolios will invest in inverse & leveraged ETFs.
- Holdings may be concentrated.
- Willingness to back performance expectations with performance oriented management contract.
- Supported by TIS Group global research.
- Allows cash as a holding.

Weaknesses

- Sector & Country overweights may leave portfolio open to exogenous shock or underperformance.
- Concentrated portfolios may be volatile.
- Investing in inverse and leveraged ETF's can increase volatility.

This analysis often leads to less diversification within a portfolio. Lack of diversification increases risk within a portfolio. Overweighted exposure to certain sectors, industries, stocks, countries, currencies, asset classes, or commodities leads to risk of exogenous shock to one of these areas.

This strategy invests only in exchange-traded funds or "ETFs," which are pooled-investment funds that trade on stock exchanges. The ETFs themselves are invested in a variety of securities, including stocks, bonds, currencies, commodities, and derivatives. Since ETFs are funds, they charge fees, which represent additional costs to your portfolio.

Risks inherent in this investment strategy include loss of capital, manager fees, ETF fees, brokerage fees, taxes on trading gains, and taxes on gains within the funds themselves. The strategy tends to own only 2-4 ETFs at any one time. This can lead to a heavy concentration in certain sectors or markets, which represents risk through a lack of diversification.

This strategy gives the portfolio manager the flexibility to sell all or a portion of the portfolio, holding those assets in cash for a period of time. The risk inherent in this tenant is that your portfolio may not have full exposure to the market at all

times. This may benefit performance in bad markets, or hurt performance in good markets.

I. Splitrock Summa

Overview—TIS Group manages this portfolio generally in line with its global research recommendations. Our approach in this product is to identify future market leadership, market themes, and individual investment opportunities. The product will generally hold between 10 and 20 securities at any given time. The product's investment goal is to provide a combination of income and moderate growth with a priority on limiting volatility. TIS Group's Splitrock Summa portfolio objective is to produce performance that exceeds the rate of return on cash on a long-term basis using a mix of cash, bonds, commodity ETF's and global multi-cap stocks and other ETF's/ETN's. Macro-oriented themes drive the portfolio. The product is globally orientated, can be long or short and invested in a broad range of securities.

Selection Process

- TIS Group uses top-down & thematic research.
- Top down research focuses on trends in economics, politics, fiscal and monetary policy, demographics, and credit. When a theme is identified, ETF opportunities in the theme are identified, researched and selected for the

strategy based on a combination of fundamental and technical factors.

- Additionally, the Splitrock Summa strategy can take advantage of perceived temporary market inefficiencies or special situations.

Strengths

- Global approach that is not sector or country neutral.
- ETFs allow investment in alternative asset classes.
- May invest in inverse & leveraged ETFs to increase returns or reduce volatility (hedge).
- Willingness to back performance expectations with performance oriented management contract.
- Supported by TIS Group global research.
- Allows cash as a holding

Weaknesses

- Sector & Country overweights may leave portfolio open to exogenous shock or underperformance.
- Using inverse and leveraged ETFs to hedge can cause underperformance in rising markets.

J. Splitrock Moderate

Overview—TIS Group manages this product based on what is called "top-down" analysis. This means that the first step in analyzing potential investments comes from a macro-view of worldwide trends in economics, politics, demographics, markets, etc... (This differs from a "bottom-up" analysis, which begins its approach by looking first at the securities themselves.) After completing this process, analysis of the individual securities begins within the favored areas. A "top-down" approach is generally more subjective than an objective bottom-up approach. This analysis often leads to less diversification within a portfolio. Lack of diversification increases risk within a portfolio. Overweighted exposure to certain sectors, industries, stocks, countries, currencies, asset classes, or commodities leads to risk of exogenous shock to one of these areas.

Risks inherent in this investment strategy include loss of capital, manager fees, ETF fees, brokerage fees, taxes on trading gains, and taxes on gains within the funds themselves. The strategy tends to own only 2-4 ETFs at any one time. This can lead to a heavy concentration in certain sectors or markets, which represents risk through a lack of diversification.

This strategy gives the portfolio manager the flexibility to sell all or a portion of the portfolio, holding those assets in cash for a period of time. The risk inherent in this tenant is that

your portfolio may not have full exposure to the market at all times. This may benefit performance in bad markets, or hurt performance in good markets

Strategy

Up to 5 ETFs &/or cash. Can use inverse or leveraged ETFs. Goal is to outperform a blended benchmark consisting of 50% MSCI All Country World Total Return Index & 50% Citigroup World Government Bond Index.

Strengths

- Not sector neutral.
- ETFs allow alternative asset classes.
- Some portfolios will invest in inverse & leveraged ETFs.
- Holdings may be concentrated.
- Willingness to back performance expectations with performance oriented management contract.
- Supported by TIS Group global research.
- Allows cash as a holding.

Weaknesses

- Sector & Country overweights may leave portfolio open to exogenous shock or underperformance.
- Concentrated portfolios may be volatile.
- Investing in inverse and leveraged ETF's can increase volatility.

