

Wealth Management Platform

- Model Portfolios Program -

Part 2A – Appendix 1

Program Brochure

For

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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.

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 June 1, 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 material changes to the Appendix-1 have occurred:

- Item 4 – Advisory Services- The following Program Managers are now offered as part of the Model Portfolios Program:
 1. Horizon Investments
 2. S&P Investment Advisory Services
 3. Frontier Asset Management

- Item 4 – Advisory Services- The following Program Managers are now offered as part of the Model Portfolios Program under the Advisor Group Genesis Series:
 1. BlackRock Investment Management
 2. Frontier Asset Management (ETF Models)
 3. Vanguard

- Item 4 – Services, Fees and Compensation: Disclosure has been updated to reflect investments in asset allocation models not offered as part of the Program.

- Item 4 – Services, Fees and Compensation: Disclosure has been updated to clarify the roles and responsibilities that we and Envestnet Asset Management have in the execution of transactions in your Program Account.

- Item 4 – Services, Fees and Compensation: Fee tables have been added to reflect Program Managers added to the Model Portfolios Program.

- Item 4 – Services, Fees and Compensation: Fee tables have been updated to reflect Program Managers no longer offered through the Genesis Series.

- Item 9 – Additional Information (Revenue Sharing Disclosure): Updated disclosure to provide information about the Advisor Group Firms' revenue sharing arrangements.

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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.

Frontier Asset Management, LLC

Horizon Investments, LLC

LWI Financial Inc.

New Frontier Advisors, LLC

Russell Investment Management Company, LLC

S & P Investment Advisory Services, LLC

Vanguard Advisers, Inc.

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.

The Program offers Asset Allocation Models which contain: 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. You and your Advisory Representative will select an Asset Allocation Model based upon your risk tolerance and financial objectives. 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. By accepting the Statement of Investment Selection (SIS) and accompanying Terms and Conditions, you authorize us to execute transactions on a discretionary basis. We, in turn, utilize Envestnet Asset Management, Inc. (Envestnet), an independent investment adviser, to execute the transactions on your behalf. Envestnet will use discretionary authority to execute securities transactions that are recommended by the Asset Allocation models developed by the Program Manager. We will be responsible for general rebalancing the portfolio of ETFs within your account in accordance with the instructions provided by Program Manager. The Program offers Asset Allocation Models to accounts with initial balances ranging from \$5500 to \$50,000. Asset Allocation Models offered with initial balances of less than \$25,000 are collectively marketed and offered under the name "Genesis Series". Please refer to the Schedule of Account Fees in this section for more details on the initial balance requirements for Asset Allocation Models offered.

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. 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 and/or Mutual Funds will exceed what could have been obtained through other investment or savings strategies.

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 18 different portfolios with each portfolio generally consisting of 6-16 ETFs. With our assistance, your Advisory Representative will invest in a recommended BlackRock Allocation Model of ETFs suitable to your risk tolerance and investment objectives. BlackRock Asset Allocation Models are offered under the Genesis Series.

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 Advisory Representative will invest in a recommended Caprin Asset Allocation Model of ETFs suitable to your risk tolerance and investment objectives.

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 Advisory Representative will invest in a recommended Clark Capital Asset Allocation Model suitable to your risk tolerance and investment objectives.

Investnet Asset Management, Inc.

Program Manager, Investnet Asset Management ("EAM"), will provide asset allocation models across three portfolios in accordance with its investment advisor, Portfolio Management Consultants ("PMC"). Specifically, EAM will provide Asset Allocation Models constructed exclusively of low-cost passively managed index mutual funds (the "PMC Passive Foundation Portfolios"), each portfolio consisting of approximately 3 – 5 holdings. In addition, EAM will provide Asset Allocation Models constructed of ETFs across 7 model portfolio options, with each portfolio consisting of 5 -8 holdings (the "PMC Strategic ETF Solution Portfolios"). Finally, EAM has partnered with Capital Group's American Funds to provide a series of mutual fund based asset allocation portfolios, that have been 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 of which 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 Advisory Representative will invest in a recommended PMC American Funds® Active Core Portfolio suitable to your risk tolerance and investment objectives. EAM Asset Allocation Models are offered under the Genesis Series.

