

# **Wealth Management Platform**

## **- Model Portfolios Program -**

### **Part 2A – Appendix 1**

#### **Program Brochure**

**For**

**VISION2020 Wealth Management Corp.**

**10 Exchange Place**

**Suite 1410**

**Jersey City, NJ 07302**

**(800) 821-5100**

**May 23, 2017**

This wrap fee program brochure provides information about the qualifications and business practices of VISION2020 Wealth Management Corporation. If you have any questions about the content of this brochure, please contact us at 800-821-5100. 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 VISION2020 Wealth Management Corporation also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

## **Item 2 - Material Changes**

This Item discusses only specific material changes that are made to this Brochure and provides clients with a summary of such changes. The last amendment of the Model Portfolios Program Form ADV, Part 2A (Appendix-1), was March 2017. There have been no additions or updates of material information since the last update of this Brochure. Since the last update to this Appendix-1, the following changes have been made:

- Cover Page – Updated Firm business address.
- Item 7 - Client Information Provided to Portfolio Managers – Updated privacy policy contact information.

## Item 3 – Table of Contents

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## Item 4 - Services, Fees and Compensation

The Wealth Management Platform – Model Portfolios Program (“Program”) is sponsored by VISION2020 Wealth Management Corp., (“VISION2020”, the “Firm,” “us”, “we” or “our”), an SEC-Registered Investment Adviser. VISION2020 is a subsidiary of Advisor Group, Inc., a wholly-owned subsidiary of Advisor Group Holdings, Inc., which is owned by a consortium of investors that includes Lightyear Fund III, L.P. (an investment fund affiliated with Lightyear Capital LLC) and PSPIB Lunar Investments Inc. (a wholly-owned vehicle of the Public Sector Pension Investment Board).

The Program is presented to the client (“you” or “your”) by Investment Adviser Representatives (“Advisory Representatives”) of a registered investment adviser (“Advisor”) that may be a “Related Person” (as defined in Form ADV) to us. Please refer to the Advisor’s Form ADV, Part I to determine if your Advisor is a Related Person to us.

To join the Program, you will enter into an investment advisory client agreement (“Client Agreement”) with us and your Advisor and establish a brokerage account (“Program Account”) on a fully disclosed basis with the Advisor’s associated broker-dealer.

### Advisory Services

The Program offers you managed asset allocation models (“Asset Allocation Models”) of mutual funds and exchange traded funds (“ETFs”) diversified across various investment styles and strategies. The Asset Allocation Models are constructed by the following managers (“Program Managers”) as provided below. .

*BlackRock Investment Management, LLC*

*Caprin Asset Management, LLC*

*Clark Capital Management Group, Inc.*

*Envestnet Asset Management, Inc.*

*LWI Financial Inc.*

*New Frontier Advisors, LLC*

*Russell Investment Management Company, LLC*

*Vanguard Advisers, Inc.*

In addition, certain clients maintain investments in asset allocation models that are no longer offered as part of the Program.

Program Managers that construct mutual fund Asset Allocation Models use load waived or no-load mutual funds. The cost of purchasing and holding mutual fund shares through the Program may be more or less than investing in mutual fund shares in a brokerage account, depending upon the amount of the advisory fees and the specific mutual funds selected for investment within the Program.

Based upon your risk tolerance and financial objectives, the Program utilizes a system that recommends a specific Asset Allocation Model which contains: 1) a combination of mutual funds, 2) a combination of exchange traded funds ETFs, or 3) a combination of mutual funds and ETFs, depending on which Program Manager is employed. After the recommendation is made, you and your Advisor will select an Asset Allocation

Model. The Advisor, with our assistance, will open a Program Account and your assets will be invested in the specific investments contained within the selected Asset Allocation Model.

You have the opportunity to place reasonable restrictions on the investments held within your Program Account. Such restrictions can cause; (i) a divergence in account performance from the Asset Allocation Model originally presented to you; (ii) a delay in the reporting of account performance; and (iii) a delay in the rebalancing of the portfolio funds within your account.

We make no representations regarding the future performance of any Asset Allocation Model. As always, past performance is not a guarantee of future results.

To participate in the Program, you agree to establish a brokerage account on a fully disclosed basis at your Advisor's associated broker-dealer in order to effect mutual fund transactions and exchange traded fund transactions and to hold these positions in connection with the Program.

We will provide monitoring and review of Asset Allocation Models. We have the discretion to modify and/or rebalance a Program Manager's Asset Allocation Model and its associated Program Accounts without your consent consistent with your agreed upon investment objectives and risk tolerance.

#### *BlackRock Investment Management, LLC*

Program Manager, BlackRock Investment Management, LLC ("BlackRock") will provide ETF Asset Allocation Models composed of a series of ETFs offered within 14 different portfolios with each portfolio generally consisting of 7-16 ETFs. With our assistance, your Advisor will invest your Program Account in a recommended BlackRock Allocation Model of ETFs suitable to your risk tolerance and investment objectives. We will be responsible for rebalancing the portfolio of ETFs within your account generally in accordance with the instructions provided by Black Rock. There can be no assurance that any of your investment goals will be met or that the net return on an investment in a portfolio of ETFs will exceed what could have been obtained through other investment or savings strategies.

#### *Caprin Asset Management, LLC*

Program Manager, Caprin Asset Management, LLC ("Caprin") will provide ETF Asset Allocation Models composed of a series of ETFs offered within three different portfolios with each portfolio generally consisting of 5 to 10 ETFs. With our assistance, your Advisor will invest your Program Account in a recommended Caprin Asset Allocation Model of ETFs suitable to your risk tolerance and investment objectives. We will be responsible for rebalancing the portfolio of ETFs within your account generally in accordance with the instructions provided by Caprin. There can be no assurance that any of your investment goals will be met or that the net return on an investment in a portfolio of ETFs will exceed what could have been obtained through other investment or savings strategies.

#### *Clark Capital Management Group, Inc.*

Program Manager, Clark Capital Management Group, Inc. ("Clark Capital") will provide Asset Allocation Models composed of a combination of mutual funds and ETFs offered within 12 different portfolios ("Global Navigator and MultiStrategy") with each portfolio generally consisting of 2 to 5 holdings. Portfolios will provide exposure to a blend of fixed income and global equity asset classes. In addition, Clark Capital will provide a fixed income focused portfolio generally consisting of 2 to 4 ETF holdings ("Clark Capital Fixed Income"). With our assistance, your Advisor will invest your Program Account in a recommended Clark Capital Asset Allocation Model suitable to your risk tolerance and investment objectives. We will be responsible for rebalancing the portfolio within your account generally in accordance with the instructions provided by Clark Capital. There can be no assurance that any of your investment goals will be met or that the net return on an investment in a portfolio of mutual funds and ETFs will exceed what could have been obtained through other investment or savings strategies.