K. Splitrock Conservative

Overview—The portfolio manager of this product makes investment and trading decisions based on what is called "top-down" analysis. This means that the first step in analyzing potential investments comes from a macro-view of worldwide trends in economics, politics, demographics, markets, etc. (This differs from a "bottom-up" analysis, which

begins its approach by looking first at the securities themselves.) After completing this process, analysis of the individual securities begins within the favored areas. A "top-down" approach is generally more subjective than an objective bottom-up approach. This analysis often leads to less diversification within a portfolio. Lack of diversification

increases risk within a portfolio. Overweighted exposure to certain sectors, industries, stocks, countries, currencies, asset classes, or commodities leads to risk of exogenous shock to one of these areas.

Risks inherent in this investment strategy include loss of capital, manager fees, ETF fees, brokerage fees, taxes on trading gains, and taxes on gains within the funds themselves. The strategy tends to own only 2-4 ETFs at any one time. This can lead to a heavy concentration in certain sectors or markets, which represents risk through a lack of diversification.

This strategy gives the portfolio manager the flexibility to sell all or a portion of the portfolio, holding those assets in cash for a period of time. The risk inherent in this tenant is that your portfolio may not have full exposure to the market at all times. This may benefit performance in bad markets, or hurt performance in good markets.

Strategy

Up to 5 ETFs &/or cash. Goal is to outperform the Citigroup World Government Bond Index.

Strengths

- Not sector neutral.
- ETFs allow alternative asset classes.
- Some portfolios will invest in inverse & leveraged ETFs.
- Holdings may be concentrated.
- Willingness to back performance expectations with performance oriented management contract.
- Supported by TIS Group global research.
- Allows cash as a holding.

Weaknesses

- Sector & Country overweights may leave portfolio open to exogenous shock or underperformance.
- Concentrated portfolios may be volatile.
- Investing in inverse and leveraged ETF's can increase volatility.

L. Alternative Strategy

Overview—TIS Group Alt Strategy is to outperform the S&P 500 total return on a long-term basis with low volatility and to outperform the MSCI Daily Total Return Gross World Index.

TIS Group Alt Strategy is to achieve double-digit returns on a long-term basis with low volatility.

Characteristics:

- The product utilizes credit spreads on the S&P 500 (SPY). In the future, other index products may be utilized.
- The product trades both put and call credit spreads on SPY, normally utilizing weekly option expirations.
- These credit spreads are sold for a net credit, usually on a weekly basis and closed out on a weekly basis.

- Premiums available to sell on credit spreads vary with the S&P's volatility.
- The product has been able to produce positive returns during periods when S&P returns were positive and negative.

Risks:

- While the product trades spreads, high volatility periods can lead to extreme price movements in the S&P 500 and in the underlying spreads.
- In periods of low volatility, the premiums available to sell are low, generally coinciding with lower returns.
- Liquidity in the option market can be volatile. There is no assurance credit spreads can be entered into or exited, and margin requirements can change on short notice.

M. U.S. Small Cap

Overview—TIS Group's U.S. Small Cap portfolio is a concentrated portfolio, managed with the goal of outperforming the Russell 2000. This strategy uses top-down analysis to invest only in equities. Equities have capital loss risk. The companies the shares represent can potentially go bankrupt, and their shares can be worthless. Stocks (equities) are historically more volatile than other asset classes, such as bonds and cash. This strategy invests in smaller companies (small "capitalizations" or ("cap")). Smaller companies have a greater risk of bankruptcy, and are considered an asset class with more risk. This is considered a "fully-invested" strategy. This means that the portfolio will generally be at least 95% invested on average. This strategy does NOT give the portfolio manager the flexibility to sell all or a portion of the portfolio if he thinks the market will go down.

Investment Philosophy

- The underlying goal of this research is to identify and capitalize on secular supply/demand dislocations affecting sub-sectors of the market. Individual equities are then chosen using qualitative and quantitative factors to pinpoint the companies best positioned to benefit from the market imbalance. The concept places an emphasis on sector/industry selection over stock selection.
- Supply/demand imbalances can result from regulatory intervention, environmental changes, demographic trends, changes in popular opinion, political shifts, technological breakthroughs, demand shifts, supply interruptions, etc.

Strategy

- The strategy implemented in the U.S. Small Cap product attempts to remedy the underlying risk/return weaknesses of both pure-value and pure-growth portfolios.
- Value stocks can be cheap for good reason, and can remain that way for extended periods of time. By identifying potential catalysts for change with the "Market Theme" research, an element of timing is added to a standard "value" strategy.
- "Growth" strategies require a highly-speculative determination regarding the timing of a trend's dissipation or termination. By adding a valuation component, downside risk can be reduced.
- Sometimes the term "GARP" or Growth at a Reasonable Price is used to describe similar strategies

Construction

- Active, long-only, focused equity strategy intended to outperform the Russell 2000 Index.
- Roughly, 20-30 equities held at one time.
- The portfolio is not sector-neutral, and selected sectors may have zero weights and over weightings at times.
- No shorts, no derivatives, no margin used.
- This is a fully-invested product, and the average cash position is less than 5%.
- In the first four years of the composite's history, larger cash positions were sometimes held for short periods

after the sale of equity positions which had significant growth.