Frontier Asset Management, LLC

Program Manager, Frontier Asset Management, LLC ("Frontier") will provide Asset Allocation Models composed of ETFs and mutual funds. Frontier provides ETF Asset Allocation Models composed of a series of ETFs offered within 5 different portfolios with each portfolio generally consisting of 5 to 9 ETFs (The "Frontier ETF Asset Allocation Models"). The ETFs utilized in these strategies are index based, meaning they attempt to mimic an index that is being used to represent each asset class. The ETFs that Frontier uses are liquid and allow them to achieve broad market diversification. Frontier provides Mutual Fund Asset Allocation Models composed of a series of Mutual Funds offered within 18 different portfolios with each portfolio generally consisting of 8-15 mutual funds (the "Frontier Mutual Fund Asset Allocation Models"). Strategies used for the Frontier Mutual Fund Asset Allocation Models can be divided into two categories; Globally Diversified strategies and Alternative Strategies. The Globally Diversified strategies are constructed using a wide range of asset classes and are designed to satisfy the "core strategy" needs of investors at defined risk levels. There are minimum and maximum constraints placed on the percentage of assets that can be allocated to 5 major asset class groups. Alternative Strategies may be broadly diversified, but since there are no asset class constraints on Frontier's Alternative Strategies, they may, at times, be more narrowly concentrated than the Globally Diversified strategies. With our assistance, your Advisory Representatives will invest your Program Account in a recommended Frontier Asset Allocation Model suitable to your risk tolerance and investment objectives. The Frontier Mutual Fund Asset Allocation Models are available in a tax aware version. The Frontier ETF Asset Allocation Models are offered under the Genesis Series.

Horizon Investments, LLC

Program Manager, Horizon Investments, LLC (“Horizon”) will provide ETF Asset Allocation Models. Horizon offers different strategies designed to navigate the three key stages of an investment lifecycle: Gain, Protect and Spend. The Horizon Gain-Global Active Strategy Portfolios (“Horizon Global Active Strategy Portfolios”) are offered within 5 different portfolios with each portfolio generally consisting of 10 to 18 ETFs. The Horizon Global Active Strategy Portfolios have the flexibility to pursue opportunities on a global basis and generate alpha from a diversified set of risk exposures. Horizon’s strategies are best classified as dynamic. This type of flexible investment approach combines a strategic approach with a limited amount of short-term, tactical moves. They typically remain fully invested and diversified, but attempt to take advantage of short-term macroeconomic and/or market factors to enhance returns. Horizon Global Active Strategy Portfolios asset allocation decisions are made using a multi-disciplined active asset allocation investment approach, designed to provide risk-adjusted performance relative to a stated benchmark. Horizon allocates the assets across various sectors of the global securities markets using a qualitative and quantitative multi-disciplined approach. The Horizon Protect-Active Risk Mitigation Strategy Portfolios (“Horizon Active Risk Mitigation Strategy Portfolios”) are offered within 3 different portfolios with each portfolio generally consisting of 10 to 18 ETFs. The Horizon Active Risk Mitigation Strategy Portfolios are designed to mitigate potential harm in times of heightened market volatility. Horizon’s algorithm-based risk overlay tools employ financial engineering that dynamically shifts clients out of markets as they decline and back into markets as they stabilize and rise. The Horizon Spend-Retirement Distribution Strategy Portfolios (“Horizon Retirement Distribution Strategy Portfolios”) are offered within 5 different portfolios with each portfolio generally consisting of 8 to 11 ETFs. The Horizon Retirement Distribution Strategy Portfolios are designed to strike the ideal balance between the current income needed to fund retirement goals and obligations, and asset longevity. With our assistance, your Advisor Representative will invest in a recommended Horizon Allocation Model of ETFs suitable to your risk tolerance and investment objectives.

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 Advisory Representative will invest in a recommended Asset Allocation Model of DFA Funds suitable to your risk tolerance and investment objectives.

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 Advisory Representative will invest in a recommended New Frontier Asset Allocation Model of ETFs suitable to your risk tolerance and investment objectives.

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 Advisory Representative will invest 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”). The Russell Investment Company will also 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). 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. The Russell Hybrid Model Portfolios are offered under the Genesis Series.

