

Item 1 – Cover Page

Money, Inc.

302 Bay Street

12th Floor

Toronto, Ontario, Canada M5X-1A1

www.money.com

March 31, 2013

This Brochure provides information about the qualifications and business practices of Money, Inc. If you have any questions about the contents of this Brochure, please contact us at 312-461-7616 or via email at brian.meikel@bmo.com. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Money, Inc. is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser should provide you with information through which you determine to hire or retain an Adviser.

Additional information about Money also is available on the SEC's website at www.adviserinfo.sec.gov.
#801-62435 / CRD No. 128504

Item 2 – Material Changes

The following is a summary of only material changes made to this Brochure since the last update on August 23, 2012.

As such, this document is materially different from the previously filed brochure. This Item will discuss only specific material changes that are made to the Brochure and provide clients with a summary of such changes.

- Updated current assets under management.
- Updated risk disclosure and allocation procedures related to bank loan securities.
- Updated description of referral arrangements with Monegy affiliates.

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

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

Currently, our Brochure may be requested by contacting Brian Meikel, CCO at 312-461-7616 or brian.meikel@bmo.com. Our Brochure is also available on our web site, www.monegy.com, also free of charge.

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Anti-Money Laundering and Privacy Notice

Item 4 – Advisory Business

Money, Inc. (Money®) is wholly owned subsidiary of BMO Asset Management Corp. and is ultimately owned by Bank of Montreal. Money is a member of BMO Financial Group^{TM1} and has been registered with the SEC since October 2003.

BMO Global Asset Management comprises BMO Asset Management U.S., BMO Asset Management Canada, and BMO's specialized investment boutiques: Money, Inc.®, Pyrford International Ltd, Lloyd George Management (BVI) Ltd, and Taplin, Canida & Habacht, LLC. ,and BMO Asset Management Canada consists of BMO Asset Management Inc.. BMO Global Asset Management is part of the BMO Financial Group, a service mark of Bank of Montreal (BMO).

Money manages accounts on a fully discretionary basis primarily for, or provides investment advice primarily to, institutions including pension funds, mutual funds, banks, and registered investment companies. Money's advisory services may include assistance in establishing investment objectives and guidelines, determining the appropriate industry sectors and risk segments in light of established objectives and guidelines, determining the purchases and sales of securities for client portfolios, monitoring and reviewing holdings and investment performance of portfolios, and providing information on the relative attractiveness of various investments.

Money manages portfolios comprising high yield bonds, bank loans and/or credit derivatives (i.e., credit linked notes, default swaps).

All assets are managed on a fully discretionary basis and, as of December 31, 2012, totaled \$1.6 Billion.

Item 5 – Fees and Compensation

The specific manner in which fees are charged by Money is established in a client's written agreement. The fees for investment supervisory and management services are typically billed quarterly in arrears. Clients may authorize qualified custodians in writing

¹ Trademark of Bank of Montreal and a trade name used by the Bank of Montreal and Harris N.A. in Canada and the U.S.

to pay Monegy's fee directly from an account maintained with such custodian. In those cases, Monegy sends fee invoices to both the client and the client's custodian simultaneously. At least quarterly, and in most cases more frequently, the custodians send detailed statements to the clients. Such statements show the amounts of all fees that have been deducted as of the end of each prior month or quarter. Management fees may be prorated for each capital contribution and withdrawal made during the applicable calendar quarter (with the exception of de minimis contributions and withdrawals). Accounts initiated or terminated during a calendar quarter will be charged a prorated fee. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable. All fees are subject to negotiation.

Monegy receives a fee based on a percentage of the market value of assets in the client's investment account under management. For the Quality High Yield Separate Account Strategy which has an account minimum of \$50 Million; The standard fee schedule is 50 basis points for the first \$50 Million in assets under management, 45 bps for the next \$50 million, and 40 bps thereafter.. In some cases, the fee may deviate for a particular client. Pooled vehicles and Mutual Funds have separate individual fee schedules.

Monegy's fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses that are incurred by the client. Clients may incur certain charges imposed by custodians, brokers, and other third parties, such as custodial fees, wire transfer and electronic fund fees, and other fees on securities transactions. If mutual funds and/or exchange traded funds not advised by Monegy are included in a client's portfolio, those vehicles also charge internal management fees, which are disclosed in each fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to Monegy's fee, and Monegy shall not receive any portion of any such commissions, fees, and costs.