- Universe – U.S.-incorporated companies listed on U.S. exchanges with initial market caps between \$50 million and \$1.5 billion.

Buy Discipline

- New buys typically come from “Market Theme” research produced by Andrew Roalstad for TIS Group’s institutional research clients. This is often the first screen in the investment process.
- Fundamental criteria used depend upon the life cycle stage of the identified industry.
- Valuation is generally weighted heavily, with sales growth, earnings growth and stability, low leverage, insider activity,

dividend yield, and geographic segmentation all considered.

Sell Discipline

- Stocks reach/surpass average valuation of peers
- Industry pricing power deteriorates
- Unexpected company-specific news changes underlying fundamental valuation
- Merger/Acquisition changes fundamentals of business or capital structure
- Contrarian opinion becomes majority opinion
- Weakening technical pattern
- Individual equities not allowed to grow past 15% of portfolio.

N. Gold

Overview—TIS Group manages in precious metals equities, precious metals funds, and precious metals ETF’s and ETN’s. It may or may not be fully invested. The product’s return is highly correlated to the gold price, which can be highly volatile. Risk of loss can be substantial. Holdings are often concentrated.

Strengths

- Not sector neutral.
- ETFs allow alternative asset classes.
- Some portfolios will invest in inverse & leveraged ETFs.
- Holdings may be concentrated.

- Allows cash as a holding.
- Willingness to back performance expectations with performance oriented management contract.
- Supported by TIS Group global research.

Weaknesses

- Sector & Country overweights may leave portfolio open to exogenous shock or underperformance.
- Concentrated portfolios may be volatile.
- Investing in inverse and leveraged ETF’s can increase volatility.

O. Precious Metals II

Overview—This product invests in Precious Metals equities, Precious Metals funds, and Precious Metals ETF’s and ETN’s. It may or may not be fully invested. The product’s return is correlated to the gold price, which can be highly volatile. Risk of loss can be substantial. Holdings are often concentrated. This composite has the ability to invest in FX-related investments.

Since ETFs are funds, they charge fees, which represent additional costs to your portfolio. Risks inherent in this investment strategy include loss of capital, manager fees, ETF fees, brokerage fees, taxes on trading gains, and taxes on gains within the funds themselves. This can lead to a heavy concentration in certain sectors or markets, which represents

risk through a lack of diversification. This strategy gives the portfolio manager the flexibility to sell all or a portion of the portfolio, holding those assets in cash for a period of time.

The risk inherent in this tenant is that your portfolio may not have full exposure to the market at all times. This may benefit performance in bad markets, or hurt performance in good markets. Leveraged ETFs may also be used at times, which also increases risk. The strategy also tends to have higher turnover. This means that more frequent trading may drive up brokerage fees.

This strategy may be adversely affected by a higher Dollar and /or high currency volatility.

P. Stifel Composite

Overview—The Stifel Composite invests in equities, mutual funds, and options which trade on U.S. Exchanges, including ADRs. This strategy has the ability to invest in any market capitalization size. Cash holdings may represent any percent of its position. The strategy may invest in any number of positions at any time.

This product invests in income producing strategies as well as growth opportunities. Both the growth and income portions of the portfolio are concentrated and invested globally.

When we are negative on equities, the product can go to cash/government bonds, or we can buy ETF’s which correspond to the inverse of the performance of a market index.

This composite portfolio is managed with the goal of outperforming the S&P 500 Total Return Index.

Strengths

- Not sector neutral.
- Themes and individual holdings may be concentrated.
- A key element of the product is the focus on income generating strategies which are utilized on a tactical basis.
- Supported by TIS Group global research.

Weaknesses

- Sector & Country overweights may leave portfolio open to exogenous shock or underperformance.

Q. Tax-Free Bond

Overview—The Tax-Free Bond Composite includes accounts with holdings primarily consisting of ETFs, ETNs, funds or individual bonds. No hedging or short positions are utilized.

TIS Group's Tax Free Bond portfolio is compared to the goal of outperforming the S&P National Muni Index. Tax Free

Bonds funds, individual bonds and cash may be held in a portfolio.

The investment goal is to generate significant returns above the benchmark, while earning income.

R. Long-Term Roth Growth

Overview—This product targets long-term returns by investing in growth stocks, growth oriented mutual funds (foreign and domestic), ETF's, ETN's, private equity, hedge funds, alternative funds and any interest which the manager believes will generate long term capital gains.

TIS Group's Long Term Roth Growth portfolio is managed with the goal of outperforming the Russell 2000 Total Return Index.

When we are negative on equities, the product can go to cash/government bonds, or we can buy ETF's which correspond to the inverse of the performance of a market index.

S. Deep PM Discount

Overview—This product invests in precious metals equities, precious metals funds, and precious metals ETF's and ETN's, a portion of which are believed be selling at discounts to asset value or anticipated earning power. It may or may not be fully invested. The product's return is highly correlated to the precious metals price, which can be highly volatile. Risk of loss can be substantial. Holdings are often concentrated.