Standard and Poor's Investment Advisory Services, LLC

Program Manager, Standard and Poor's Investment Advisory Services, LLC ("S&P IAS") will provide Asset Allocation Models composed of either mutual funds or ETF's. The ETF Asset Allocation Models are composed of a series of ETFs offered within 16 different portfolios with each portfolio generally consisting of 11 to 13 ETFs (the "S&P IAS ETF Models"). The mutual fund Asset Allocation Models are composed of a series of mutual funds offered within 8 different portfolios with each portfolio generally consisting of 11 to 16 mutual funds (the "S&P IAS Mutual Fund Models"). With our assistance, your Advisory Representative will invest in a recommended SPIAS Allocation Model suitable to your risk tolerance and investment objectives.

Vanguard Advisers, Inc.

Program Manager, Vanguard Advisers, Inc. ("Vanguard") will provide ETF Asset Allocation Models composed of a series of ETFs offered within 22 different portfolios with each portfolio generally consisting of 2-9 ETFs. With our assistance, your Advisory Representative will invest in a recommended Vanguard Asset Allocation Model of ETFs suitable to your risk tolerance and investment objectives. Vanguard Asset Allocation Models are offered under the Genesis Series.

Other Models

In addition to the aforementioned Program Managers, you may be offered or allowed to maintain investments in Asset Allocation models from other Program Managers ("Other Models"). Generally, the availability of Other Models is limited to accounts where you already maintain investments in the Other Model. Please refer to the Statement of Investment Selection ("SIS") for the Asset Allocation Model chosen for your account.

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 Advisory 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 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 or decrease 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, LLC

Total Account Value	Minimum Account Fee	Maximum Account Fee
\$15,000 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 = \$15,000

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Caprin Asset Management, LLC

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 Capital Management Group, Inc.

a. 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

b. Clark Global Navigator/MultiStrategy

Total Account Value	Minimum Account Fee	Maximum Account Fee
\$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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Envestnet Asset Management, Inc.

a. 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. 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. PMC Strategic ETF Solution Portfolios

Total Account Value		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

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Frontier Asset Management, LLC

a. Frontier ETF Asset Allocation Models

Total Account Value	Minimum Account Fee	Maximum Account Fee
\$15,000 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 = \$15,000

b. Frontier Mutual Fund Asset Allocation Models

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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Horizon Investments, LLC

a. Horizon Gain-Global Active Strategy Asset Allocation Models

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

Minimum Account Size = \$25,000

b. Horizon Protect-Active Risk Mitigation Strategy and Spend-Retirement Distribution Strategy Asset Allocation Models

Total Account Value	Minimum Account Fee	Maximum Account Fee
\$25,000 to \$99,999	0.640%	2.390%
\$100,000 to \$249,999	0.640%	2.390%
\$250,000 to \$499,999	0.605%	2.355%
\$500,000 to \$749,999	0.595%	2.345%
\$750,000 to \$999,999	0.560%	2.310%
\$1,000,000 to \$1,999,999	0.535%	2.285%
\$2,000,000 to \$4,999,999	0.500%	2.250%
\$5,000,000 to \$9,999,999	0.465%	2.215%
\$10,000,000 to \$24,999,999	0.465%	2.215%
\$25,000,000 and Over	0.455%	2.205%

Minimum Account Size = \$25,000

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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 = \$25,000

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New Frontier Advisors, LLC

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

Minimum Account Size = \$25,000

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Russell Investment Management, LLC

a. Russell Investment Management - Hybrid Model Portfolios

Total Account Value	Minimum Account Fee	Maximum Account Fee
\$10,000 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

b. Russell Funds and Russell Tax Managed Model

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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Standard and Poor's Investment Advisory Services, LLC ("S&P IAS")

a. S&P IAS ETF Models

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 = \$25,000

b. S&P IAS Mutual Fund Models

Total Account Value	Minimum Account Fee	Maximum Account Fee
\$50,000 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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Vanguard Advisers, Inc.

Total Account Value	Minimum Account Fee	Maximum Account Fee
\$15,000 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 = \$15,000

Methods of Calculating Account Fees

Your Account Fee is billed using the 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 this Program rather than participating 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 the clearing agents of Royal Alliance Associates, Inc., SagePoint Financial, Inc., FSC Securities Corporation and Woodbury Financial Services, Inc. in each firm's capacity as a broker-dealer (collectively, the "Advisor Group Firms"): 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

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 "Advisor Group FDIC Insured Deposit Program" or 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.