The Program offers Asset Allocation Models constructed by Envestnet Asset Management, (the “PMC Asset Allocation Models”) and Russell Investment Management (the “Russell Hybrid Model Portfolios”) , which are collectively marketed under the name of “Advisor Group Genesis Series”. The Advisor Group Genesis Series is offered to accounts with initial balances of less than \$25,000. The Advisor Group Genesis Series

*1. Envestnet Asset Management – PMC Asset Allocation Models*

**(a) Genesis Series: PMC Passive Foundation Portfolios**

Program Manager, Envestnet Asset Management (“EAM”), will provide asset allocation models constructed exclusively with low-cost passively managed index mutual funds to offer broad-market exposure, lower return variability, and low turnover (the “PMC Passive Foundation Portfolios”). Each portfolio will consist of approximately 3 – 5 holdings. With our assistance, your Advisor will invest your Program Account in a recommended Passive Foundation Portfolio of mutual funds suitable to your risk tolerance and investment objectives. We will be responsible for rebalancing the portfolio of mutual funds within your account generally in accordance with the instructions provided by PMC. There can be no assurance that any of your investment goals will be met or that the net return on an investment in a portfolio of mutual funds will exceed what could have been obtained through other investment or savings strategies.

**(b) Genesis Series: PMC American Funds® Active Core Portfolios**

Program Manager, Envestnet Asset Management (“EAM”), has partnered with Capital Group’s American Funds to provide a series of mutual fund based asset allocation portfolios, constructed by selecting active managers whose funds have both high manager ownership and low expense ratios (the “PMC American Funds® Active Core Portfolios”). Each portfolio will consist of approximately 12 - 16 holdings. The allocation to Capital Group’s – American Funds used in model portfolios will vary based on the quantitative and qualitative assessments resulting from EAM’s due diligence process. With our assistance, your Advisor will invest your Program Account in a recommended PMC American Funds® Active Core Portfolio suitable to your risk tolerance and investment objectives. We will be responsible for rebalancing the portfolio of mutual funds within your account generally in accordance with the instructions provided by EAM. There can be no assurance that any of your investment goals will be met or that the net return on an investment in a portfolio of mutual funds will exceed what could have been obtained through other investment or savings strategies.

**(c) Genesis Series: PMC Strategic ETF Solution Portfolios**

Program Manager, Envestnet Asset Management (“EAM”), will provide Asset Allocation Models constructed using ETFs across 7 model portfolio options, with each portfolio consisting of 5 -8 holdings (the “PMC Strategic ETF Solution Portfolios”). With our assistance, your Advisor will invest your Program Account in a recommended PMC Strategic ETF Solution Portfolios suitable to your risk tolerance and investment objectives. We will be responsible for rebalancing the portfolio of ETFs within your account generally in accordance with the instructions provided by EAM. There can be no assurance that any of your investment goals will be met or that the net return on an investment in a portfolio of ETFs will exceed what could have been obtained through other investment or savings strategies.

*2. Russell Investment Management Company- Hybrid Model Portfolios*

**(a) Genesis Series: Russell Hybrid Model Portfolios**

The Russell Investment Company will provide Asset Allocation Models, known as the Russell Funds Hybrid Model Portfolios (“Russell Hybrid Model Portfolios”), constructed using a mix of 8-10 exchange traded funds (ETFs) and Russell Investment Company mutual funds. The Russell Hybrid Model Portfolios consist of 5 risk-based model portfolio options each with a unique allocation of four asset classes (U.S. Equity, International Equity, Fixed Income and Real Assets). With our assistance, your Advisor will invest your Program Account in a

recommended Asset Allocation Model of Russell Hybrid Model Portfolios suitable to your risk tolerance and investment objectives. We will be responsible for rebalancing the portfolio of Russell Hybrid Model Portfolios within your account, generally in accordance with the instructions provided by Russell Investment Management Company. There can be no assurance that any of the investment goals for your account will be met or that the net return on an investment in a portfolio of the funds will exceed what could have been obtained through other investment or savings strategies.

*LWI Financial, Inc.*

Program Manager, LWI Financial Inc. (“Loring Ward” or “LWI”) will provide Asset Allocation Models composed of a group of mutual funds advised by Dimensional Fund Advisors, Inc. (“DFA Funds”). With our assistance, your Advisor will invest your Program Account in a recommended Asset Allocation Model of DFA Funds suitable to your risk tolerance and investment objectives. We will be responsible for rebalancing the portfolio of DFA Funds within your account generally in accordance with the instructions provided by Loring Ward. There can be no assurance that any of the investment goals for your account will be met or that the net return on an investment in a portfolio of the funds will exceed what could have been obtained through other investment or savings strategies.

*New Frontier Advisors, LLC*

Program Manager, New Frontier Advisors, LLC (“New Frontier”) will provide ETF Asset Allocation Models composed of a series of ETFs offered within 12 different portfolios with each portfolio generally consisting of 15 to 30 ETFs. With our assistance, your Advisor will invest your Program Account in a recommended New Frontier Asset Allocation Model of ETFs suitable to your risk tolerance and investment objectives. We will be responsible for rebalancing the portfolio of ETFs within your account generally in accordance with the instructions provided by New Frontier. There can be no assurance that any of your investment goals will be met or that the net return on an investment in a portfolio of ETFs will exceed what could have been obtained through other investment or savings strategies.

*Russell Investment Management Company*

The Russell Investment Company Funds (“Russell Funds”) are managed by Russell Investment Management Company and other managers as disclosed by the respective prospectus for each of the Russell Funds. With our assistance, your Advisor will invest your Program Account in a recommended Asset Allocation Model of Russell Funds suitable to your risk tolerance and investment objectives. If suitable, assets will be invested in an Asset Allocation Model of Russell Funds designed to help minimize taxable events (“Russell – Tax Managed Model”). We will be responsible for rebalancing the portfolio of Russell Funds within your account, generally in accordance with the instructions provided by Russell Investment Management Company. There can be no assurance that any of the investment goals for your account will be met or that the net return on an investment in a portfolio of the funds will exceed what could have been obtained through other investment or savings strategies.