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

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

Where appropriate and not prohibited by law, Monegy will work with a client who wishes to implement a performance-based fee arrangement to develop suitable alternatives to the conventional predetermined percentage of asset-based fee schedules. For instance, a client's fees could be linked to the performance of the assets relative to a mutually agreed

benchmark. If Monegy was to enter into performance fee arrangements with qualified clients: (i) such fees would be subject to individualized negotiation with each such client; and (ii) Monegy would structure any performance or incentive fee arrangement subject to Section 205(a)(1) of the Investment Advisers Act of 1940 (Advisers Act) in accordance with the available exemptions thereunder, including the exemption set forth in Rule 205-3. In measuring clients' assets for the calculation of performance-based fees, Monegy could include realized and unrealized capital gains and losses. Performance-based fee arrangements could create an incentive for Monegy to recommend investments that may be riskier or more speculative than those that would be recommended under a different fee arrangement. Such fee arrangements could also create an incentive to favor higher fee-paying accounts over other accounts in the allocation of investment opportunities. Monegy has procedures designed and implemented to ensure that all clients are treated fairly and equally, and to prevent this conflict from influencing the allocation of investment opportunities among clients (*see Allocation Policy*).

Item 7 – Types of Clients

Monegy provides investment advice to banks, investment companies, pension and profit sharing plans, collective investment trusts, other trusts or pooled vehicles, foreign funds, charitable organizations, corporations, and other business entities.

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

Monegy manages portfolios comprising high yield bonds, bank loans. Monegy's objective is to remain a trusted investment partner, building portfolios that generate positive alpha by maximizing expected return for each client's risk appetite while providing relative downside protection.

Monegy believes that delivering consistently strong performance from credit portfolios requires:

Discipline: a disciplined investment process that balances risk and reward through rigorous asset selection criteria and continuous monitoring of portfolio positions.

Diversification: high levels of diversification to minimize the portfolio impact of principal losses stemming from unexpected default and other event risk.

Objectivity: use of quantitative tools to measure credit risk objectively, and to capture continuous changes in risk and return efficiently, without emotional attachment to individual investments.

Investment Style: Our bottom-up investment style is anchored by our proprietary model and associated management information systems (MIS), creating a highly disciplined and objective process.

Investing in securities involves risk of loss. Investing in high yield bonds may subject the portfolio to greater credit and market risks. As interest rates rise, existing bond prices fall and can cause the value of an investment in the portfolio to decline. Changes in interest rates will affect the value of longer-term fixed income securities more than shorter-term securities. Investing internationally involves additional risks such as currency, political, accounting, economic and market risk.

Subsequently, Monegy employs these additional methods of analysis:

Quantitative Screens/Management Information Systems. We calculate a point estimate of default probability for each issuer, which we update at least weekly. System reports incorporate a number of quantitatively-based triggers, geared to enhance efficiency by focusing analyst attention on changing risks and returns.

Fundamental Overlay. Portfolio managers and analysts overlay sound judgment and fundamental analysis to supplement our default probability model. Our model and MIS reports identify material changes in risks and returns, which then focus the analysts' time and attention where it is most needed.

Defensive, Highly Diversified Portfolios. Linking our decision-making process to our quantitatively-based triggers allows us to maintain high Sharpe Ratio portfolios with objectivity and no emotional attachment to the assets we manage. Shaped by sound risk management principles, we will not take out-sized positions (we rarely hold over 0.9% positions of a given issuer) or barbell our portfolios. We assess the liquidity of the assets we purchase to obtain comfort that we would be able to easily sell positions as required.

Monitoring. An essential element of maintaining high Sharpe Ratios is our embedded monitoring of changing risks and returns on a weekly basis, imposing discipline on analysts and portfolio managers, ultimately maintaining portfolios that optimize return for the client's desired level of risk.

High Yield Fixed Income Securities Risk

Securities rated “BB” or below by S&P or “Ba” or below by Moody’s are known as “high yield” securities. Such securities entail greater price volatility and credit risk than investment grade securities. Analysis of the creditworthiness of high yield-high risk issuers is more complex than for higher-rated securities, making it more difficult for the adviser to accurately predict risk. There is a greater risk with high yield-high risk fixed income securities that an issuer will not be able to make principal and interest payments when due. In addition, lower-rated securities may not trade as often and may be less liquid than higher-rated securities, especially during periods of economic uncertainty or change. As a result of all of these factors, these bonds are generally considered to be speculative.