TIS Group's research is global, top-down, and thematic, which lends itself well to the use of ETFs for investing. Using ETFs allows TIS Group to gain investment exposure to a variety of asset classes, both U.S. and global, including equity and sectors indices, currencies, commodities and bonds.

The Deep PM Discount Composite invests primarily in Deep PM Discount/silver instruments, precious metal ETFs, precious metals funds (closed-end and open-end funds), and precious metals mining shares. This product invests globally, ...

it can be long or short and it can move to a 100% cash position. Non-Dollar cash positions and non-Dollar short-term government bonds can be used.

Strengths

- Not sector neutral.
- ETFs allow alternative asset classes.
- Holdings may be concentrated.
- Allows cash as a holding.
- Willingness to back performance expectations with performance oriented management contract.
- Supported by TIS Group global research. ...

Weaknesses

- Sector & Country overweights may leave portfolio open to exogenous shock or underperformance.
- Concentrated portfolios may be volatile.

T. Unconventional Strategy

Overview—Asset allocation drives this product. This composite uses a top-down approach. Focuses on political, monetary policies and technical factors. A broad range of equities, funds, ETFs/ETNs may be used. The composite is not sector neutral. Allocation can be from 100% to 0%

invested. Holdings can be long, short or may be neutral. This product is compared to a custom blended benchmark of the MSCI World ACWI (50%), Citi Global Bond Index (40%), and the 30-day T-Bill index (10%).

ITEM 9. DISCIPLINARY INFORMATION

There have been no legal or disciplinary events that are material to a client's or prospective client's evaluation of the firm's advisory business. No supervised person of TIS Group has been involved in or committed a material disciplinary matter.

ITEM 10. OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS FUNDING MARKETS

Financial Industry Activities

TIS Group has no other affiliations.

ITEM 11. CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

Code of Ethics

TIS Group has adopted a formal Code of Ethics. The purpose of the Code of Ethics is to reinforce the fiduciary principles that govern the conduct of this firm and its personnel. Each TIS Group employee is advised to act in the best interest of clients, avoid any

real or potential conflicts of interest, and conduct their personal activities with the utmost integrity.

To this end, TIS Group has distributed a Code of Ethics to each supervised person of the firm. The following is a summary of the policies outlined in the Code of Ethics:

- Standards of business conduct
- Compliance with federal securities laws required
- Personal securities transactions of certain persons must be reviewed and, in some cases, pre-approved by supervisory personnel of TIS Group.

- It is possible TIS Group employees, subject to the Code of Ethics may purchase the same securities recommended in its publications or those purchased/owned by TIS Group's asset management clients.
- Obligation to report violations and enforcement of sanctions
- Annual employee certification required

Anyone who wishes to review the entire Code of Ethics is entitled to do so. In order to obtain a copy, submit a written request to TIS Group.

Participation or Interest in Client Transactions

From time to time, TIS Group may buy or sell for itself securities that it also recommends to clients.

From time to time, TIS Group may buy securities from a client and/or may sell a security it owns to a client.

TIS Group may also recommend to clients that they buy or sell securities or investment products in which TIS Group has some

financial interest. In each of the above circumstances, TIS Group will be subject to conflicts of interest. TIS Group has implemented policies and procedures to assure that such conflicts are managed and that the client's best interests are always paramount to the interests of TIS Group.

ITEM 12. BROKERAGE PRACTICES

TIS Group does not receive products or services directly from brokers other than soft dollar credit generated by trade execution.

TD Ameritrade: TIS Group participates in the institutional TIS Group program (the "Program") offered by TD Ameritrade Institutional. TD Ameritrade Institutional is a division of TD Ameritrade, Inc., member FINRA/SIPC/NF A ("TD Ameritrade"),

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. TIS Group receives some benefits from TD Ameritrade through its participation in the Program. (Please see the disclosure under Item 14 below.)

Selecting Brokerage Firms

TIS Group does business with brokers who operate on either a discretionary or a non-discretionary basis. Discretionary broker/custodians (those giving us the flexibility to trade away from them) are selected on a best execution and best commission/ best admin basis. The performance of these brokers is reviewed regularly and re-direction of trades is the result of this evaluation process.

Selection of brokers is determined by the evaluation of the services provided by broker-dealers, the quality of executions, research, commission rates, and overall brokerage relationships, among other things.

Best Execution

TIS Group has formed an Investment Practices Committee which meets regularly to evaluate the quality of the brokers' trade executions. The Committee is comprised of the Chief Investment Officer, Portfolio Manager, and Head Trader. Evaluations of brokers are performed periodically. Ratings are assigned according to the Committee's evaluation and future trading volumes are generally allotted to brokers according to these ratings.

Factors TIS Group considers when choosing an executing broker:

- | | |
|---------------------------------|-------------------------------------|
| 1. Quality of trade execution | 4. Quality of settlement process |
| 2. Low commission rate | 5. Ability to work difficult orders |
| 3. Quality of research provided | |

Soft Dollars Credits

TIS Group has entered into arrangements with certain broker/dealers wherein the broker sets aside a percentage of its brokerage commissions generated through trades with TIS Group and allows TIS Group to utilize those sums to pay for research. The credits set aside by the broker are known in the industry as soft dollar credits. Soft dollar credit is generated by some client transactions at certain brokers in order to pay for research.