The distinguishing feature of the Russell Hybrid Model Portfolios as compared with the aforementioned Russell Funds and Tax Managed Model is the addition of passive and factor-based investment strategies in the Russell Hybrid Model Portfolios. In addition, the Russell Funds and Tax Managed Model use of active managers exclusively.

*Vanguard Advisers, Inc.*

Program Manager, Vanguard Advisers, Inc. (“Vanguard”) will provide ETF Asset Allocation Models composed of a series of ETFs offered within 12 different portfolios with each portfolio generally consisting of 4-10 ETFs. With our assistance, your Advisor will invest your Program Account in a recommended Vanguard Asset Allocation Model of ETFs suitable to your risk tolerance and investment objectives. We will be responsible for rebalancing the portfolio of ETFs within your account generally in accordance with the instructions provided by Vanguard. There can be no assurance that any of your investment goals will be met or that the net return on an investment in a portfolio of ETFs will exceed what could have been obtained through other investment or savings strategies.



## Program Costs

You will be charged an annual fee based upon the value of the Program assets you have under management which covers management, administrative and transaction costs ("Account Fee" or "Wrap Fee"). Fees are negotiable and range up to 2.62% of the assets under management that are collected by your Advisor, the Advisor Representative's associated broker-dealer and Related Persons.

Your Account Fee will bill quarterly, in advance, based upon the market value of the Program assets as of the last business day of the preceding calendar quarter. Quarterly Account Fees are determined by prorating the applicable rate in the annual account fee schedule for the number of calendar days for each quarter. The account fee schedule is illustrated in the Statement of Investment Selection ("SIS"). In the event that additions to, or withdrawals from, the account are made in excess of \$10,000 during any given quarter, the Account Fee will be adjusted on a pro-rata basis to the account from which the charge was debited. Adjustments are calculated as follows:

- a. Prior fees paid in advance for the remaining calendar days in the quarter, as of the date of the addition or withdrawal, will be refunded ("Prior Fees Paid").
- b. Fees will be recalculated for the remaining number of calendar days as of the date of the addition or withdrawal ("Recalculated Fees"). Recalculated Fees are determined by pro-rating the applicable rate in the annual account fee schedule for the number of calendar days remaining in the quarter.
- c. The applicable rate for the Recalculated Fees will be determined based on the market value of the assets as of the date of the addition or withdrawal. This may result in a different rate for Recalculated Fees versus Prior Fees Paid for the same period.
- d. The net difference of the Recalculated Fees and the Prior Fees Paid may result in a credit or debit to the account.

Please find on the following page, the annualized, maximum Account Fee guidelines for the above referenced Asset Allocation Models. Your actual Account Fee schedule is included in the SIS which will be provided to you.

## Schedule of Account Fees

The Account Fee is composed of two components, a "Program Fee" and an "Advisory Fee."

The Advisory Fee is primarily paid to your Advisory Representative for services provided on behalf of the Advisor as outlined above. Your Advisory Representative's supervisor and associated Broker-Dealer typically also receive a small portion of the Advisory Fee for supervisory and administrative services. The maximum Advisory Fee is 1.75% of the assets under management.

Portions of the Program Fee are remitted to: 1) us and our Related Persons as sponsor of the Program; 2) Program Managers for investment management services; 3) third party administrators and platform software providers; and 4) the custodian, for execution of transactions with respect to assets and custodial services. Depending on the aggregated total Account Fee billings of all clients maintained by an Advisory Representative in the Program, we or our Related Persons provide the Advisory Representative Program discounts (ranging from a 10% to 80% of the fees retained by us and our Related Persons). An Advisory Representative's compensation will increase by the amount of the discount received, but your Account Fee and cost will remain unchanged.

As reflected in the fee schedules below, different Minimum Account Fees apply depending on the Program Manager and/or the Asset Allocation Model selected. Since the Advisory Fee remains constant, to the extent that a Program Manager and/or Asset Allocation Model represents more or less of the assets in the client account, the Account Fee rate can increase or decrease each quarter depending on total account value and which Program Manager and/or Asset Allocation Model has been selected in the account.

The Account Fee charged in any given quarter will be reflected in the account statements sent to client. In addition clients can request a fee statement from the Advisor at any time which will reflect the amount of the quarterly Account Fee and the asset-based fee rate applied.

Program Accounts under \$40,000 will be assessed an annual small account fee of \$35 (the "Small Account Fee"). The Small Account Fee will be billed quarterly, in advance, based on the number of days in the quarter. When applied, the Small Account Fee may cause the Maximum Account Fee applied to exceed the amount specified in the schedules below. The Small Account Fee is being waived on all accounts under \$40,000 until further notice.

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### BlackRock Investment Management

| Total Account Value          | Minimum Account Fee | Maximum Account Fee |
|------------------------------|---------------------|---------------------|
| \$25,000 to \$99,999         | 0.340%              | 2.090%              |
| \$100,000 to \$249,999       | 0.340%              | 2.090%              |
| \$250,000 to \$499,999       | 0.305%              | 2.055%              |
| \$500,000 to \$749,999       | 0.295%              | 2.045%              |
| \$750,000 to \$999,999       | 0.260%              | 2.010%              |
| \$1,000,000 to \$1,999,999   | 0.235%              | 1.985%              |
| \$2,000,000 to \$4,999,999   | 0.200%              | 1.950%              |
| \$5,000,000 to \$9,999,999   | 0.165%              | 1.915%              |
| \$10,000,000 to \$24,999,999 | 0.165%              | 1.915%              |
| 25,000,000 and Over          | 0.155%              | 1.905%              |

Minimum Account Size = \$25,000

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### Caprin Asset Management

| Total Account Value          | Minimum Account Fee | Maximum Account Fee |
|------------------------------|---------------------|---------------------|
| \$25,000 to \$99,999         | 0.540%              | 2.290%              |
| \$100,000 to \$249,999       | 0.540%              | 2.290%              |
| \$250,000 to \$499,999       | 0.505%              | 2.255%              |
| \$500,000 to \$749,999       | 0.495%              | 2.245%              |
| \$750,000 to \$999,999       | 0.460%              | 2.210%              |
| \$1,000,000 to \$1,999,999   | 0.435%              | 2.185%              |
| \$2,000,000 to \$4,999,999   | 0.400%              | 2.150%              |
| \$5,000,000 to \$9,999,999   | 0.365%              | 2.115%              |
| \$10,000,000 to \$24,999,999 | 0.365%              | 2.115%              |
| 25,000,000 and Over          | 0.355%              | 2.105%              |