Bank Loan Securities Risk

Interests in Bank Loans. Bank Loans are subject to liquidity, market value, credit, interest rate, reinvestment and certain other risks. In addition, there can be no assurance that the Money will correctly evaluate the nature and magnitude of the various factors that could affect the value and return of the loan obligations or purchase loan obligations that can generate sufficient returns. It is anticipated that the collateral generally will be subject to greater risks than investment grade corporate obligations. These risks could be exacerbated to the extent that the portfolio may be concentrated in one or more particular types of loan obligations.

Prices of the collateral may be volatile and will generally fluctuate due to a variety of factors that are inherently difficult to predict, including but not limited to changes in interest rates, prevailing credit spreads, general economic conditions, financial market conditions, domestic and international economic or political events, developments or trends in any particular industry, and the financial condition of the obligors of the collateral. In particular, the market for non-investment grade middle market loans has experienced periods of severe price volatility and reduced liquidity. Additionally, loans have significant liquidity and market value risks since they are not generally traded in organized exchange markets but are traded by banks and other institutional investors in privately negotiated transactions. Because loans are privately syndicated and loan agreements are privately negotiated and customized, loans are not purchased or sold as easily as publicly traded securities. In addition, historically the trading volume in the loan market has been small relative to the high-yield debt securities market.

Loan Obligations Illiquidity. Many of the loan obligations purchased will have no, or only a limited, trading market. An investment in illiquid loan obligations may restrict BMO AM’s ability to dispose of investments in a timely fashion and for a fair price, as well as its ability to take advantage of market opportunities. Illiquid loan obligations may trade at a discount from comparable, more liquid investments. The secondary market for middle market loans is smaller and may be less liquid

than the market for broadly-syndicated loans made to larger obligors. The prices realized from the sale of loan obligations could be less than those originally paid or less than what may be considered the fair value of such debt obligations.

Item 9 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Monegy or the integrity of Monegy's management. Monegy has no information applicable to this item.

Item 10 – Other Financial Industry Activities and Affiliations

As part of a large global organization, Monegy has numerous affiliates that are registered brokers dealers, investment company or other pooled investment vehicles, other investment advisers, commodity trading advisors, banks, and sponsor of limited partnerships. A full list of such affiliates is available in Form ADV Part 1 Schedule D. Item 7.A.

Monegy has arrangements with BMO Asset Management Corp.. (it's parent company) (which is 100% owned by BMO Financial Corp.) and with the Bank of Montreal (Monegy's ultimate parent company). These arrangements are articulated in technical service agreements and other inter-company agreements that are reviewed annually.

BMO Asset Management provides compliance, back office, accounting, operations, and marketing services to Monegy. Certain individuals of BMO Asset Management are regular members of Monegy's Investment Policy Committee and Board of Directors. Monegy provides investment advisory and research services to BMO Asset Management. Where such respective services are also available to unrelated parties, Monegy and/or BMO Asset Management (as the case may be) will receive fees at prevailing market rates. Where such services are not generally available to unrelated parties, Monegy and/or BMO Asset Management (as the case may be) will receive fees based on a cost or "cost-plus" method.

Monegy is the sub-adviser to the Virtus High Yield Income Bond Fund (Virtus Fund). BMO Financial Corp., BMO's U.S. subsidiary and sole shareholder of BMO Asset Management, which is the sole shareholder of Monegy, holds shares representing approximately a minority 22% equity position in Virtus Investment Partners, Inc. (Virtus). Virtus is a publicly traded asset management company listed on the NASDAQ stock market (VRTS),

and is the sponsor of the Virtus Fund. In addition, as part of the terms of the minority investment in Virtus an executives of an investment management subsidiary of BMO Financial Group, also is a member of the Virtus Board of Directors.

Money is also a member of BMO Global Asset Management™, which is a trademark of Bank of Montreal and a trade name used in Canada and the U.S. by the Bank of Montreal and BMO Harris Bank N.A. BMO Global Asset Management is the umbrella structure for BMO Financial Group's institutional investment management companies as further detailed in Item #4 above.