TIS Group receives a direct benefit from its soft dollar arrangements because it is able to obtain research and other eligible products and services that it would otherwise have to provide or purchase for itself from its own resources.

By executing transactions with certain brokers, the broker may provide an incentive in the generation of soft dollar credit. These brokers are evaluated by TIS Group's Investment Practices Committee.

The commissions paid on transactions made on behalf of TIS Group clients, may be higher than an execution-only broker would charge, as allowed under the SEC's safe harbor provision for soft dollars.

Soft dollar credits are used to purchase services and products that help in the decision making process of managing all client accounts. Accordingly, client accounts whose securities are traded through brokers that have soft dollar relationships with TIS Group are

indirectly paying for research services that benefit not only themselves, but also other TIS Group clients whose trading is not effected through brokers with soft dollar arrangements.

Brokers may provide TIS Group with products that help in the decision making process of managing client accounts.

Examples of these products acquired are:

- Electronic real-time quotation systems
- First and third party research reports – Items bought with soft dollars include exchange fees for receipt of market data such as equities, fixed income, options, data terminals, economic advisory services, market pricing service, and market research.
- These reports include global economic advisory investment strategy, technical analysis of stocks/bonds/Fx/ commodities, market theme research and country-related economic/political research.

Since these items are used by TIS Group in its operations as well as for research and money management, clients should note the potential conflicts of interest. Client commission dollars should only be used to directly benefit client accounts through research and money management. To this end, TIS Group has documented the proportions of these items used for research and money management and only uses soft dollars for this portion. The process used to identify these proportions involves user survey and usage estimates.

From time-to-time, TIS Group and its affiliates may enter into transactions that may create actual or potential conflicts of interest between such persons and their respective clients or shareholders. It is the Company's policy not to enter into such relationships if they are reasonably likely to cause circumstances that are not in the clients' best interests. From time-to-time, TIS Group may send the client notice of particular conflicts of interest transactions to ensure that the client is fully informed about any actual or potential conflicts of interest.

Decisions to execute transactions at brokers which generated soft dollar credits are made for reasons such as favorable evaluation of those brokers, unavailable execution services with client custodian, access to certain markets.

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." 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 client assets, 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.

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 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.

Research and Brokerage Products and Services. "Research" products and services we may receive from broker-dealers may include economic surveys, data, and analyses; financial publications; recommendations or other information about particular companies and industries (through research reports and otherwise); and other products or services (e.g., computer services and equipment, including hardware, software, and data bases) that provide lawful and appropriate assistance to the firm in the performance of its investment decision-making responsibilities. Consistent with Section 28(e), brokerage products and services (beyond traditional execution services) consist primarily of computer services and software that permit us to effect securities transactions and perform functions incidental to transaction execution. We generally use such products and services in the conduct of our investment decision making generally, not just for those accounts whose commissions may be considered to have been used to pay for the products or services.

Other Uses and Products. The firm may use some products or services not only as "research" and as brokerage (i.e., to assist in making investment decisions for clients or to perform functions incidental to transaction execution) but for our administrative and other purposes as well. In these instances, we make a reasonable allocation of the cost of the products and services so that only the portion of the cost that is attributable making investment decisions and executing transactions is paid with commission dollars and we bear the cost of the balance. Our interest in making such an allocation differs from clients' interest, in that we have an incentive to designate as much as possible of the cost as research and brokerage in order to minimize the portion that the firm must pay directly. **Mutual Fund Transactions.** Although shares of no-load mutual funds can be purchased and redeemed without payment of transactions fees, we may, consistent with our duty of best execution, determine to cause client accounts to pay transaction fees that may be higher than those obtainable from other broker dealers when purchasing shares of certain no-load mutual funds through TD Ameritrade in order to obtain "research". This research may not be used for the exclusive benefit of the clients who pay transaction fees in purchasing mutual fund shares.

Amount and Manner of Payment. A broker-dealer through which the firm wishes to use soft dollars may establish "credits" arising out of brokerage business done in the past, which may be used to pay, or reimburse the firm for, specified expenses. In other cases, a broker-dealer may provide or pay for the service or product and suggest a level of future business that would fully compensate it. The actual level of transactional business the firm does with a particular broker-dealer during any period may be less than such a

suggested level, but may exceed that level and may generate unused soft dollar "credits." We do not exclude a broker-dealer from receiving business simply because the broker-dealer has not been identified as providing soft dollar research products and services,

although we may not be willing to pay the same commission to such broker-dealer as we would have paid had the broker-dealer provided such products and services.

Directed Brokerage

TIS Group clients may utilize any broker/custodian they choose. TIS Group does not require the use of any broker or custodian. If requested, TIS Group will provide recommendations for brokers/custodians. Certain brokers/custodians require that all trading in client accounts be affected through them. Clients may also direct TIS Group to effect securities transactions through a designated broker. In such instances, TIS Group's ability to negotiate commissions and otherwise obtain best price and execution is eliminated, and those clients may not be included in block trades, which could result in the client receiving less advantageous trade execution.