Minimum Account Size = \$25,000

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### Clark Fixed Income

| Total Account Value          | Minimum Account Fee | Maximum Account Fee |
|------------------------------|---------------------|---------------------|
| \$25,000 to \$99,999         | 0.690%              | 2.440%              |
| \$100,000 to \$249,999       | 0.690%              | 2.440%              |
| \$250,000 to \$499,999       | 0.655%              | 2.405%              |
| \$500,000 to \$749,999       | 0.645%              | 2.395%              |
| \$750,000 to \$999,999       | 0.610%              | 2.360%              |
| \$1,000,000 to \$1,999,999   | 0.585%              | 2.335%              |
| \$2,000,000 to \$4,999,999   | 0.550%              | 2.300%              |
| \$5,000,000 to \$9,999,999   | 0.515%              | 2.265%              |
| \$10,000,000 to \$24,999,999 | 0.515%              | 2.265%              |
| 25,000,000 and Over          | 0.505%              | 2.255%              |

Minimum Account Size = \$25,000

### Clark Global Navigator/MultiStrategy

| Total Account Value          | Minimum Account Fee | Maximum Account Fee <sup>1</sup> |
|------------------------------|---------------------|----------------------------------|
| \$25,000 to \$99,999         | 0.390%              | 2.140%                           |
| \$100,000 to \$249,999       | 0.390%              | 2.140%                           |
| \$250,000 to \$499,999       | 0.355%              | 2.105%                           |
| \$500,000 to \$749,999       | 0.345%              | 2.095%                           |
| \$750,000 to \$999,999       | 0.310%              | 2.060%                           |
| \$1,000,000 to \$1,999,999   | 0.285%              | 2.035%                           |
| \$2,000,000 to \$4,999,999   | 0.250%              | 2.000%                           |
| \$5,000,000 to \$9,999,999   | 0.215%              | 1.965%                           |
| \$10,000,000 to \$24,999,999 | 0.215%              | 1.965%                           |
| 25,000,000 and Over          | 0.205%              | 1.955%                           |

Minimum Account Size = \$25,000

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<sup>1</sup> The Maximum Account Fee includes revenue sharing payments made by Clark Global Navigator/MultiStrategy to the Advisor's associated broker-dealer.

### Advisor Group Genesis Series

#### 1. *Envestnet Asset Management* (PMC Asset Allocation Models)

##### (a) Genesis Series: PMC Passive Foundation Portfolios

| Total Account Value          | Minimum Account Fee | Maximum Account Fee |
|------------------------------|---------------------|---------------------|
| \$5,500 to \$99,999          | 0.440%              | 2.190%              |
| \$100,000 to \$249,999       | 0.440%              | 2.190%              |
| \$250,000 to \$499,999       | 0.405%              | 2.155%              |
| \$500,000 to \$749,999       | 0.395%              | 2.145%              |
| \$750,000 to \$999,999       | 0.360%              | 2.110%              |
| \$1,000,000 to \$1,999,999   | 0.335%              | 2.085%              |
| \$2,000,000 to \$4,999,999   | 0.300%              | 2.050%              |
| \$5,000,000 to \$9,999,999   | 0.265%              | 2.015%              |
| \$10,000,000 to \$24,999,999 | 0.265%              | 2.015%              |
| \$25,000,000 and Over        | 0.255%              | 2.005%              |

Minimum Account Size = \$5,500

##### (b) Genesis Series: PMC American Funds® Active Core Portfolios

| Total Account Value          | Minimum Account Fee | Maximum Account Fee |
|------------------------------|---------------------|---------------------|
| \$10,000 to \$99,999         | 0.440%              | 2.190%              |
| \$100,000 to \$249,999       | 0.440%              | 2.190%              |
| \$250,000 to \$499,999       | 0.405%              | 2.155%              |
| \$500,000 to \$749,999       | 0.395%              | 2.145%              |
| \$750,000 to \$999,999       | 0.360%              | 2.110%              |
| \$1,000,000 to \$1,999,999   | 0.335%              | 2.085%              |
| \$2,000,000 to \$4,999,999   | 0.300%              | 2.050%              |
| \$5,000,000 to \$9,999,999   | 0.265%              | 2.015%              |
| \$10,000,000 to \$24,999,999 | 0.265%              | 2.015%              |
| \$25,000,000 and Over        | 0.255%              | 2.005%              |

Minimum Account Size = \$10,000

(c) Genesis Series: PMC Strategic ETF Solution Portfolios

| Total Account Value          | Minimum Account Fee | Maximum Account Fee |
|------------------------------|---------------------|---------------------|
| \$15,000 to \$99,999         | 0.440%              | 2.190%              |
| \$100,000 to \$249,999       | 0.440%              | 2.190%              |
| \$250,000 to \$499,999       | 0.405%              | 2.155%              |
| \$500,000 to \$749,999       | 0.395%              | 2.145%              |
| \$750,000 to \$999,999       | 0.360%              | 2.110%              |
| \$1,000,000 to \$1,999,999   | 0.335%              | 2.085%              |
| \$2,000,000 to \$4,999,999   | 0.300%              | 2.050%              |
| \$5,000,000 to \$9,999,999   | 0.265%              | 2.015%              |
| \$10,000,000 to \$24,999,999 | 0.265%              | 2.015%              |
| \$25,000,000 and Over        | 0.255%              | 2.005%              |

Minimum Account Size = \$15,000

2. Russell Investment Management - Hybrid Model Portfolios

Genesis Series: Russell Hybrid Model Portfolios

| Total Account Value          | Minimum Account Fee | Maximum Account Fee |
|------------------------------|---------------------|---------------------|
| \$25,000 to \$99,999         | 0.340%              | 2.090%              |
| \$100,000 to \$249,999       | 0.340%              | 2.090%              |
| \$250,000 to \$499,999       | 0.305%              | 2.055%              |
| \$500,000 to \$749,999       | 0.295%              | 2.045%              |
| \$750,000 to \$999,999       | 0.260%              | 2.010%              |
| \$1,000,000 to \$1,999,999   | 0.235%              | 1.985%              |
| \$2,000,000 to \$4,999,999   | 0.200%              | 1.950%              |
| \$5,000,000 to \$9,999,999   | 0.165%              | 1.915%              |
| \$10,000,000 to \$24,999,999 | 0.165%              | 1.915%              |
| 25,000,000 and Over          | 0.155%              | 1.905%              |