Up until July 3, 2017, the Advisor Group Firms received a fee from the Program Banks in connection with deposit accounts established prior to June 1, 2017 (the "Pershing Legacy Accounts" that may have been as much as 200 basis points (2 percent) per year, on the average daily balances held in these deposit accounts.

For accounts established on or after June 1, 2017, the Advisor Group Firms will receive a maximum monthly per account fee of \$22 for services in connection with maintaining and administering the FDIC Program (the "FDIC Program Account Fee"). The FDIC Program Account Fee is not based on the amount of assets in the FDIC Program or your Program Account and does not depend on or vary with (and is not affected by), the actual amounts held in the deposit accounts or your Program Account.

The FDIC Program Account Fee will generally be paid on your Program Account's behalf by the Program Banks; however, the fee may be deducted directly from your Program Account if, for example, the amounts paid by the Program Banks are insufficient to cover the FDIC Program Account Fee.

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).

For additional information about the FDIC Program, please refer to the Advisor Group Firms' Sweep Program Terms and Conditions.

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.

Material Conflicts of Interest

For the NFS Sweep Program and Pershing Legacy Accounts, a conflict of interest arises due to the financial incentive from 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 due to an economic benefit derived by cash balances being swept into the Sweep Investment rather than reinvested in other investment funds or securities.

The foregoing conflicts of interest are mitigated under the Advisor Group Firms' Policies and Procedures that have been adopted for this purpose, and 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 distribution assistance, please visit www.royalalliance.com; www.sagepointfinancial.com; www.joinfsc.com; or www.joinwoodbury.com and refer to the "Indirect Compensation" section underneath the "Disclosures" link. You may also refer to the Fund's prospectus or ask your Advisory Representative for additional information related to such fees. In an effort to maintain a positive yield to a customer, a Fund company 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

The Advisor Group Firms maintain revenue sharing arrangements with certain mutual funds, (referred to as "Strategic Partner(s)"). Strategic Partners pay up to 25 basis points (0.25%) of your total purchase amount of a mutual fund. Additionally, some Strategic Partners make a quarterly payment or additional quarterly payment based on the assets you hold in the fund over a period of time of up to 18 basis points (0.18%) per year. Alternatively, the Advisor Group Firms may receive compensation from the mutual fund as: (1) a flat fee regardless of the amount of new sales or assets held in client accounts; or (2) the greater of such flat fee or amount based on assets and/or new sales as referenced above and any ticket charge payments referenced below.

The Advisor Group Firms do not accept the aforementioned mutual fund Strategic Partner revenue sharing payments on sales or assets held in investment advisory accounts of a plan subject to Title I of the Employee Retirement Income Security Act of 1974, described in section 4975(e)(1)(A) of the Internal Revenue Code ("Code") or an individual retirement account or annuity described in Internal Revenue Code section 4975(e)(1)(B) – (F) ("Qualified Advisory Accounts"). Instead mutual fund Strategic Partners will pay a flat annual partnership fee of up to approximately \$500,000 in exchange for certain marketing and services provided.

Though Advisory Representatives do not receive additional compensation in connection with sales of these products, the Strategic Partners do have greater access to Advisory Representatives to provide training and other educational presentations and product information so that they can serve clients better.

You do not pay more to purchase Strategic Partner investment products through the Advisor Group Firms than you would pay to purchase those products through another broker-dealer. Additionally, revenue-sharing payments received by the Advisor Group Firms are not paid to or directed to Advisory Representatives, and Advisory Representatives do not receive additional compensation for selling Strategic Partner products. Nevertheless, a potential conflict of interest may exist, in that the Advisor Group Firms are paid more if you purchase a Strategic Partner product, and Advisory Representatives may indirectly benefit from Strategic Partner payments when the money is used to support costs of product review, marketing or training, or for waiver of mutual fund ticket charges.

We maintain policies and procedures to ensure recommendations are suitable and require that Advisory Representatives always act in your best interest. We also maintain a supervisory structure to monitor the advisory activities of your Advisory Representative to reduce potential conflicts of interest. You are encouraged to ask us about any conflict presented.

For additional information, please refer to the “Client Information and Disclosures” section of our affiliate websites (www.royalalliance.com; www.sagepointfinancial.com; www.joinfsc.com; www.joinwoodbury.com).

This information is current as of October 27, 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.