When appropriate, employees of BMO Asset Management or Money may also provide information, marketing materials and disclosure documents to clients or potential clients of those institutional investment management companies that are members of BMO Asset Management. These materials are only offered to such investors in those countries and regions in which such offers may legally be made, and in accordance with applicable laws and regulations. Such presentations are generally for informational purposes only and should not be construed as an offer to sell, a solicitation to buy, or a recommendation for any security, or as an offer to provide advisory or other services in any jurisdiction in which such offer, solicitation, purchase, or sale would be unlawful under the securities laws of such jurisdiction.

Item 11 – Code of Ethics

Money, along with other entities within BMO Asset Management, has adopted a code of ethics (Code) as required under the Investment Advisers Act and the Investment Company Act of 1940. The Code sets forth Money's standards of business conduct and puts restrictions and obligations on its employees in order to effect compliance with various federal securities laws. The Code includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. The Code is reviewed and revised as necessary on an annual basis. All supervised persons at Money must acknowledge the terms of the Code annually, or when ever it's amended.

The Code sets forth the expectation that covered personnel will adhere to a certain standard of conduct, give first place to client interests, and not take unfair advantage of

their positions. The Code is also intended to help ensure that the personal securities transactions of covered personnel are conducted in a manner consistent with the federal securities laws by requiring, among other things, that personnel periodically disclose securities holdings. The Code prohibits employees from trading while in possession of material inside information; prohibits employees from serving on the boards of publicly traded companies without the prior authorization; requires pre-clearance of certain personal securities transactions; and subjects covered personnel to penalties for Code violations, including disgorgement of profits.

The Code's gift and entertainment provisions prohibit employees from giving or accepting any cash gifts or excessive entertainment to or from a client, prospective client, or any person or entity that does or seeks to business with or on behalf of Monegy; and giving or accepting any non-cash gifts of more than de minimus value to or from any person or entity that does business with or on behalf of BMO Asset Management. The Code permits the providing or accepting of a business entertainment event, such as dinner or a sporting event, of reasonable value, if the person or entity providing the entertainment is present. The Code requires BMO Asset Management's employees to report to the Chief Compliance Officer gifts and entertainment received in excess of a specified value received or given. Additionally, all gifts or entertainment to or from Taft-Hartley clients must be reported to Monegy's Chief Compliance officer, regardless of amount.

Monegy's clients or prospective clients may request a copy of the firm's Code of Ethics.

Item 12 – Brokerage Practices

Monegy has authority to determine the securities to be bought and sold, and total amounts of securities to be bought and sold, for client accounts. However, certain clients may place certain constraints on investable securities such as limiting the percentage of the total portfolio to be invested in one security or one sector of securities, minimum credit quality, and imposing restrictions on investing in social conscience issuers. All such limitations and restrictions are by agreement between Monegy and the client and are factors considered in determining investment risk and return objectives. Generally, securities will be bought and sold through brokers or dealers selected by Monegy that have been formally approved by its parent organization and affiliates. In some instances, however, the clients may direct Monegy to place trades through or with a designated broker or dealer. In such cases, Monegy cannot ensure that the best price or services will be obtained. Where Monegy is

vested with brokerage discretion, best efforts will be made to obtain the most favorable price and best execution available. In selecting brokers and dealers for its approval list, Money takes into consideration such factors as the financial and operational integrity of the brokers and quality and reliability of execution to be provided. Money's selection of security brokers for each trade is based on a best execution basis that includes the combination of price obtained plus price impact under conditions at the time of the trade, including size of order, difficulty of execution and capital commitments by the broker/dealer.

From time to time, Money may group orders for the same security to be executed at the same time from the Applicant's client accounts. Participating accounts will receive the identical average price of any complete or partial execution of such a single order.

Money may, from time to time and/or at the same or different times, depending upon account guidelines, objectives, cash-flow characteristics, and other criteria, give advice to and effect securities transactions for the accounts of some clients which may be similar to or differ from the advice given or actions taken on behalf of other clients. Money may allocate transactions in securities among clients on such basis as Money determines to be reasonable, including a determination that some clients may not purchase or sell the securities at the same time as others.

Certain affiliated accounts may trade in the same securities with client accounts on an aggregated basis when consistent with Money's obligation of best execution. In such circumstances, the affiliated and client accounts will share commission costs equally and receive securities at a total average price. Money will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. Completed orders will be allocated as specified in the initial trade order. Partially filled orders will be allocated on a pro rata basis. Any exceptions will be explained on the order.