Minimum Account Size = \$10,000

### Loring Ward DFA Funds

| Total Account Value          | Minimum Account Fee | Maximum Account Fee |
|------------------------------|---------------------|---------------------|
| \$25,000 to \$99,999         | 0.490%              | 2.240%              |
| \$100,000 to \$249,999       | 0.490%              | 2.240%              |
| \$250,000 to \$499,999       | 0.455%              | 2.205%              |
| \$500,000 to \$749,999       | 0.445%              | 2.195%              |
| \$750,000 to \$999,999       | 0.410%              | 2.160%              |
| \$1,000,000 to \$1,999,999   | 0.385%              | 2.135%              |
| \$2,000,000 to \$4,999,999   | 0.350%              | 2.100%              |
| \$5,000,000 to \$9,999,999   | 0.315%              | 2.065%              |
| \$10,000,000 to \$24,999,999 | 0.315%              | 2.065%              |
| 25,000,000 and Over          | 0.305%              | 2.055%              |

Minimum Account Size = \$50,000

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**New Frontier Advisors, LLC**

| <b>Total Account Value</b>          | <b>Minimum Account Fee</b> | <b>Maximum Account Fee</b> |
|-------------------------------------|----------------------------|----------------------------|
| <b>\$25,000 to \$99,999</b>         | 0.590%                     | 2.340%                     |
| <b>\$100,000 to \$249,999</b>       | 0.590%                     | 2.340%                     |
| <b>\$250,000 to \$499,999</b>       | 0.555%                     | 2.305%                     |
| <b>\$500,000 to \$749,999</b>       | 0.545%                     | 2.295%                     |
| <b>\$750,000 to \$999,999</b>       | 0.510%                     | 2.260%                     |
| <b>\$1,000,000 to \$1,999,999</b>   | 0.485%                     | 2.235%                     |
| <b>\$2,000,000 to \$4,999,999</b>   | 0.450%                     | 2.200%                     |
| <b>\$5,000,000 to \$9,999,999</b>   | 0.415%                     | 2.165%                     |
| <b>\$10,000,000 to \$24,999,999</b> | 0.415%                     | 2.165%                     |
| <b>25,000,000 and Over</b>          | 0.405%                     | 2.155%                     |

**Minimum Account Size = \$25,000**

**[This section intentionally left blank.]**

**Russell Investment Management, LLC**

| <b>Total Account Value</b>          | <b>Minimum Account Fee</b> | <b>Maximum Account Fee</b> |
|-------------------------------------|----------------------------|----------------------------|
| <b>\$25,000 to \$99,999</b>         | 0.340%                     | 2.090%                     |
| <b>\$100,000 to \$249,999</b>       | 0.340%                     | 2.090%                     |
| <b>\$250,000 to \$499,999</b>       | 0.305%                     | 2.055%                     |
| <b>\$500,000 to \$749,999</b>       | 0.295%                     | 2.045%                     |
| <b>\$750,000 to \$999,999</b>       | 0.260%                     | 2.010%                     |
| <b>\$1,000,000 to \$1,999,999</b>   | 0.235%                     | 1.985%                     |
| <b>\$2,000,000 to \$4,999,999</b>   | 0.200%                     | 1.950%                     |
| <b>\$5,000,000 to \$9,999,999</b>   | 0.165%                     | 1.915%                     |
| <b>\$10,000,000 to \$24,999,999</b> | 0.165%                     | 1.915%                     |
| <b>25,000,000 and Over</b>          | 0.155%                     | 1.905%                     |

**Minimum Account Size = \$25,000**

**[This section intentionally left blank.]**

**Vanguard Advisers, Inc.**

| <b>Total Account Value</b>          | <b>Minimum Account Fee</b> | <b>Maximum Account Fee</b> |
|-------------------------------------|----------------------------|----------------------------|
| <b>\$25,000 to \$99,999</b>         | 0.340%                     | 2.090%                     |
| <b>\$100,000 to \$249,999</b>       | 0.340%                     | 2.090%                     |
| <b>\$250,000 to \$499,999</b>       | 0.305%                     | 2.055%                     |
| <b>\$500,000 to \$749,999</b>       | 0.295%                     | 2.045%                     |
| <b>\$750,000 to \$999,999</b>       | 0.260%                     | 2.010%                     |
| <b>\$1,000,000 to \$1,999,999</b>   | 0.235%                     | 1.985%                     |
| <b>\$2,000,000 to \$4,999,999</b>   | 0.200%                     | 1.950%                     |
| <b>\$5,000,000 to \$9,999,999</b>   | 0.165%                     | 1.915%                     |
| <b>\$10,000,000 to \$24,999,999</b> | 0.165%                     | 1.915%                     |
| <b>25,000,000 and Over</b>          | 0.155%                     | 1.905%                     |

**Minimum Account Size = \$25,000**

**[This section intentionally left blank.]**

## Methods of Calculating Account Fees

Your Account Fee is billed using either the “Tiered” or “Linear” method. To illustrate, please refer to the sample billing schedule below:

| Total Account Value:  | Account Fee: |
|-----------------------|--------------|
| \$0 - \$249,999       | X%           |
| \$250,000 - \$499,999 | Y%           |

- Under the Tiered billing method, a Total Account Value of \$400,000 would be billed as follows: the first \$249,999 would be billed at X% with the remaining \$150,001 to be billed at Y%.
- Under the Linear billing method, a Total Account Value of \$400,000 would be billed at Y%.

The SIS which will be provided to you will disclose if your Account Fee is calculated using Tiered or Linear billing.

## Negotiation of Account Fees

Subject to the maximum Account Fee limitations imposed by the preceding fee schedules, each Advisory Representative: (i) negotiates with clients their own Account Fee schedule, and (ii) determines on a client by client basis the Accounts that will be included in the same “household” for purposes of calculating the Account Fee. The actual Account Fee schedule will be shown in the SIS.

Account Fees and terms are negotiated on a case-by-case basis, depending on a variety of factors, including the nature and complexity of the particular service, the requirements of your particular Advisory Representative, your relationship with your Advisory Representative, the size of the Account, the potential for other business or clients, the amount of work anticipated and the attention needed to manage the Account, among other factors.

## General Information Concerning Fees and Other Client Charges

Account Fees charged to you are shared among your Advisor, your Advisory Representative, its associated broker-dealer and us. Part of the fee is remitted to the custodian who serves as the associated broker-dealer’s clearing firm.