TIS Group does business with brokers who operate on either a discretionary or non-discretionary basis. Discretionary broker/custodians (those giving us the flexibility to trade away from them) are selected on a best execution and best commission/ best admin. basis. The performance of these brokers is reviewed regularly and re-direction of trades is the result of this evaluation process.

Directed brokerage may not give TIS Group's clients the ability to achieve the most favorable execution of transactions due to the inability of TIS Group to choose between executing brokers. In this event, TIS Group is limited to trading with a client-specific broker who may not have either the technical ability or knowledge to achieve a favorable price as another broker has already attained these traits.

If a client directs TIS Group to execute transactions to a specific broker, favorable execution may not be achieved due to such factors as lack of expertise, limited access to certain markets, lack of proper reporting, settlement problems, among other reasons. Directed brokerage may result in higher costs due to uncompetitive commissions and fees. Transactions are aggregated when possible in order to provide accounts with the same execution price. Transactions executed with different brokers may not be able to be aggregated due to issues such as directed brokerage. Aggregated orders among different investment styles may not be possible.

ITEM 13. REVIEW OF ACCOUNTS

Periodic Reviews—Accounts are reviewed on a periodic basis, as market conditions dictate. Reviewers are Larry Jeddelloh, CIO and Andrew Roalstad, Portfolio Manager.

Review Triggers—Investment matters reviewed include investment return, position sizes, portfolio diversification, economic and industry factors, and company results. Other triggering factors

include large percentage moves in the general market level or an individual security.

Regular Reports—Written statements are issued on a quarterly basis to clients. These statements include listing of issues held, cost, and current market value. Some clients request and are provided monthly performance figures and one or more comparative benchmarks.

ITEM 14. CLIENT REFERRALS AND OTHER COMPENSATION

TIS Group compensates sales representatives of both its investment advisory and periodical subscription services. Sales representatives are generally paid a percentage of the client's fee collected by TIS Group.

From time to time, TIS Group may enter into agreements with certain vendors that provide research and other services to TIS Group to re-distribute such research or services to TIS Group's clients and share a portion of the fee received from those clients with the vendor providing the service. Clients of TIS Group are not charged additional fees as a result of these arrangements.

TD AMERITRADE—As disclosed under Item 12 above, TIS Group participates in TD Ameritrade's institutional customer program and TIS Group may recommend TD Ameritrade to Clients for custody and brokerage services. There is no direct link between TIS Group's participation in the program and the investment advice it gives to its Clients, although TIS Group receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving TIS Group participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client

accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to TIS Group by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by TIS Group's related persons. Some of the products and services made available by TD Ameritrade through the program may benefit TIS Group but may not benefit its Client accounts. These products or services may assist TIS Group in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help TIS Group manage and further develop its business enterprise. The benefits received by TIS Group or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, TIS Group endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by TIS Group or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the TIS Group's choice of TD Ameritrade for custody and brokerage services.

Solicitor's Disclosure Statement



Third party solicitors have been engaged by TIS Group, Inc. ("TIS") to seek and make referrals of prospective clients to TIS. The following disclosure is provided to you, a prospective client ("Client"), pursuant to SEC Rule 206(4)-3(b) under the Investment Advisers Act of 1940:

- Solicitor and TIS are/are not affiliated.

- Solicitor will receive compensation (the "Fee") from Advisor for referral of Client as specified.
- Client will not be charged for, or required to reimburse any portion of the Fee.
- Where clients are received through solicitor arrangements, we disclose the nature of the solicitor relationship to the person.

ITEM 15. CUSTODY

TIS Group does not maintain custody of client securities. Clients are required to engage the services of an unaffiliated qualified custodian prior to or concurrently with the engagement of TIS Group. Custodial statements are sent directly all clients. TIS Group also sends account statements to its clients and urges clients to compare the account statements from TIS Group with the statements they receive from their qualified custodian.

ITEM 16. INVESTMENT DISCRETION

TIS Group accepts discretionary authority on behalf of its clients. Authority is bestowed by the client via signed management contract and/or a Limited Power of Attorney form, often supplied by the client's custodian. This authority allows TIS Group to affect buy and sell orders in client accounts. All client documents are reviewed for completion before trading is authorized to commence.

ITEM 17. VOTING CLIENT SECURITIES

TIS Group accepts the authority to vote proxies on behalf of its clients. Our proxy voting policy is summarized below.

Record Keeping

TIS Group shall maintain for each client:

- a record of receipt of each proxy statement, unless the proxy statement is accessible through EDGAR (the Electronic Data Gathering Analysis, and Retrieval system maintained by the Securities and Exchange Commission);
- a record of each vote cast, unless we have a written agreement with the issuer or its agent to provide such record to us upon request;
- a copy of any document created by us that was material in our decision on how to vote or which memorializes our decision; and
- a copy of any written request by a client for the record of our votes on the client's behalf and our written responses to any client request (written or oral).

Each record shall be maintained in an easily accessible place of storage for at least five (5) years from the end of the fiscal year in which the entry was made. For the first two (2) years of such five (5) year period, the record shall be kept in our principle office.