In allocating new issues, securities are allocated, insofar as possible, in a pro rata manner across all accounts that have similar guidelines, objectives, and cash flow characteristics. When the new issue allocation is particularly small or the amount of bonds available in the secondary market is insufficient for a complete pro rata allocation, then the allocation objective will be balanced with adequate liquidity and tradable lot sizes. Care will be taken to ensure that no account is systematically favored or disadvantaged over time in this process.

Similarly in allocating bank loans, securities are allocated when possible in a pro-rata manner across all accounts that have similar guidelines; however when the amount of bank loan securities available may be limited or more likely have limitations as to tradable lot sizes a non-prorata allocation may be required. When it's determined minimum amounts for adequate settlement for certain bank loans will ultimately impact and result in a non-pro-rata allocation such circumstances are documented, and as part of the consideration, no account is favored or disadvantaged. Monegy may cross transactions between client accounts, only if such transactions are fair to both accounts, not prohibited by law or the instruments governing the relationships, there is no benefit to the Monegy, and evidence of an independent valuation source e.g. pricing services or dealer pricing is maintained.

Principal transactions are generally defined as transactions where an adviser, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to any advisory client. A principal transaction may also be deemed to have occurred if a security is crossed between an affiliated fund and another client account. An agency cross transaction is defined as a transaction where a person acts as an investment adviser in relation to a transaction in which the investment adviser, or any person controlled by or under common control with the investment adviser, acts as broker for both the advisory client and for another person on the other side of the transaction. Agency cross transactions may arise where an adviser is dually registered as a broker-dealer or has an affiliated broker-dealer. If it is in the best interest of the client to execute a cross transaction, is within rules and regulations, Monegy will contact the client to disclose the terms of the transactions and obtain consent prior to execution.

Monegy does not participate in any "soft dollar" arrangements.

Item 13 – Review of Accounts

In addition to its normal investment management and advisory portfolio process, Portfolio Managers formally review the performance of client portfolios on a weekly basis, in the Weekly Investment Team Meeting which all investment professionals and the Head of MIS attend. The meeting agenda may include and is not limited to a review of the performance of each account and firm composites, attribution analysis, account tests/guidelines compliance, high risk positions, significant changes in the credit risk of individual issuers, large price/spread movements of individual securities, etc. It is in this forum that portfolio positioning (including plans for investing cash balances), buy/sell ideas and portfolio strategies are discussed in the context of the market environment and economic

developments. In addition, the Money Investment Policy Committee (IPC) meetings occur no less than quarterly. The IPC is Chaired by Sadhana Valia, Managing Director, of Money. Its voting members are senior members of Money's investment team, including all portfolio managers, and also include a representative from BMO Asset Management's Fixed Income Senior Portfolio Management team. The US and Canadian Senior Compliance Officers also sit on the committee as non-voting members. Among other things, the IPC is responsible for reviewing performance, executed trades, trade allocation, portfolio tests/guidelines, the investment process and any client or personal trading violations. A formal account review is performed at least annually to ensure the firm is investing in accordance with client guidelines, investment directives and relevant laws and regulations. With respect to new accounts, the IPC will conduct an initial review of the objectives of the account, ensure that "Know Your Client" criteria are met, and provide its approval for the account. After acceptance of the account, it is included in the process described above, including the cycle of regular portfolio manager reviews, weekly investment team meetings, and the IPC formal portfolio reviews. In general, clients will receive a quarterly report, which summarizes the performance of the account during the immediately preceding quarter. Clients will also meet with portfolio managers on at least an annual basis as agreed by the client. During such meetings, the portfolio managers review with the client relevant objectives, guidelines, securities in the client's account, investment performance, market outlook, and current investment strategy.

Item 14 – Client Referrals and Other Compensation

Money has a relationship with its parent, BMO Asset Management, whereby it acts as a sub-advisor for BMO Asset Management accounts, with respect to high yield advisory services. Money receives fees from its parent for sub-advisory services after BMO Asset Management has paid commissions and client referral fees. Money may also enter into an arrangement where payments are made to the its affiliates, Bank of Montreal, BMO Harris Bank N.A., and other entities in the BMO family of companies for clients referred from certain areas of the Bank. Such payments are made at Money's expense and do not result in any additional fee to advisory clients.