All mutual funds comprising the portfolio of funds will be purchased at Net Asset Value without the imposition of any sales charges. Certain Program Managers use mutual funds that assess 12b-1 distribution fees as described in each mutual fund’s prospectus. The 12b-1 fees received by us or our broker-dealer affiliates will be rebated to the client.

You will bear a proportionate share of the fees and expenses of any mutual funds selected and for money market funds used as “sweep vehicles” for uninvested cash balances. These fees and expenses typically include investment advisory, administrative, distribution, transfer agent, custodial, legal, audit and other customary fees and expenses related to investment in mutual funds and are in addition to the Account Fee. Please read the prospectuses of the mutual funds selected for a more complete explanation of these fees and expenses.

You have the option to purchase shares of mutual funds outside of the Program directly from the mutual fund issuer, its principal underwriter or a distributor without purchasing the services of the Program or paying the Account Fee on such shares (but subject to any applicable sales charges). Certain mutual funds are offered to the public without a sales charge. In the case of mutual funds offered with a sales charge, the prevailing sales charge is determined by the mutual fund (as described in the mutual fund prospectus) and may be more or less than the applicable account fee.

There are additional fees relating to IRA and Qualified Retirement Plan accounts that you normally incur such as maintenance and termination fees. You will find these fees disclosed in the account application paperwork provided to you associated with these accounts.

Accordingly, you should review the Account Fee and the other fees outlined above to fully understand the total amount of fees you pay.

Please consider that depending upon the level of the Account Fee charged, the amount of portfolio activity in your account, the value of services that are provided under the Program, and other factors, the Account Fee may or may not exceed the aggregate cost of such services if they were to be provided separately.

Depending upon the level of the Account Fee, your Advisor may receive more compensation:

- 1) as a result of your participation in the Program then if you participate in other programs that your Advisor offers.
- 2) if your Advisor charges you the Wrap Account Fee which wraps management, administrative and transaction costs into one fee rather than having you pay for these services separately.

As such, your Advisor could have a financial incentive to recommend the Program to you over other programs or services.

### **Termination of Program Investments**

We reserve the right to terminate the offering of any Asset Allocation Model or any Mutual Fund or ETF therein at any time and in any manner. In the event of termination, you will be given reasonable advance notice of the termination and a reasonable opportunity to select a different Asset Allocation Model, Mutual Fund or ETF, as applicable. If you fail to act within 30 days after receiving such notice, we reserve the right in our sole discretion, to transfer your Program Account assets to a non-discretionary, unmanaged brokerage account or substitute the terminated Asset Allocation Model with another substantially similar Asset Allocation Model, Mutual Fund or ETF, as applicable.

### **Section 31 SEC Transaction Fee**

In accordance with Section 31 of the Securities Exchange Act of 1934, self-regulatory organizations (SROs) -- such as the Financial Industry Regulatory Authority (FINRA) and all of the national securities exchanges -- must pay transaction fees to the Securities and Exchange Commission (SEC) based on the volume of securities that are sold on their markets ("Section 31 SEC Transaction Fee"). The Section 31 SEC Transaction Fee is designed to recover the costs incurred by the government, including the SEC, for supervising and regulating the securities markets and securities professionals. The SROs have adopted rules that require their broker-dealer members to pay a share of these fees. Broker-dealers, in turn, impose fees on their customers that provide the funds to pay the fees owed to their SROs.

Section 31 SEC Transaction Fees imposed on your Program Account are calculated as number of shares x price per share x a specified rate set by the SEC; a small fraction of a cent that will fluctuate periodically. The applicable fee will appear on your trade confirmation. To find the current rate for Section 31 transaction fees, please visit the Division of Market Regulation's Frequently Requested Documents webpage, and click on the most recent Fee Rate Advisory under "Section 31 Fees."

Neither the Firm, your Advisory Representative, nor your Advisor receives any portion of the Section 31 SEC Transaction Fee.

## **Sweep Programs**

The term “Free Credit Balance” refers to the credit balance that remains in a brokerage account after all purchases are made and are free from withdrawal restrictions. A free credit balance generally originates from dividends, interest payments, and/or security sales and may be used at any time to purchase more securities.

Your Program Account is maintained by one of the Advisor Group Firms’ clearing agents; Pershing or NFS. If elected by you in the Sweep Program Terms & Conditions, the Free Credit Balance will be automatically deposited or “swept” into a cash sweep investment (“Sweep Investment”). There are two types of Sweep Investments that may be utilized for your Program Account, as determined by the type of Program Account maintained by you and approved by you.

### **Sweep Program – Pershing Accounts**

Beginning August 27, 2016, new accounts custodied at Pershing will be eligible for the Pershing sweep program (the “Pershing Sweep Program”). The Pershing Sweep Program allows you to automatically transfer free credit balances to a deposit account at one or more banks whose deposits are insured by the Federal Deposit Insurance Corporation (the “FDIC Program”), or, in limited cases, a money market mutual fund product (the “Money Market Mutual Fund Program”). If an account custodied at Pershing elects the Pershing Sweep Program, free credit balances will default to an eligible sweep product, as outlined below.

#### **FDIC Program**

The FDIC Program is offered to the following types of accounts custodied at Pershing:

1. Non-IRA retail brokerage accounts.
2. Pershing IRAs.
3. SunAmerica Trust Company (STC) IRAs.

Free credit balances in a deposit account may earn interest that is compounded daily and credited to your account monthly. Interest begins to accrue on the date of deposit within banks participating in the program (“Program Banks”), through the business day preceding the date of withdrawal from the deposit account. The daily rate is 1/365 (or 1/366 on a leap year) of the interest rate.

The Advisor Group Firms will receive a fee from the Program Banks in connection with deposit accounts. This fee may be as much as 200 basis points (2 percent) per year, on the average daily balances held in these deposit accounts. The Advisor Group Firms may waive any portion of the fee, or the fee in its entirety, received from the Program Banks.

Your Advisory Representative will not receive any portion of the fees paid by the Program Banks. The amount of fees received by Pershing, the Advisor Group Firms, and any other service provider, will affect the interest rate paid on your deposit account(s). Other than applicable fees imposed by the Advisor Group Firms on your brokerage account (including fees charged on your Pershing IRAs or your STC IRAs) there will be no charges, fees, or commissions imposed on your account with respect to the FDIC Program.

#### **Money Market Mutual Fund Program**

Free credit balances in the following brokerage account types will be automatically swept into the Federated Government Reserves Fund (“Fund”)(GRFXX), which is managed by Federated Investors (“Federated”):

- All ERISA Title 1 account types, including Profit sharing plans, 401(k), Roth 401(k), Simple 401(k), Individual 401(k), qualified deferred compensation plans, defined benefit plans, target benefit plans, and money purchase pension plans; and
- All 403(b)(7) accounts.