Voting Procedures

TIS Group shall endeavor:

- to vote all applicable proxies; and
- to mail or otherwise submit all voted proxies within a timely manner after the receipt.

Proxies may be signed and voted by an officer, except that proxies on the "Non-Routine Matters" must be signed and voted by one "proxy officer." "Non-Routine Matters" include all matters presented for vote except:

- election of directors for a company who has not been identified by our chief investment officer as "under-performing" and;
- appointment of officers.

We may engage a third party proxy voting service to vote proxies on our behalf in conformity with our proxy voting policies.

Voting Decisions

- I. We shall vote in a manner which, in our judgment, shall enhance the value of our client's investment. By way of example, and without limitation, we shall consider
 - the independence and expertise of candidates for a corporation's board of directors,
 - the appropriateness of executive compensation,
 - the corporation's strategies for growth (including growth by mergers and acquisitions),
 - the extent of debt financing and capitalization,
 - the nature of long-term business plans, the corporation's investment in training to develop its work force,
 - other workplace practices,
 - financial and non-financial measures of corporate performance,
 - and whether the corporation is publicly traded or not.
2. We will not vote proxies to any social cause distinct from improving financial return to shareholders.
3. If TIS Group receives direction from a client on how to vote any stock in the client's portfolio, we will follow that direction.



-
4. TIS Group may engage third parties to assist in the voting and/or record keeping of proxies.

Conflicts of Interest

TIS Group recognizes that we may have a financial interest in some matters presented for vote and as a result, our interests may conflict with those of our client. For example, we may benefit by voting for, or as recommended by, management of an issuer because members of management are clients to otherwise direct revenue to us. A vote for, or as recommended by, management may be in our interest but may not be in our client's interest. In each case, we shall either:

- disclose the conflict to, and request direction from, the client; or
- vote in accordance with the judgment of an independent third party (such as an institutional proxy advisor) who has rendered advice on the vote most beneficial for investors.

Disclosure

- We shall respond to all client requests for our voting record or for our voting policies and procedures within five (5) business days.
- We shall not disclose its voting record with respect to a client's stock to any person except the client or a regulatory authority with jurisdiction.

ITEM 18. FINANCIAL INFORMATION

TIS Group is not required to submit a balance sheet, pursuant to this item.

FORM ADV PART 2B
BROCHURE SUPPLEMENT

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This brochure supplement provides information about Larry Jeddeloh that supplements the TIS Group, Inc. brochure. You should have received a copy of that brochure. Please contact TIS Group, Inc. if you did not receive TIS Group's brochure or if you have any questions about the contents of this supplement.

Additional information about Larry Jeddeloh is available on the SEC's website at <http://www.adviserinfo.sec.gov>.

Item 2 Educational Background and Business Experience

Larry Jeddelloh—Founder and Chief Investment Officer

DOB: November 15, 1952

Education: University of St. Thomas, B.S., Finance
University of St. Thomas, M.B.A., Finance

Larry is the Editor of The Institutional Strategist; Founder and Chief Investment Officer of TIS Group in Minneapolis, which advises institutions, hedge funds, and family offices in the areas of asset allocation, geonomics, and investment strategy. He is an experienced investment management professional with 38 years in the business.

Most recently, Larry held the position of Chief Investment Officer of Resource Trust, with responsibilities for \$1 billion in assets. Prior to joining Resource, he spent two years in Switzerland with the Union Bank of Switzerland in Zürich, where he was a Vice Director and the Chief Investment Strategist in the Institutional Global Asset Management Group. During the 1980s, he was Director of Equity Research at the Leuthold Group, a well-known institutional research firm in Minneapolis, Minnesota, for seven years. He was also a partner of Leuthold and Anderson Investment Management Counseling and Weeden & Company, an institutional brokerage firm.

Larry earned his Bachelor of Science in Finance and a Masters of Business Administration degree from University of St. Thomas, St. Paul, Minnesota. He has taught courses in investments and corporate finance at the University of Minnesota, Northwestern College, for the Wharton School of Business, and Augsburg College. He has appeared on Bloomberg TV and CNBC. His work has been noted and used in various publications such as The Wall Street Journal, Newsweek, Money Magazine, Your Money, U.S. News & World Report, Barron's, and Global Finance.

Item 3 Disciplinary Information

Larry Jeddelloh has not been involved in or committed a material disciplinary matter.

Item 4 Other Business Activities

Non-Applicable. Larry Jeddelloh does not participate in other business activities.

Item 5 Additional Compensation

Non-Applicable. Larry Jeddelloh receives no additional compensation for his services.

Item 6 Supervision

Chief Compliance Officer, David Jones provides supervisory services to Larry Jeddelloh. Mr. Jeddelloh is monitored via monthly compliance meetings and quarterly compliance reviews.

Item 7 Requirements for State-Registered Advisers

Larry Jeddelloh has never been involved in or committed a material disciplinary matter.