From time to time, Money compensates certain of its employees for client referrals, which may include the introduction of new clients or the retention of existing clients. It also may enter into arrangements whereby payment are made to Bank of Montreal, BMO Harris Bank N.A., or other affiliates of Money in the BMO group of companies (collectively referred to as "Money Affiliates" and/or their respective employees and officers, for

clients referred to Money by Money Affiliates. RIA Affiliates may include other investment advisers registered with the SEC or with securities regulator in foreign countries, U.S. or foreign banks, U.S. or foreign broker-dealers, or other regulated entities. Referral payments are paid by Money and do not result in any additional fee to any Money advisory clients.

Alternatively, officers and employees of Money may introduce new clients or otherwise market products and service of one or more of the Money Affiliates under solicitation agreements with the applicable Money Affiliates, and such persons may receive incentive compensation related to such activities.

Investment products are not FDIC insured, have no bank guarantee and may lose value.

Money may from time to time enter into arrangements with individuals for client solicitation and referral, either directly or indirectly through BMO Asset Management. Such payments are made at Money's expense and do not result in additional fees to advisory clients. Details of the referral agreement are fully disclosed to the client in a "Solicitor Disclosure Statement" provided to the client prior to the execution of the "Investment Advisory Agreement." Such agreements will be in compliance with Rule 206(4)-3 under the Investment Advisers Act of 1940.

Item 15 – Custody

Each client receives at least quarterly statements from the qualified custodian that holds and maintains client's investment assets. Money urges you to carefully review such statements and compare such official custodial records to the account reports that we may provide to you. Our reporting may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities. Money's clients, regardless of their advisory arrangement are under no obligation to use BMO Harris Bank N.A. or any of its affiliates as custodian of their assets.

Item 16 – Investment Discretion

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

Money manages accounts on a fully discretionary basis primarily for, or provides investment advice primarily to, institutions including pension funds, mutual funds, banks, and registered investment companies. Money's advisory services may include assistance in establishing investment objectives and guidelines, determining the appropriate industry sectors and risk segments in light of established objectives and guidelines, selecting security issues, determining the purchases and sales of securities for client portfolios, monitoring and reviewing holdings and investment performance of portfolios, and providing information on the relative attractiveness of various investments and issues.

When selecting securities and determining amounts, Money observes the investment policies, limitations and restrictions of the clients for which it advises. For registered investment companies, Money's authority to trade securities may also be limited by certain federal securities and other laws that require diversification of investments and favor the holding and sales of investments once made.

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

Item 17 – Voting Client Securities

As a manager of fixed income securities, it is unlikely that Money would ever be required to vote proxies. As a matter of firm policy and practice, Money does not have the opportunity and generally has not voted proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios unless specifically directed under the Investment Management Agreement. In the unlikely event that Money needed to vote a proxy, Money would adhere to the Proxy Voting Policy developed with certain of its affiliates, a copy of which is available upon request. As a fiduciary, Money must vote proxies in the sole interest of the beneficiaries, both current and future. The business and/or other interests of the fiduciary must not be allowed to affect the duty of undivided loyalty to the interests of the beneficiaries.

Item 18 – Financial Information

In certain instances registered investment advisers are required in this Item to provide you with certain financial information or disclosures about an adviser's financial condition.

Money has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

Anti- Money Laundering and Privacy Policy

We respect your right to privacy and seek to manage your assets efficiently. To do so, we collect and maintain certain information about you from account applications and other forms, and from transactions you conduct with us, our affiliates, or others. Except for disclosure to our affiliates and service providers and as permitted by law, we do not disclose to anyone any personal information about you or about any of our former customers. We may disclose information about you to companies or individuals that perform administrative or marketing services on our behalf. Those entities may use such information only for the services for which we engaged them and are not permitted to use or share the information for any other purpose. To protect your personal information, we maintain physical, electronic, and procedural safeguards, and we permit access only to those employees who need the information to serve you.

To help the government fight the funding of terrorism and money laundering activities, federal law requires all financial institutions to obtain, verify, and record information that identifies each person who opens an account. What this means for you: When you open an account, we will ask for your name, address, date of birth, and other information that will allow us to identify you. We may also ask to see your driver's license or other identifying documents.

A corporation, partnership, trust or other legal entity may need to provide other information such as its principal place of business, local office, employer identification number, certified articles of incorporation, government-issued business license, a partnership agreement or a trust agreement. We may be required to disclose this information pursuant to applicable laws, rules or regulations, but it will otherwise be retained in confidence according to our privacy policy.