The Fund invests primarily in a portfolio of short-term U.S. Treasury and government securities and seeks to maintain a stable share price of \$1.00.

The Advisor Group Firms and Pershing may receive additional compensation, in the form of distribution assistance from the Fund.

### **Sweep Program – NFS Accounts**

For accounts custodied at NFS, the NFS Sweep Program allows you to automatically transfer free credit balances into a money market mutual fund product (“Money Funds”) as outlined below.

- Fidelity Government Capital Reserves Fund (FZAXX). All taxable (non-qualified) accounts for individual/joint accounts as well as entity/corporate accounts.
- Fidelity Government Fund – Daily Money Class (FZBXX). All IRA in which NFS serves as the IRA Custodian,

The Money Funds are managed by Fidelity Management & Research Company and seek to preserve a net asset value of \$1.00 per share.

The Advisor Group Firms and NFS may receive additional compensation, in the form of distribution assistance from the Money Funds.

### **Conflicts of Interest**

A conflict of interest arises as a result of the financial incentive for the Advisor Group Firms through offering a Sweep Investment that generate third party payments for the Advisor Group Firms. Since additional compensation is earned by the Advisor Group Firms through its Sweep Investment, a conflict of interest also arises as a result of the economic benefit derived by the Advisor Group Firms when cash balances are swept into the Sweep Investment, rather than being reinvested in other investment funds or securities. The foregoing conflicts of interest are mitigated by the fact that the Advisory Representative who makes investment recommendations for your Program Account does not receive any economic benefit from these payments

### **Distribution Assistance**

For additional information on such distribution assistance, please visit [www.royalalliance.com](http://www.royalalliance.com); [www.sagepointfinancial.com](http://www.sagepointfinancial.com); [www.joinfsc.com](http://www.joinfsc.com); [www.joinwoodbury.com](http://www.joinwoodbury.com) and refer to the “Indirect Compensation” section underneath the “Disclosures” link, or you may refer to the Fund’s prospectus or your Advisory Representative for additional information related to such fees. In an effort to maintain a positive yield to a customer, a Fund company such as the Fund may reduce or waive a portion or all of its internal management and/or distribution fees. Please consult the Fund’s prospectus, or your Advisory Representative, for additional information on such fee waivers.

## **Item 5 - Account Requirements and Types of Clients**

### **Types of Clients**

The Program is available to individuals, pension and profit sharing plans, trusts, estates, charitable organizations, corporations and banks as well as other business entities.

### **Minimum Account Size**

The minimum account size for Program Accounts for each Program Manager is disclosed above in Item 4 under each Program Manager's fee schedule. The minimum account size may be waived in certain situations, such as for a client who intends to bring in additional assets or account depreciation.

## **Item 6 - Portfolio Manager Selection and Evaluation**

Your Advisory Representative is the sole portfolio manager available with respect to the Program. Advisory Representatives are selected by their Firms based on various criteria including experience.

You should refer to the relevant Form ADV of the Firm with which your Advisory Representative is associated.

## **Item 7 - Client Information Provided to Portfolio Managers**

Your personal identification, account and holdings data are disclosed to your Advisor to enable your Advisor to help determine the Program Investments that are suitable for you.

Your Advisor provides us with access to the following client related information: (i) account opening documents (which include, among other things, your investment objective, risk tolerance and any account restrictions you imposed on management of assets); (ii) your investment guidelines (if applicable); and (iii) reports relating to the performance of your account.

We share your personal account data in accordance with our privacy policy detailed below.

### **Privacy Notice**

We have adopted the following privacy policy:

Maintaining your trust and confidence is a high priority. That is why we want you to understand how we protect your privacy when we collect and use information about you, and the steps that we take to safeguard that information. This notice is provided to you on behalf of VISION2020 Wealth Management Corporation.

### **Information We Collect:**

In connection with providing investment products, financial advice, or other services, we obtain non-public personal information about you, which may include:

- Information we receive from you on account applications, such as your address, date of birth, Social Security Number, occupation, financial goals, assets and income;
- Information about your transactions with us, our affiliates, or others; and
- Information received from credit or service bureaus or other third parties, such as your credit history or employment status.



## Categories of Parties to Whom We Disclose:

We will not disclose information regarding you or your account with us, except that we may disclose under the following circumstances:

- To your authorized Financial Adviser and his or her manager;
- To our parent companies or affiliates, to the extent permitted by law;
- To entities that perform services for us or function on our behalf, including financial service providers, such as a clearing broker-dealer, investment company, or insurance company;
- To consumer reporting agencies;
- To third parties who perform services on our behalf;
- To your attorney, trustee or anyone who represents you in a fiduciary capacity;
- To our attorneys, accountants or auditors; and
- To government entities or other third parties in response to subpoenas or other legal process as required by law or to comply with regulatory inquiries.

We do not sell customer lists or customer information to third parties.

We disclose non-public personal information about you in connection with the transfer of your account to another financial institution at your request or the request of your Advisory Representative. We permit Advisory Representatives that terminate their affiliation with us to make copies of their client files\*. If you do not want VISION2020 Wealth Management Corporation to disclose your non-public personal information with your Advisory Representative's new financial institution, please contact **VISION2020 Wealth Management Corporation Attn: Legal Department, 10 Exchange Place, Suite 1410, Jersey City, NJ 07302.**

\*If you reside part-time or full-time in a state that requires your affirmative consent before we provide your non-public personal information to certain third-parties – such as in connection with the transfer of your Advisory Representative to another financial institution – we will obtain such consent as required.

## How We Use Information:

Information is used among the affiliate companies that perform support services for us, such as data processors, technical systems consultants and programmers, or companies that help us market products and services to you for a number of purposes, such as:

- **To protect your accounts** from unauthorized access or identity theft;
- **To process your requests**, such as securities purchases and sales;
- **To establish or maintain an account with an unaffiliated third party**, such as a clearing broker-dealer providing services to you and/or VISION2020 Wealth Management Corporation;
- **To service your accounts**, such as by issuing checks and account statements;
- **To comply** with Federal, State, and Self-Regulatory Organization requirements; and
- **To keep you informed** about financial services of interest to you.

## Our Security Policy:

We restrict access to nonpublic personal information about you to those individuals who need to know that information to provide products or services to you and perform their respective duties. We maintain physical, electronic, and procedural security measures to safeguard confidential client information.