FORM ADV PART 2B
BROCHURE SUPPLEMENT

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This brochure supplement provides information about Andrew Roalstad that supplements the TIS Group, Inc. brochure. You should have received a copy of that brochure. Please contact TIS Group, Inc. if you did not receive TIS Group's brochure or if you have any questions about the contents of this supplement.

Item 2 Educational Background and Business Experience

Andrew Roalstad—Portfolio Manager

DOB: March 12, 1970

Education: St. Olaf College, B.A. Economics
University of St. Thomas, M.B.A. Finance

Business Background:

1995 - July 2009 Head Trader, TIS Group

1995 – Present – Research Analyst, TIS Group

2000 - Present - Portfolio Manager, TIS Group

Mr. Roalstad acts as Portfolio Manager and Analyst at TIS Group. As a Portfolio Manager, Mr. Roalstad manages several strategies, including U.S. Small Cap, U.S. and three ETF-only investment products: Aggressive, Moderate, and Conservative. As an Analyst, monthly, he produces some of TIS Group's "Market Theme" research reports. He then uses this research as the basis of his unique top-down, thematic investment process. Mr. Roalstad has been involved in the investment management industry since 1994, and an employee at TIS Group since 1995. Andrew's work has been noted and used in various publications such as Barron's, Bloomberg News, TheStreet.com, Morning Call on Bloomberg TV, and the German finance magazine, Finanzen €uro. Academia: St. Olaf College, B.A., University of St. Thomas, M.B.A.

Item 3 Disciplinary Information

Andrew Roalstad has never been involved in or committed a material disciplinary matter.

Item 4 Other Business Activities

Andrew Roalstad participates in no other business activities.

Item 5 Additional Compensation

Andrew is compensated with salary and a percentage of management fees on the accounts which he manages. This compensation totals 25% of the management fees generated on accounts under his supervision.

Item 6 Supervision

Andrew Roalstad is supervised by Larry Jeddelloh, President, and CIO of TIS Group. The accounts managed by Mr. Roalstad are monitored on a regular basis. A formal review is done quarterly of client holdings, transactions, positioning, and risk exposure and returns. Mr. Roalstad also writes a market commentary on a regular basis, which Mr. Jeddelloh reviews, revises at times, and approves.

Item 7 Requirements for State-Registered Advisers

Andrew Roalstad has never been involved in or committed a material disciplinary matter.

FORM ADV PART 2B
BROCHURE SUPPLEMENT

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This brochure supplement provides information about Dorothy Fleming that supplements the TIS Group, Inc. brochure. You should have received a copy of that brochure. Please contact TIS Group, Inc. if you did not receive TIS Group's brochure or if you have any questions about the contents of this supplement.

Item 2 Educational Background and Business Experience

Dorothy Fleming, Director of Marketing, TIS Group

Date of Birth: October 6, 1946

Education: Associate of Arts, Metropolitan State Jr. College
Certified Chemical Dependency Specialist

Business Background:

Director of Marketing, TIS Group, January 1999 to present

Item 3 Disciplinary Information

Dorothy Fleming has never been involved in or committed a material disciplinary matter.

Item 4 Other Business Activities

Dorothy Fleming participates in no other business activities.

Item 5 Additional Compensation

Dorothy Fleming is compensated with a salary.

Item 6 Supervision

Larry Jeddelloh, President and Chief Investment Officer, supervises Dorothy Fleming. Marketing materials used by Mrs. Fleming are reviewed and approved by Mr. Jeddelloh. Dorothy's activities are also reviewed and monitored in monthly compliance meetings and quarterly compliance reviews.

Item 7 Requirements for State-Registered Advisers

Dorothy Fleming has never been involved in or committed a material disciplinary matter.

FORM ADV PART 2B
BROCHURE SUPPLEMENT

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UPDATED: MARCH 31, 2016

This brochure supplement provides information about Ross Lambert that supplements the TIS Group, Inc. brochure. You should have received a copy of that brochure. Please contact TIS Group, Inc. if you did not receive TIS Group's brochure or if you have any questions about the contents of this supplement.

Item 2 Educational Background and Business Experience

DOB: January 19, 1962

Education: Princeton University, A.B. Economics (Summa cum Laude)

Professional: NASD Series 7, Series 3, Series 63, 1988.

Canadian Securities Course (Honors), 1985.

Business Background:

Mr. Lambert acts as a Portfolio Advisor/Relationship Manager for TIS Group. He began his career in the investment industry in 1988 as an Institutional Equities Trader with Drexel Burnham Lambert in New York. .

Item 3 Disciplinary Information

Ross Lambert has never been involved in or committed a material disciplinary matter..

Item 4 Other Business Activities

Ross Lambert is a Partner in JWL Management Group, LLC which is involved in developing, advising, and managing the careers of professional athletes.

Item 5 Additional Compensation

Ross does not receive a salary from TIS Group. Mr. Lambert's firms receive a percentage of management fees and performance fees on accounts associated with them..

Item 6 Supervision

Ross Lambert is supervised by Larry Jeddelloh, President and CIO of TIS Group. All actions taken that are connected with TIS Group are monitored on a regular basis.

Item 7 Requirements for State-Registered Advisers

Ross Lambert has never been involved in or committed a material disciplinary matter.