## Closed or Inactive Accounts:

If you decide to close your account(s) or become an inactive customer, our Privacy Policy will continue to apply to you.

**Complaint and Privacy Notification:**

Please direct complaints to: Customer Complaints Officer, 2300 Windy Ridge Parkway, Atlanta, Georgia 30067 and questions, or issues regarding the Privacy Policy to: Chief Privacy Officer, 10 Exchange Place, Suite 1410, Jersey City, NJ 07302.

**Changes to This Privacy Policy:**

If we make any substantial changes in the way we use or disseminate confidential information, we will notify you.

**Item 8 - Client Contact with Portfolio Managers****Client-Advisor Relationship**

You are encouraged to contact your Advisor with respect to any changes regarding your investment objectives, risk tolerance and requested restrictions with respect to management of your Program investments. You should direct any questions that you have regarding the Program to your Advisor.

**Item 9 - Additional Information****Disciplinary Information**

Not applicable. Neither we, nor any of our management people have been involved in any disciplinary events that are material to your evaluation of our Program or the integrity of our management.

**Other Financial Industry Activities and Affiliations**

Advisors that offer the Program may be Related Persons to us. You should see the ADV Part 2A of your Advisor that will be provided to you for information regarding any of their other financial industry affiliations and for any associated conflicts of interest.

**Code of Ethics**

We have adopted a Code of Ethics (the "Code") to address securities-related conduct. The Code focuses primarily on fiduciary duty, personal securities transactions, insider trading, gifts, and conflicts of interest. The Code includes our policies and procedures developed to protect your interests in relation to the following topics:

- The duty at all times to place your interests first;
- The requirement that all personal securities transactions be conducted in such a manner as to be consistent with the code of ethics and to avoid any actual or potential conflict of interest or any abuse of an employee's position of trust and responsibility;
- The principle that investment adviser personnel should not take inappropriate advantage of their positions;
- The fiduciary principle that information concerning the identity of security holdings and your financial circumstances is confidential; and
- The principle that independence in the investment decision-making process is paramount.

We provide a copy of the Code to any client or prospective client upon request to their Advisory Representative.

In limited circumstances, and in compliance with the Investment Adviser's Act of 1940, Section 206(3) and the Rules hereunder (collectively, the "Act"), we perform principal or agency cross transactions as such activities are described in the Act.

Individuals who are covered by our Code ("Access Persons") can buy or sell securities identical to those recommended to you for their personal accounts. In addition, any of our Related Person(s) may have an interest or position in securities which are recommended to you. Our Code requires Access Persons to report their personal securities holdings for review by us.

## **Participation and Interest in Client Transactions**

Your Advisor, who may be a Related Person to us, can recommend or buy and sell securities that it or its Related Persons' have a financial interest in. Please see the ADV Part 2A of your Advisor for further details on these financial interests and associated conflicts of interest.

## **Trade Confirmation Suppression in Wrap Fee Accounts**

Because your Program Account is managed on a discretionary basis and is offered using the Wrap Account, you will have the option to request that we suppress trade-by-trade confirmations and present a periodic account statement, not less often than monthly. The periodic account statement must contain the same information as is required pursuant to Rule 10b-10 ("Trade Confirmation Suppression Option"). If you choose the Trade Confirmation Suppression Option, you will have the opportunity to signify this request by providing your initials as designated in the "Acknowledgement" section of the SIS.

## **Trade Confirmation Suppression Option**

If you elect the Trade Confirmation Suppression Option, you will be able to later change your mind and request, for no additional cost, trade-by-trade confirmations for any transaction since the date of the last periodic statement, as well as for all subsequent transactions. You will also be able to request, for no additional fee, trade-by-trade confirmations for previous transactions for up to a one-year period preceding the last periodic statement. If you elect not to receive trade-by-trade confirmations, you will be able to receive an interim update and further details concerning any transactions conducted between period statements without charge, by contacting your Advisory Representatives or by checking our website. In accessing our website, you will be able to view, no later than the next business day after trade date (T+1), all information required by Rule 10b-10. You will also be able to obtain the same information required by telephoning their representative or by requesting the trade-by-trade confirmation for the particular transaction.

If interested in the Trade Confirmation Suppression Option, you should contact your Advisory Representative to obtain more information or to obtain a SIS to request such option.

## **Trade-by-Trade Confirmations**

We will continue to generate and send trade-by-trade confirmations to you should you elect not to request the Trade Confirmation Suppression Option. In no event will we charge you for trade confirmations in Wrap Accounts.

## **Review of Accounts**

Your Advisor periodically reviews your account and contacts you annually. For further account review details, please see the ADV Part 2A of your Advisor.

## **Client Referrals and Other Compensation**

As Program Sponsor, we receive a portion of the Account Fee as described in Item 4 above and as disclosed in our Revenue Sharing Disclosure below. For further details on compensation and other economic benefits that your Advisor receives, please see their ADV Part 2A.

## **Revenue Sharing Disclosure**

Regarding the Wealth Management Platform – Model Portfolios Program (“Program”), we maintain revenue sharing arrangements with certain Program Managers no longer available to new assets. Each such Program Manager will pay us up to .35% (35 basis points) per year of the assets under management held in the Program within its mutual fund asset allocation models.

For further details, please see our affiliate websites ([www.royalalliance.com](http://www.royalalliance.com); [www.sagepointfinancial.com](http://www.sagepointfinancial.com); [www.joinfsc.com](http://www.joinfsc.com); [www.joinwoodbury.com](http://www.joinwoodbury.com)).

The Advisor does not receive additional compensation from us in connection with the placement of assets with Program Manager Partners, however because of these revenue sharing arrangements, Advisor may prefer recommending asset allocation models of Program Manager Partners over other investment models or products whose sponsors do not maintain revenue sharing arrangements with us. You should feel free to ask your Advisor how it will be compensated for any transaction.

*This information is current as of March 2017. We will update information regarding revenue sharing arrangements as necessary and contact clients as required.*

## **Financial Information**

Your Program assets will be custodied at Pershing, LLC or on a limited basis, at National Financial Services, LLC. The Program does not allow, require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance. Therefore, we are not required to include a balance sheet for our most recent fiscal year. We have no financial condition that might impair our ability to meet our contractual commitments to clients, and has never been the subject of a bankruptcy proceeding.

## **Item 10 - Requirements for State-Registered Advisers**

Not Applicable. We are an SEC registered investment adviser. We are not registered with any state securities authority.